

W01 comments

Response Capacity Response W1 comments

Veolia es
Birmingham Ltd

364 Whilst the principle is right, it needs to be recognised that some regional facilities will serve a number of WPAs. Economies of scale will provide better efficiencies for both operators and Las.

Business

Berkley Contract
Services Limited

705 From my experience the Worcestershire County Council does not practice what it preaches with respect to the Waste Hierarchy. Much more emphasis needs to be placed on the upper levels and Councils must be FORCED to deal with this properly and fully. Stop creating waste is the principle.

Business

National Farmers
Union

726 We support the drive to manage waste locally and move the community and business up the waste hierarchy. There is much that can be done to reduce unnecessary wastes arising. Packaging waste, both domestic and commercial is a good example. New solutions for disposal, reuse and recycling should be also investigated. There are disposal methods such as energy from waste which could offer alternatives to landfill. Managing waste locally will cut down on the need to transport it, thereby cutting the carbon footprint of the vehicles used to move it.

Business

RRA Architects

732 We find ourselves particularly in agreement with the proximity principle cited in the section on Managing Your Own Waste and on the need to minimise the transport of waste over long distances.

We believe that a coherent strategy ought to include plans to influence the presentation and minimise the packaging of goods with a view to the exclusive use of biodegradable or re-syllable materials.

Business

Response ***Response*** ***WI comments***
Capacity

Hertfordshire &
Worcs Chamber
of Commerce

808 The Chamber in consultation with its members agree that each sub-region should move towards becoming self sufficient with its waste hierarchy, however, in order to achieve this provision of waste sites should at a minimum safeguarded and where possible expanded.

Business

Birmingham
International
Airport Limited

833 The hazard presented by waste disposal and waste management sites, and in particular landfill sites, to aircraft and airports is the potential increase in bird activity, in the vicinity of the airport, due to the likely bird attractant features associated with waste disposal and landfill. Bird strikes are a major hazard and are also costly in terms of damage and delays to aircraft. The Waste Hierarchy should be an integral component of the Regional Waste Strategy. Translating this into a form of sequential testing, is one way to move forward and ensure a fair, consistent and sustainable approach to waste management for each Waste Planning Authority. Landfill should be seen as a method of last resort, for economic, environmental, social and Aerodrome Safeguarding (for sites within at least 13 kilometers of an airport) reasons.

Business

Harris Lamb
Limited

935 Existing facilities may handle waste from outside the region if capacity and infrastructure

Business

Birmingham
Chamber of
Commerce &
Industry
Business

971 BCI believes that the WMRSS should set out the principle as outlined in W1.

Confederation of
West Midlands
Chamber of
Commerce
Business

972 The Confederation believes that the WMRSS should set out the principle as outlined in W1.

Response ***Response*** ***WI comments***
Capacity

Sustainable
Rugby C/O N
Sanderson

1000 If the land provided is used for MRF,MBT and resource recovery.

Business

The Federation of
Small
Businesses West
Midlands

1105 Small businesses are at the heart of communities, whether rural or urban, and as such are keen to maintain the quality of the environment in which they operate. Also, in order to keep costs as low as possible, they automatically work to the environmental ideal of 'Reduce, reuse and recycle'. However, we have an example of a retailer operating more than one outlet who encounters very restrictive regulation on how he handles cardboard waste and is thus actively discouraged from recycling. We would like to see more local facility provision for recycling of items such as paper, cardboard, bottles and jars, cans woo and ink cartridges that can be accessed by small businesses as well as domestic council tax payers.

Business

National Farmers
Union, West
Midlands Region

1155 We support the drive to manage waste locally and move the community and business up the waste hierarchy. However waste management strategy should also address the generation of waste. There is much that can be done to reduce unnecessary wastes arising. Therefore when allocating sites Local Authorities must do what they can to ensure that measures are in place to assist business and the community with waste minimisation. New solutions for disposal, reuse and recycling should also be investigated. There are disposal methods such as energy from waste which could offer alternatives to landfill. Innovative re-use of waste streams ought to be encouraged, however support from the regulatory authorities will be needed. A more pragmatic approach to the definition of waste will enable more re-use and movement up the waste hierarchy. Managing waste locally will cut down the need to transport it, thereby cutting the carbon footprint of the vehicles used to move it.

Business

Rugby Branch of
the Coventry &
Warwickshire Ch
Com
Business

1160 If each WPA does not take account of these arising then waste will continue to be trans-shipped, cross borders

Response Capacity Response WI comments

Waste Recycling Group Ltd 1339 We support the view that waste management should be in accordance with the Waste Hierarchy. As a general principle self sufficiency at a WPA area is desirable but this sort of approach is likely to foster difficulties in implementation, whether by the WPAs themselves or by third parties with interests in specific development projects. There will clearly be locations and waste streams for which specific authorities will ultimately under or over provide and too rigorous an imposition of self sufficiency as an objective may tend to create difficulties bringing these forward. It would be regrettable if such an approach inadvertently led to a "drawbridge" mentality. Allocation of land for waste management is difficult to do on the basis of the tonnage anticipated to be managed because waste management options differ significantly in their land requirements. The approach should be to require WPAs to demonstrate that they have taken seriously the need to allocate sufficient sites to realistically be able to accommodate the amount of waste arising in their areas whilst at the same time ensuring that sites are clearly suitable for waste management are also allocated, regardless of whether this creates localised situations in

Business

Rugby Friends of the Earth 476 Too many items in one statement. New households being smaller are not using as much as would be predicted based only on size of house. Waste authorities should be required to minimise resource waste. Policies should focus on resource use - i.e.. There is no appropriate growth in waste.

Interest Group

Health Planning and Development Agency 478 As a trained environmental management/Historian, I believe that waste should be dealt with in the area it is made. Therefore a city or town cleans its own back yard, whatever the tonnage.

Interest Group

Warwickshire Rural Community Council 508 Warwickshire County Council is already doing this. We therefore support the principle.

Interest Group

Response **Response** **WI comments**
Capacity

Forestry
Commission

511 Support the waste hierarchy approach, provided that opportunities for energy from waste, particularly waste wood are not seen only as a last resort.

Interest Group

Atherstone Civic
Society

563 That would reduce the amount of waste that North Warwickshire accepts as, at present it imports waste from the rest of the Region to its land raising at Packington. It would also be more sustainable and give the Waste Planning Authority more incentive to re-cycle. But where then would the conurbation dump its waste?

Interest Group

West Midlands
Amenity
Societies
Association

569 There is little doubt that waste disposal is a major problem, and that government policy seeks to encourage recycling. The proposal to develop a waste hierarchy, while important, extends the planning system into areas it is not capable of controlling. For example there is no evidence that the planning system can or should develop policies for waste prevention or re-use. It is noted that the Regions the largest Energy from Waste capacity. However the discussion that follows appears to ignore the benefits that this can bring, concentrating on "holes in the ground", or landfill, s being a bad thing. RSS policies should focus more on resource use and waste management rather than just "waste". The links with the RES need to be stronger. The chapter focuses on how to get rid of waste, when it should be looking at how we minimise its creation in the first place and/or its recycling into alternative useful items. It is noted that the statistics relate (it is assumed) to the needs of disposal authorities. It is not possible to relate the figures to previous district figures for housing, or to figures for mineral extraction in the existing RSS policies. This is a fundamental flaw in the section, and makes any comments on the questions almost meaningless. The major problem with having the Waste Strategy in the RSS relates to the way in which it can be implemented. Certainly it would be possible to include conditions on planning permissions that seek to control waste.

Interest Group

Conservation for
Alrewas Group

615 Lichfield District Council has a good policy on waste, it recycles nearly half of all rubbish produced. Well done! I don't know what the rest of the county is like but surely LDC could act as a roll model.

Interest Group

Response ***Response*** ***WI comments***
Capacity

Campaign to
Protect Rural
England

642 Yes in principle. The location of sites should seek the optimum environmental outcome and so a sub-regional approach may allow more options to be explored. Strongly endorse waste management in accordance with the Waste Hierarchy.

Interest Group

Transport 2000
Herefordshire and
Worcestershire

712 Yes, stressing the reduction in the amount of waste generated to begin with.

Interest Group

West Midlands
Friends of the
Earth

917 We would support the proximity principle where activities are located as close as possible to their source. There will be economy of scale issues within this and there may well be locational issues with respect to LA/Partnerships borders whereby local knowledge can enable the most satisfactory solution and location to be agreed upon.
 A reduction in garden area and smaller household size should also lead to far less waste growth than just multiplying up the amount of waste pro-rata for the increase number of homes. Replacement of old dwellings with new ones at a higher density should also lead to reductions in garden waste.
 A large part of the diversion of commercial and industrial waste (C&I) should come from waste reduction measures that eliminate the creation of waste. The escalating costs of materials and waste management should lead to very wasteful activities becoming unviable.

Interest Group

Campaign to
Protect Rural
England

923 CPRE supports this approach. However we would want an assessment of environmental, landscape and transport impacts to take precedence over administrative boundaries for specific proposals.

Interest Group

<i>Response Capacity</i>	<i>Response</i>	<i>WI comments</i>
Hereford & Worcester Gardens Trust Interest Group	965	Fairest approach.
Ludlow 21 Interest Group	1020	This sounds like a fair and reasonable approach but does not allow for cross border interaction in the interests of optimising the use of specialised processing sites which may exist in one WPA and not in another.
Diocese of Worcester Interest Group	1093	- the Waste Hierarchy principle is a standard to which all WP Authorities should aspire, with targets and monitoring built in - the principle that all WP Authorities should take responsibility for their own waste or an equivalent amount is sensible, and encourage steps to be taken reduce waste. The more local a waste recycling/disposal site, the more likely people are to try to re-use, reduce and recycle -collaboration between authorities is obviously desirable where appropriate - it is also essential that WP Authorities learn from other countries, not last where waste-to-heat schemes appear to be working successfully, with environmental controls, traffic management, etc. built in
Regional Environment Partnership Interest Group	1206	Each WPA should as a direction of travel manage its own waste arising as far as possible.
Transport 2000 West Midlands Interest Group	1292	Waste sites should be easily accessible both form urban areas and form the strategic transport network, road and rail and indeed canals. (A number of waste authorities in other region already use so called "bin-liner" trains to transport landfill waste).

Response ***Response*** ***WI comments***
Capacity

Transport 2000
West Midlands

1312 Waste sites should be easily accessible both from urban areas and from the strategic transport network, road and rail and indeed canals. (A number of waste authorities in other region already use so called "bin-liner" trains to transport landfill waste).

Interest Group

Peak District
National Park
Authority

332 WMRSS needs to take into account any constraints that may occur in some parts of Staffordshire where, because of the Peak District National Park, local authority areas are not contiguous with land-use planning areas. Revised policy dealing with waste arising in the National Park and minimising disposal within it is set out in the submitted East Midlands Regional Plan (RSS8).

LA/Partnerships

Solihull
Metropolitan
Borough Council

358 CSW sub-region it is considered that the principle of self-sufficiency in managing waste is most appropriately applied at the sub regional level. This would minimise the environmental and economic costs of transporting waste, whilst recognising the need for sharing of facilities. The Section 4(4) response from CSW identified under-provision of land and facilities for managing municipal waste in the sub-region in the future. CSW put forward three options for addressing this in the longer term; expanding the Waste to Energy plant in Coventry, provision of additional waste to energy facilities in Warwickshire and Solihull and the allocation of sites for the treatment of waste to reduce the amount incinerated. It was recognised that interim arrangements involving the continued provision for landfill would be required.

LA/Partnerships

Herefordshire
Council

418 It would be reasonable to specify in the WMRSS the principle that each WPA or sub-region should: manage its waste arising in accordance with the waste hierarchy; allocate sufficient land in Local Development Documents to managing the amount of waste arising within its boundary, with appropriate growth rates in new households and diversion of Commercial and Industrial Waste from landfill. However, it should also be acknowledged that where agreements exist between WPA, such as with Herefordshire and Worcestershire, on waste matter, that the above is also taken into account.

LA/Partnerships

Response Capacity ***Response*** ***WI comments***

Worcestershire
County Council

646 Yes the WMRSS must be founded on the principle that each WPA/sub region manages its waste in accordance with the Waste Hierarchy and locates enough land in its LDDs to manage an equivalent tonnage of waste to that arising. This will ensure alignment with the Joint Municipal Waste Management Strategy which is founded on both the Waste Hierarchy and the proximity principle. While the principle of managing waste within the region it is produced is sound, it is also necessary to allow authorities the option of looking across regions to neighbouring authorities where facilities may be closer than those within the same region and also to ensure resilience. Also there may be specialist facilities which are needed to treat waste, e.g.. Recycling processing facilities, which are only found outside a region and it is not economically or environmentally sustainable to provide these facilities at a regional level. It is important that provision is made to accommodate fully growth arising from the formation of new households and diversion of Construction and Industrial

LA/Partnerships

Lower Broadheath
Parish Council

648 Landfill sites around Worcester and Malvern Hills are 'worked out' and waste is currently taken by road over considerable distances. This is not environmentally acceptable and alternatives must be investigated. The larger the number of homes and industry the greater the problem will become. Landfill sites have a detrimental appearance and incinerators create strong local opposition on environmental pollution ground. It is essential that it can be demonstrated that this additional waste can be managed in an environmentally acceptable way. Applicants submitting planning applications for both housing and commercial schemes must demonstrate how they propose to limit construction waste and in the case of commercial applications, the disposal of trade

LA/Partnerships

Atherstone Town
Council

653 See Warwickshire Waste Management Strategy throughout

LA/Partnerships

Response Capacity ***Response*** ***WI comments***

Walsall Council 759 We agree with the underlying principles, subject to qualifications. We support the general principle that waste should be managed in accordance with the "waste hierarchy". We agree that each WPA or sub-region should plan for the management of waste in ways that promote waste reduction. We agree with the general principle that WPAs/sub-regions should aim to plan for the management of a tonnage of waste equivalent to the amount that is likely to arise within their area. However, the RSS can only require WPAs/sub-regions to aspire towards self-sufficiency. It would be more reasonable and more realistic for the RSS to require each WPA or sub-region to demonstrate that adequate provision can be made to manage the tonnages of waste likely to arise within their area. A DPD can make provision for waste management in various ways and the RSS should not assume that site allocation is the best or only way to make provision for new facilities. Protecting a minimum reservoir of employment land and permitting waste management facilities to be located within employment areas gives greater flexibility and is more likely to be effective.

LA/Partnerships

Wyre Forest District Council 762 Support for this approach.

LA/Partnerships

Rugby Borough Council 771 If each WPA does not take account of these arisings then waste will continue to be trans-shipped, cross borders.

LA/Partnerships

Clent Parish Council 783 Managed locally - different types of waste rural urban numbers are different too. Transport either from urban (metropolitan) to rural sites - vice versa = increased carbon into the atmosphere.

LA/Partnerships

Response **Response** **WI comments**
Capacity

Staffordshire
County Council

837 The principle that each WPA should manage an equivalent tonnage of waste to that arising within its boundary is supported. It is also considered that at the outset each WPA should plan for local self-sufficiency for the treatment and disposal of as many waste streams as reasonably possible. With particular reference to C&D wastes each WPA, particularly the Unitary Authorities, should attempt to manage this waste stream on the basis that on-site management is the first option, thus relieving some pressure from the Shire Authorities. There should be encouragement for 'virtual' quarries (e.g. Colemans in Birmingham) that can maximise the use of wastes as aggregates. Weight should be given to policy encouraging such facilities within the MUA or its fingers as per RSS policy M1 and M2, particularly in view of the pressure that there will be for additional housing land.

LA/Partnerships

Powys County
Council

838 The Waste Spatial Options emphasises the importance of meeting the needs of the West Midlands within the region. However the border between Powys and the West Midlands is in many ways an artificial boundary and it may be considered more sustainable for waste facilities to serve areas of both regions. The Spatial Options would therefore recognise that in the interests of sustainability, the waste management needs of adjoining areas must be considered.

LA/Partnerships

Sustainability
West Midlands

925 We believe this 'proximity principle' is a necessary, though not sufficient, condition for sustainable waste management

LA/Partnerships

Clifton upon
Dunsmore Parish
Council

953 If each WPA does not take account of these raisings then waste will continue to be trans-shipped, cross borders

LA/Partnerships

Kington Town
Council

973 With the involvement of town or parish councils.

LA/Partnerships

Response **Response** **WI comments**
Capacity

Telford & Wrekin Council 1018 We are fully in agreement with this approach. However, the involvement of waste between and within sub regions is important and should be taken into account. The issue of hazardous waste management needs to be dealt with at regional level.

LA/Partnerships

Inland Waterways Association (Birmingham) 1085 Waste should be managed in such a way as to minimise the amount of miles it travels from the householder to its final resting/processing place and that maximum mileage should be by environmental friendly transport where that is, or could be made, available. Where sites are nearer to the population of another LA/Partnerships whose site is much further away from the local (in the geographical sense) one local authorities should be encouraged to make recycling centres available to all, rather than preventing those from outside their boundaries from using their facilities and thus forcing users to do

LA/Partnerships

Gloucestershire County Council 1109 Yes. This is an appropriate approach.
 A general comment on the waste section of the WMRSS - it seems to cover a lot of detail that maybe e better addressed in waste core strategies, rather than at the regional level. The advice in PPS10 paragraph 6 - 15 should be followed.

LA/Partnerships

Redditch Borough Council 1142 Yes the WMRSS must be founded on the principle that each WPA/ sub region manages its waste in accordance with the Waste Hierarchy and locates enough land in its LDDs to manage an equivalent tonnage of waste to that arising. This will ensure alignment with the Joint Municipal Waste Management Strategy which is founded on both the Waste Hierarchy and the proximity principle
 While the principle of managing waste within the region it is produced is sound, it is also necessary to allow authorities the option of looking across regions to neighbouring authorities where facilities may be closer than those within the same region and also to ensure resilience. Also there may be specialist facilities which are needed to treat waste, e.g. recycling processing facilities, which are only found outside a region and it is not economically or environmentally sustainable to provide these facilities at a regional level. It is important that provision is made to accommodate fully growth arising from the formation of new households and diversion of Construction and Industrial waste away from landfill.

LA/Partnerships

Response Capacity **Response** **WI comments**

Solihull
Metropolitan
Borough Council

1146 In the CSW sub-region is considered that the principle of self-sufficiency in managing waste is most appropriately applied at the sub-regional level. This would minimise the environmental and economic costs of transporting waste, whilst recognising the need for sharing of facilities.
The Section 4(4) response from CSW identified under-provision of land and facilities for managing municipal waste in the sub-region in the future. CSW put forward three options for addressing this in the longer term; expanding the Waste to Energy plant in Coventry, provision of additional waste to energy facilities in Warwickshire and/or Solihull, and the allocation of sites for the treatment of waste to reduce the amount incinerated. It was recognised that interim arrangements involving the continued provision for landfill would be required.

LA/Partnerships

Dudley MBC

1150 The principle that each WPA, or sub region (e.g.. The Black Country), should manage waste in accordance with the Waste Hierarchy can be supported - this being a Government requirement as set out in PPS10 Planning for Sustainable Waste Management. Allocating land in a Waste DPD specifically for waste management purposes could be problematic given land use classification issues - can be either sui generis or B2 according to what is being proposed/interpreted. * Allocating a site for B2 could result in the site being developed instead for general industry. * Sui generis waste management facilities give rise to difficulties in terms of land use monitoring. * A B2 waste management facility could be installed at an existing B2 use class site without the WPA becoming aware (i.e.. Since planning permission may not be necessary). Changes to the Use Classes Order would be of benefit in this regard. There is also the issue of land values to overcome (encouragement to see waste as a resource and employment opportunity would help here). The waste arising from new households (construction and demolition, and subsequently municipal) and the diversion of waste from landfill will need to be considered. The eventual RSS Housing preferred option will influence waste planning in terms of quantities of waste arising and locations.

LA/Partnerships

South
Worcestershire
Authorities

1262 the WMRSS must be founded on the principle that each WPA/sub regions manages its waste in accordance with the Waste Hierarchy and allocate enough land in its LDDs to manage an equivalent tonnage of waste to that arising. This will ensure alignment with the Joint Municipal Waste Management Strategy which is founded on both the Waste Hierarchy and the proximity principle.
While the principle of managing waste within the region it is produced is sound, it is also necessary to allow authorities the option of looking across regions to neighbouring authorities where facilities may be closer than those within the same region and also to ensure resilience. Also there may be specialist facilities which are needed to treat waste, e.g. recycling processing facilities, which are only found outside a region and it is not economically or environmentally sustainable to provide these facilities at a regional level.

LA/Partnerships

Response Capacity ***Response*** ***WI comments***

Belbroughton Parish Council 1287 It is important to minimise the distances waste is transported for treatment of disposal. It also supports the principle that each Waste Planning Authority should allow for the equivalent of the tonnage of waste arising in its own area.

LA/Partnerships

Shrewsbury & Atcham Borough Council 1318 Response put forward by Shropshire County Council who are responsible for Waste Planning and Waste Development Frameworks.

LA/Partnerships

Rugby Borough Council 1319 If each WPA does not take account of these arisings then waste will continue to be trans-shipped across borders.

LA/Partnerships

CEPOG 1340 It would be reasonable and realistic for the Phase Two Revision to require each WPA or sub region to demonstrate that adequate provision can be made to manage the tonnages of waste that is likely to arise within their area to the extent that this is possible, practical and desirable, taking into account that WPAs do not control waste generation and can only indirectly influence decisions on where it can be managed.
We support the general principle that waste should be managed in accordance with the "waste hierarchy," and agree with the general principle that WPAs/sub-regions should aim to plan for the management of a tonnage of waste equivalent to the amount that is likely to arise within their area. However, the RSS can only require WPAs/sub-regions to aspire towards self-sufficiency, as in practice it will not always be feasible to achieve this at WPA or even sub-regional level.
The RSS should not assume that site allocation is the best or only way to make provision for new facilities. Protecting a minimum reservoir of employment

LA/Partnerships

Response ***Response*** ***WI comments***
Capacity

Coventry City Council 1345 IN principle this would a useful approach but it needs to be recognised that capacity also needs to be considered and that some sharing of facilities across boundaries will be necessary and also in some cases to achieve economies of scale.
The principle of maximising waste self-sufficiency first by sub-region as far as possible (through a CSW Waste Management Strategy), and then within the WM region, should be pursued as a policy objective within Revised RSS11. This will minimise the environmental and cost disadvantages of moving waste over long distances. It is recognised that on some occasions there will be a need for sharing facilities across certain sub-regions and/or because of the specialised nature of the facilities required. (Ref 5.6.3)

LA/Partnerships

Stafford 116 Wherever possible we should reduce the need to transport waste long distances. Bear in mind how critical it is becoming to reduce landfill to avoid punishing fines as well as the environmental arguments for doing so.

Other - please specify

Government Office for the West Midlands 587 PPS10 requires the RSS to include a concise strategy for waste management which should look forward for a fifteen to twenty years period. The RSS should comprise a distribution of waste tonnages requiring management, a pattern of waste management facilities of national, regional and sub-regional significance and supporting policies.
Waste should not be treated in isolation from other spatial planning concerns and your approach in terms of linking the municipal waste tonnage requiring management and the housing options is appropriate. As you develop the policies for submission, we would expect to see a clearer correlation between these land uses and the amount of commercial and industrial waste to be apportioned by Waste Planning Authority (WPA) area. It is a requirement that the apportionments are expressed as annual rates in the submission document.
A key element of the waste strategy is to reduce the amount of waste going to landfill, not only to meet the requirements of the Landfill directive diversion targets but also to reduce the impact of waste on climate change. It is therefore appropriate that the RSS revision maximises the opportunities to reduce the amount of waste going to landfill.

Other - please specify

Response **Response** **WI comments**
Capacity

Natural England
West Midlands 842 Supports the overall approach to waste management set out in the Spatial Options paper as it will likely result in the reduction of the amount of waste being directed to landfill.
Natural England supports the approach in W1 that each Waste Planning Authority or sub-region should manage waste in accordance with the waste hierarchy and allocate land within their DPDs specifically for waste management purposes.

Other - please
specify

Advantage West
Midlands 848 There is clearly the potential for re-use of existing industrial land for waste processing and recycling uses as evidence by some existing case studies. The chapter perhaps would be better framed as "Waste & Resource Recovery". In terms of locations, facilities should be as close as possible to the sources of waste arising, or in central locations to avoid unnecessary transport. Again the location of housing growth will influence the locations for these facilities.

Other - please
specify

Environment
Agency 1017 We agree that each WPA should manage its waste in accordance with waste hierarchy. We consider Local Authorities should plan where possible to manage their own waste or achieve net self sufficiency in accordance with guidance set out in PPS10.
in the future more waste will have to be recycled and diverted from landfill to meet government targets. These changes will result in a need for new waste management sites to process a range of waste streams. New recycling and recovering centres can be incorporated successfully into industrial estates and even mixed-use developments. The key issue is not the availability of land but having appropriate areas of land allocated as potential sites. It would be helpful if local authorities specified that all industrial allocations may include waste management sites.

Other - please
specify

Highways
Agency 1251 The Highways Agency would endorse the adoption of an RSS policy framework which is based on the principle that each waste planning Authority should identify sites to manage all the waste arising within their own area, or sub-region. Where possible care should be taken to locate such facilities away from the strategic highway network so as to avoid the potential for its unnecessary use as a means of accessing to them.

Other - please
specify

Response ***Response*** ***WI comments***
Capacity

Mercia Waste
Management C/O
Axis

654 We agree with the above in so far as it takes account of the management of waste arising from across the region, and from constituent waste planning authority areas, in particular we support the concept of sub-regions.

Professional

SITA C/O Axis

663 We agree with the above in so far as it takes account of the management of waste arising from across the region, and from constituent waste planning authority areas. However, we do not feel that this approach fully satisfies the requirements of paragraph 7 of PPS 10 which indicates that Regional Planning Bodies should take account of "likely demand for waste management capacity arising from neighbouring regions" or the potential for regional scale facilities where waste could be accepted from more than one authority.

Professional

Rugby Radio
Station Limited
Partnership

1070 All infrastructure and in particular waste infrastructure should be planned in relation to the level of new households and employment growth anticipated in the West Midlands over the next 20 years. Housing, employment, services, facilities and other key infrastructure should be considered in the planning for waste infrastructure so that it does not present a constraint to development or growth.

Professional

Home Builders
Federation

1086 It is important that waste is managed locally to where it arises. It is important to note that waste is produced by people, not new homes, and the ability of an area to accommodate waste e.g. landfill sites, should not be a reason for an area to not meet its housing needs and demands.

Professional

1 You are asking lots of questions in W1, but there are only two tick boxes. And they haven't been set so you can tick one box! A great start.

Resident

***Response
Capacity***

Response WI comments

45 If adjacent WPA's have available space then these should be used rather than creating any new or expanding existing sites. Thus there would be no need to additionally allocate lane for WPA in the WPA area concerned (CO2 trading comes to mind).

Resident

46 Yes, I think that each LA/Partnerships should be responsible for all aspects of waste management.

Resident

233 It is great concern that the current level of recycling is not higher, and that expansion of land-fill site has been necessary. If extra houses are built, waste recycling will inflict an ever larger blot on our countryside. Central Government seem to brush this issue aside, yet issue dictates from on high for growth.

Resident

291 We need to recycle far more at household and commercial/industrial levels - to do this we need far more news and extensive recycling plants sites for this we need regional strategy to require vastly less landfill and incineration. We need far greater levels of household curbside recycling of multi materials separated industry and commerce similarly far higher recycling targets

Resident

472 No industry etc should be set up without the other side of the coin being taken into account, both monetary and morally and environmentally.

Resident

***Response
Capacity***

Response WI comments

517 Waste should be managed close to source.
Transport should be minimised.
Waste strategy should link to energy strategy.
Some trading flexibility should be allowed at boundaries,

Resident

528 On page 56 the RSS states that it is up to each Waste Disposal Authority how they choose to manage the municipal waste arisings in their area. However, this piecemeal approach results in great discrepancies (disparity?) across the region as to which materials are collected from households and how much is reused, recycled etc. Some areas have facilities for collecting a whole range of materials from households, e.g.. Paper, cardboard, various types of plastic, tins, glass (jars and bottles), fabrics, green/garden waste, whereas other only collect one or two things. If householders in these latter areas want to recycle they have to take it to waste disposal sites them selves, which in some cases can be some miles away making it less sustainable. Others do not bother but just put everything in their ordinary household bin, which in turn more often than not goes to landfill with all its problems.

Resident

546 Should not be involved.

Resident

565 Area councils should do this.

Resident

***Response
Capacity***

Response WI comments

678 As long as that waste only comes from the area that the Waste Planning Authority covers (AND NOT from outside the area). This should be a provision for LOCAL waste only - not a facility for dumping waste from outside the area.

Resident

730 Only equitable strategy

Resident

911 Yes, if the land provided is used for MRF, MBT and resource recovery,

Resident

933 This can be managed locally. Sufficient land allocation has already been made. Any growth is estimated and does not appear to take account of the hierarchy principle of reduce and re-use which will reduce waste levels. Commercial and industrial waste management should be self-financing.

Resident

996 Yes, if the land provided is used for MRF, MBT and resource recovery.

Resident

***Response
Capacity***

Response WI comments

1132 It will reduce transport movements.

Resident

1320 But only after the public has been taught how to recycle properly, and has been given suitable opportunities for recycling.

Resident

W02 comments

Response Capacity Response W2

Harris Lamb Limited 935 Policy should recognise that it may be appropriate to maximise the use of existing facilities with established infrastructure and rail linkages and which serve an inter-regional or national catchment.

Business

Sustainable Rugby C/O N Sanderson 1000 N/A

Business

Waste Recycling Group Ltd 1339 WPAs should demonstrate how the supply of suitable land for waste management relates to the amounts of waste arising for treatment at different levels of the waste hierarchy. Where there is more land than needed for an individual WPA, this land should still be allocated and the policy should allow for development above the level needed to satisfy that WPAs subject to a clear demonstration of need and benefit.

Business

Rugby Friends of the Earth 476 Focus on proper management of resources. Indeed it would be a helpful start to rename this chapter "Resource Management".

Interest Group

Forestry Commission 511 As W1.

Interest Group

Response **Response W2**
Capacity

Localise West Midlands 703 Policies on waste management should be aligned with proposed resource use/waste management policies in the RES: if the word waste is replaced with the word resources then resource management is seen, as it should be, as a major contributor to economic activity rather than a space-consuming waste product. Waste management policies should therefore follow land use patterns necessary for comprehensive industrial symbiosis. Localising this to local authority level is probably beneficial.

Interest Group

West Midlands Friends of the Earth 917 An independent study should be used to forecast the expected range of household and C&I waste that will be produced. This should not be based on simplistic growth rate but based on modelling how much waste each type of household and business activity produces. The rise of commercial waste is driven by a switch of employment from manufacturing. This will gradually reduce as there will be far less manufacturing to switch from in the future. Manufacturing in the region will only survive changing to high value/low volume products. This needs incorporating in the modelling and should lead to a decline C&I waste arising in the region.

Interest Group

Ludlow 21 1020 A more flexible approach is required where the general principles outlined in W1 are followed where the processing / disposal sites can be realised but incorporating an element of waste 'trading' between WPAs so that unnecessary duplication of sites is avoided and the capacity of special sites is

Interest Group

Localise West Midlands 1071 Policies on waste management should be aligned with proposed resource use/waste management policies in the RES: if the word 'waste' is replaced with the word 'resources' then resource management is seen, as it should be, as a major contributor to economic activity rather than a space-consuming waste product. Waste management policies should therefore follow land use patterns necessary for comprehensive industrial symbiosis. Localising this to local authority level is probably beneficial, but the principle should be that resource loops are formed on as localised a basis as possible, which will vary for each

Interest Group

Response **Response W2**
Capacity

Worcestershire
County Council

479 It is agreed in general terms that each Waste Planning Authority should manage waste in accordance with the Waste Hierarchy. However, it should not be imposed rigidly as life-cycle analysis has demonstrated that in some instances some materials would be better used lower down the hierarchy. The Waste Hierarchy therefore should be applied but should still be subject to the caveat of sustainability.

Similarly, whilst the aim for the Region must be for each WPA to have sufficient land to manage the equivalent tonnage of waste arising within its boundary, it is not necessary for sufficient land equivalent to this level to be specifically "allocated" for these purposes in Local Development Documents.

Increasingly the preferred location for waste management is industrial estates and it is right that the quantum of land for waste management purposes should be part of the overall employment land requirement for a sub region. It is not necessary, however, to identify specific allocations of land within that overall quantum. Additionally, to allocate specific land for waste management purposes could stymie equally suitable land coming forward elsewhere so hampering the provision of sufficient land.

LA/Partnerships

Planning,
Economy &
Performance

562 It is agreed in general terms that each Waste Planning Authority (WPA) should manage waste in accordance with the Waste Hierarchy. However it should not be imposed rigidly as life-cycle analysis has demonstrated that in some instances some materials would be better used lower down the hierarchy. Similarly whilst the aim for the Region must be for each WPA to have sufficient land to manage the equivalent tonnage of waste arising within its boundary, it is not necessary for sufficient land equivalent to this level to be specifically "allocated" for these purposes in Local Development Documents. Increasingly the preferred location for waste management is industrial estates and it is right that the quantum of land for waste management purposes should be part of the overall employment land requirement for a sub region. It is not necessary, however, to identify specific allocations of land within that overall quantum. Additionally to allocate specific land for waste management purposes could stymie equally suitable land coming forward elsewhere so

LA/Partnerships

Worcestershire
County Council

646 No alternative proposed.

LA/Partnerships

Response Capacity ***Response W2***

Walsall Council 759 The RSS should accurately reflect what WPAs can do and set realistic goals which should subject to caveats.

LA/Partnerships

Wyre Forest District Council 762 N/A.

LA/Partnerships

Redditch Borough Council 1142 no alternative proposed

LA/Partnerships

Shrewsbury & Atcham Borough Council 1318 Response put forward by Shropshire County Council who are responsible for Waste Planning and Waste Development Frameworks.

LA/Partnerships

CEPOG 1340 The RSS should accurately reflect what WPAs can do, and set realistic goals.

LA/Partnerships

Response Capacity **Response W2**

Government Office for the West Midlands

587 We recognise there is likely to be limited scope for minimising the creation of waste through the planning system. However, there may be opportunities to encourage this in emerging RSS policies, particularly in relation to construction and demolition waste.

Other - please specify

Mercia Waste Management C/O Axis

654 The RSS should assess likely cross-authority boundary movements of waste and the broad locations for regional scale waste management facilities.

Professional

SITA C/O Axis

663 The RSS should assess likely cross region movements of waste and the broad locations for regional scale waste management.

Professional

1 If there isn't land allocated, then this will force authorities to think harder about other policy initiatives to reduce and re-use waste. Each WPA should allocate LESS land than is 'enough' as you put it. When will planners realise that they simply create the conditions that they then claim need planners to solve? Sounds like creating their own jobs, doesn't it? You can use the money saved from sacking planners to employ more environmental health officers to properly police illegal waste disposal

Resident

472 Many cities in parts of the world manage and indeed see it, waste as a commodity to be used usefully. The problem being of course the money it takes to utilize it.

Resident

***Response
Capacity*** ***Response W2***

517 It is a matter of distance
another waste planning authority may have facilities nearer than within own authority - common sense to distance should prevail.

Resident

546 Privatise entire industry

Resident

565 See above

Resident

911 N/A

Resident

933 Reduce and Re-use. Use business tax to finance waste management.

Resident

W03 comments

Response Capacity Response W3 comments

Veolia es
Birmingham Ltd

364 In practical terms this would seem to be the best way forward as logically, permissions will be easier to gain on an existing waste site than on a new site, but it needs to be recognised that new sites will have to be developed in order to meet the demand for growth in waste handling facilities.

Business

National Farmers
Union

726 It is sensible that suitable sites should be expanded. Segregated wastes could be reused successfully at small scale sites. As technology develops and new methods for re using and recycling wastes become available the RSS should be able to respond to a move away from traditional large sites if necessary. Therefore there ought to be some flexibility build into the policy

Business

Birmingham
International
Airport Limited

833 This should only be the case where existing sites are well managed and, from the Airport Company's point of view, pose no bird strike hazard for aircraft operations at Birmingham International Airport. Planning applications for the development of new, or existing, waste management sites within 13 kilometers of airports should be accompanied by a Bird Hazard Management Plan.

Business

Harris Lamb
Limited

935 Although maximisation of existing sites would be desirable it may be appropriate in certain circumstances to allocate new sites in suitable locations

Business

Response Capacity ***Response W3 comments***

Birmingham Chamber of Commerce & Industry Business

971 BCI agrees with the above criteria.

Confederation of West Midlands Chamber of Commerce Business

972 The Confederation agrees with the above criteria.

Sustainable Rugby C/O N Sanderson

1000 Yes, but if the site currently meets all of the required legislation and is sustainable. However, we believe waste minimisation is a much more acceptable than expanding such sites.

Business

National Farmers Union, West Midlands Region

1155 It is sensible that suitable sites should be expanded. Segregated wastes could be reused successfully at small scale sites. As technology develops and new methods for re using and recycling wastes become available the RSS should be able to respond to a move away from the traditional large sites if necessary. Therefore there ought to be some flexibility built into the policy.

Business

Rugby Branch of the Coventry & Warwickshire Ch Com Business

1160 If the current sites meet all current legislation and sustainability needs then it makes sense for continued usage rather than seeking new

Response ***Response*** ***W3 comments***
Capacity

Waste Recycling Group Ltd 1339 Suitable sites with an existing waste use should be safeguarded for either expansion or redevelopment for new forms of waste management. However, there will be many other sites that are suitable for waste development. Some of these should be allocated or safeguarded for such uses and for others a general criteria based approach should apply. Industrial sites with good road access and potential heat and power energy recovery opportunities nearby should be capable of being developed subject to criteria protecting amenity, ecology, etc.

Business

Rugby Friends of the Earth 476 Pale print caveat is accepted. Yes if they are capable of adaptation to newer technologies.

Interest Group

Health Planning and Development Agency 478 Economic promotion/sanction if WPA/local city council does not via own operations or private sector, e.g.. Recycling companies. Note, new industries should have waste contracts in place.

Interest Group

Warwickshire Rural Community Council 508 Warwickshire is consulting the community on this issue.

Interest Group

Forestry Commission 511 As W1 - adequate provision is needed to account for housing and employment growth, particularly in the proposed growth points.

Interest Group

Response Capacity ***Response W3 comments***

Atherstone Civic Society 563 Only if that use does not impact upon public amenity and the appearance of the countryside. Some communities have waste facilities on their doorstep which were established many years ago in a small way and have grown since. Opportunities should be taken to remove those.
Also some areas, because of their geology and history, get more un-neighbourly developments than others. Indeed some get a reputation for being places to dump rubbish. We would like to see the sharing out of waste facilities in a more equitable way. Here in North Warwickshire we have several ranging from an animal rendering plant to the massive land raising at Packington. In between there are a number of others. We are strongly of the opinion that waste should be dealt with close to where it is generated.

Interest Group

West Midlands Amenity Societies Association Interest Group 569 The qualification you give above is essential.

Campaign to Protect Rural England 642 Yes, but this response is conditional upon an environmental assessment of each site to determine its suitability for continued use or expansion

Interest Group

West Midlands Friends of the Earth 917 This may well be the case BUT a number of those sites have been identified for such use over a long period of time and as such may well be ready to be for review. We would also question the need for expansion where communities may have taken their share of the problem for long enough. We welcome the caveat in the above statement.

Interest Group

Response ***Response*** ***W3 comments***
Capacity

Campaign to
Protect Rural
England

923 The capacity of existing sites should be considered before new sites are open. However, the expansion of existing sites should be as rigorously scrutinised for environmental impacts as new sites so that the best option can be chosen.

Interest Group

Hereford &
Worcester
Gardens Trust

965 Herefordshire & Worcestershire are running out of capacity in existing sites. Alternative methods have to be devised.

Interest Group

Ludlow 21

1020 This depends on what is meant by "suitable sites". If this definition means these sites will have a low impact on the environment by virtue of their geographical location with regard to road access, local amenity, landscape etc. then it may be they should continue in waste management use but there should be no assumption that better sites are not available. Each WPA should therefore carry out a survey and assessment of all possible sites within its

Interest Group

West Midlands
Wildlife Trusts

1038 Future waste management facilities are likely to be very different to existing sites and it would not therefore seem appropriate to constrain their development by allocating only land adjacent to currently occupied sites.

Interest Group

Diocese of
Worcester

1093 Wherever possible

Interest Group

Response ***Response*** ***W3 comments***
Capacity

Regional Environment Partnership 1206 The likely sites for expansion are existing sites with environmental safeguards. Sufficient employment land also needs to be protected when growth changes land use from employment to housing to cater for sufficient waste transfer facilities.

Interest Group

Herefordshire Council 418 This would seem to be the least environmentally damaging method of dealing with increased capacity issues.

LA/Partnerships

Worcestershire County Council 479 Suitable sites with an existing waste management use should wherever possible be safeguarded. However, the expansion of such sites should not be the sole basis of the provision of waste management sites, for the same reasons as set out above. In particular, this could hold back other suitable sites from coming forward.

LA/Partnerships

Bromyard & Winslow Town Council 644 This would seem to be the least environmentally damaging method of dealing with increased capacity issues.

LA/Partnerships

Worcestershire County Council 646 Given the difficulties we have faced in Herefordshire and Worcestershire of securing new sites, it is essential that existing sites are safeguarded and where suitable and appropriate are expanded to meet local need. This is important to protect sites from potentially competing alternative uses. This must take account of the factors stated to minimise community and other opposition. However, due to the increasing need to seek alternative treatment technologies to landfill, it is imperative that new sites will need to be provided in addition to existing waste management facilities.

LA/Partnerships

Response ***Response*** ***W3 comments***
Capacity

Walsall Council 759 The starting point for any strategy for waste should be to consider the extent to which existing waste management facilities can meet future requirements. We therefore also agree that existing facilities should be safeguarded and protected against proposals for other uses, where they are well located and do not give rise to environmental or amenity problems. However not all sites are well located so the RSS should also support the relocation of poorly located

LA/Partnerships

Wyre Forest District Council 762 Broadly supportive of this approach subject to certain criteria including centrality to waste arisings.

LA/Partnerships

Rugby Borough Council 771 If the current sites meet all current legislation and sustainability needs then it makes sense for continued usage rather than seeking new.

LA/Partnerships

Clent Parish Council 783 During closed periods attention should be given to fly tipping by having spare skip outside

LA/Partnerships

Clifton upon Dunsmore Parish Council 953 If the current sites meet all current legislation and sustainability needs then it makes sense for continued usage rather than seeking new

LA/Partnerships

Response Capacity Response W3 comments

Telford & Wrekin Council

1018 Subject to the qualifying comment above.

LA/Partnerships

Inland Waterways Association (Birmingham)

1085 See comment to W1.

LA/Partnerships

Gloucestershire County Council

1109 Yes but new sites may come forward that are preferable to existing ones particularly given that many modern waste management activities can be accommodated in, e.g. industrial estates along with other B2 or B8 uses.

LA/Partnerships

Redditch Borough Council

1142 Yes given the difficulties we have faced in Herefordshire and Worcestershire of securing new sites, it is essential that existing sites are safeguarded and where suitable and appropriate are expanded to meet local need. This is important to protect sites from potentially competing alternative uses. Due to the increasing need to seek alternative treatment technologies to landfill, it is imperative that new sites will need to be provided in addition to existing waste management facilities.

LA/Partnerships

Dudley MBC

1150 It is sensible to safeguard and expand existing waste management sites (where appropriate to do so) - existing users know where they can be found, and surrounding land users are likely to be (relatively) accepting of their existence. However, there will be instances where an existing facility is operating at full capacity, cannot be expanded on site, or is not ideally located. Thus a two pronged approach is needed - safeguarding and expanding existing sites, and the creation of new sites where necessary.

LA/Partnerships

Response Capacity ***Response W3 comments***

South Worcestershire Authorities 1262 Given the experience of securing new sites, it is essential that existing sites are safeguarded and where suitable and appropriate to meet local need are expanded. This is important to protect sites from potentially competing alternative uses. This must take account of the factors stated to minimise community and other opposition.

LA/Partnerships

Shrewsbury & Atcham Borough Council 1318 Response put forward by Shropshire County Council who are responsible for Waste Planning and Waste Development Frameworks.

LA/Partnerships

Rugby Borough Council 1319 If the current sites meet all current legislation and sustainability needs then it makes sense for continued usage rather than seeking new.

LA/Partnerships

CEPOG 1340 Existing facilities should be safeguarded and protected against proposals for other uses, where they are well-located and do not give rise to environmental or amenity problems.
However, not all sites are well-located, so the RSS should also support the relocation of poorly-located facilities to sites that have better accessibility and/or less impact on amenity or the environment.
There is no reason why it should not include a general policy safeguarding existing waste management facilities of regional or sub-regional significance.

LA/Partnerships

Coventry City Council 1345 Existing sites and capacity will need to be considered alongside new provision. New targets will be provided by the revision of Waste Strategy 2000 expected early 2007. The requirement for expanded and new waste treatment facilities will be higher.

LA/Partnerships

Response Capacity ***Response W3 comments***

Stafford 116 Identifying specific sites may be helpful in some cases, be pragmatic.

Other - please specify

Natural England West Midlands 842 Natural England agrees that the basis on which WPAs identify sites should be based on safeguarding and expanding existing waste management sites as this avoids further land take.

Other - please specify

Environment Agency 1017 We agree that existing sites should where appropriate be safeguarded and identified for possible expansion in order to meet future demand. All applications for new or expanded waste facilities must be carefully assessed on a site by site basis. This will ensure the site continues to meet the necessary sustainability criteria, including an assessment and where necessary mitigation of environmental impacts.

Other - please specify

English Heritage 1141 We would underline the need for locally based environmental and amenity criteria to inform the expansion of existing sites.

Other - please specify

Mercia Waste Management C/O Axis 654 We agree with the approach to site selection advocated within Strategic Option W3.

We also feel that this option should emphasise that it is critical to the delivery of the new waste management infrastructure that WPAs identify/allocate specific land/sites for the full range of potential waste management uses.

Professional

Response Capacity ***Response W3 comments***

SITA C/O Axis 663 We agree with the approach to the site selection advocated within the Strategic Option W3. We consider that, such an approach would be entirely in accordance with the requirements of PPS10.

Professional

Home Builders Federation 1086 However they need to be capable of meeting a range of locally based environmental and amenity criteria and have good transport connections. If existing sites are already in use, it would be sensible to expand or safeguard them, subject to them being in sustainable locations.

Professional

1 As above

Resident

46 Yes, I think all existing sites should be considered for expansion. This will minimise any possible impact on sites which are not currently used for waste management but which may be in the future.

Resident

291 but we need new sites which particularly serve urban areas with minimal transportation required we need sufficient regional sites that will meet the total requirements of the region for all materials to minimise transport and exports

Resident

***Response
Capacity***

Response W3 comments

318 Waste identified environmentally suitable for rail freight/structure plan policy) Designated development / industrial rail freight sites (local transport plan) require potential to be realised

Resident

472 Many authorities have sites, tips that allow people to buy products bought to these tips, so re-cycled, instead of going to landfill sites

Resident

517 We need to think out of the box. Link waste with energy production.

Resident

575 The proposed development at Junction 7 goes against this principle in that the waste from this plant has still to go to Hill and Moor Landfill site and the building size proposed is no larger than the one which Severn Waste Services are planning to evacuate at Hill and Moor and turn over to business units. The County Council has only just completed the new access road to the Landfill site at Hill and Moor and part of the submission for government funding for the upgrade of the then B4084 to the A44 was to provide an easily accessible route for municipal waste vehicles. Why do Severn Waste want to impose a totally unnecessary building in what is essentially agricultural and residential land?

Resident

678 Exactly. No new sites should be used if existing sites are available. Environmental issues are important. Transport connections are much less important.

Resident

***Response
Capacity*** ***Response W3 comments***

807 Where available. E.g.. If housing cannot be built on landfill, could and incinerator be built there?

Resident

911 Yes, but if the site currently meets all of the required legislation and is sustainable. However, we believe waste minimisation is much more acceptable than expanding such sites.

Resident

933 If there is insufficient space, alternative suitable sites need to be found away from people. This tends to mean off the beaten track and so the standard of transport links may need to be compromised on.

Resident

Brandwood West
Neighbourhood
Forum

966 Waste management services should be priority and should be developed more. Much more recycling should be compulsory and there should be a lot more funding provided to the waste management so that schemes that help meet the targets.

Resident

996 Yes, but if the site currently meets all of the required legislation and is sustainable. However, we believe waste minimisation is a much more acceptable than expanding such sites.

Resident

Response ***Response W3 comments***
Capacity

1320 Keeping present sites means less disruption and less money wasted on new sites, which only be useful for the short term, like all new buildings etc.

Resident

W04 comments

Response Capacity Response W4 comments

The Tipton &
Coseley Building
Society

393 Particularly with regard to rail & water access.

Business

National Farmers
Union

726 Solutions for dealing with waste in rural areas and cutting down on waste transport should be supported. We welcome the inclusion of redundant farm buildings and their curtilage into the policy as it will allow the development of farm diversification schemes. There is also scope for small rural waste collection and recycling schemes that could be run from agricultural sites.
We are wary of the need for waste sites to be linked into good transport connections as in rural areas the transport infrastructure is often very poor.

Business

Birmingham
International
Airport Limited

833 The opportunity exists now to incorporate Aerodrome Safeguarding principles within the Waste Management Strategy for the West Midlands.

Business

Harris Lamb
Limited

935 It may also be appropriate to allocate sustainable Green Belt sites, served by existing infrastructure and rail linkages.

Business

Sustainable
Rugby C/O N
Sanderson

1000 Yes, but redundant farm buildings and their curtilage should only be used for composting and anaerobic digestion systems. Sewage works should retain space to cope with the additional demand from new housing.

Business

Response Capacity ***Response W4 comments***

The Federation of Small Businesses West Midlands Business	1105	We are concerned at the inclusion of industrial land and redundant farm buildings in this list because of future loss of potential employment land.
Waste Recycling Group Ltd	1339	We agree with the approach set out but wish to make the following additional comments. Population density is a good proxy for rates of waste arising and therefore general proximity to existing and planned development areas will be beneficial for waste management infrastructure. Transport connections are vital but it should be remembered that , other than for large regional or national scale facilities, rail and water will be relevant only to the export of recovered materials and residues. For thermal treatment plants there will be considerable benefit in being located adjacent to land uses with the potential to use waste heat. Electricity generated can usually be supplied into the local distribution grid but heat can only be used if there is a reasonably proximate customer, e.g.. A process industry, a district heating scheme, a large institutional user e.g.. Hospital, school, leisure centre, prison. It is much easier to build district heating in from the start than to retrofit, therefore proximity to development sites may be an advantage. Waste management should not be pushed towards contaminated land to any greater extent than any other development. Clearly the remediation of contaminated land is a benefit of any form of development but it adds costs and with waste those costs will be passed back largely to the communities served.
Business		
Rugby Friends of the Earth	476	The above criteria will be more or less relevant to different individual sites. Reduction of carbon footprints must also be taken into account.
Interest Group		
Health Planning and Development Agency	478	Land fill - end game. Waste management should have clean output hence industrial site suitable for size of operation only criteria.
Interest Group		

Response Capacity **Response W4 comments**

Forestry Commission

511 As W1

Interest Group

Atherstone Civic Society

563 Some of the above can be in attractive countryside. Previous industrial, derelict, and contaminated land can be in open countryside and have regenerated naturally. Redundant farm buildings can be in visible locations and can be close to historic buildings. So it is not safe to impose a set of general criteria. There must be an
- extensive environmental impact assessment.

Interest Group

Campaign to Protect Rural England

642 Although the list of criteria seems superficially inclusive, there will be many local circumstances where notably environment circumstances and/or the nature of the process involved may mitigate against its use. The stumbling block is still the broad-brush policy which lumps together all waste treatment/disposal operations each of which should have its own distinct criteria.

Interest Group

West Midlands Friends of the Earth

917 This is useful starting criterion BUT we need to be mindful that a whole host of new technologies and indeed industries will be created in this field of work. While, at the moment there is a not-in-my backyard approach to this aspect of planning that could change quickly.

Interest Group

Campaign to Protect Rural England

923 The criteria should include whether the site locations will reduce the distance waste travels. It should also refer specifically to landscape and tranquillity impacts. The compatible land uses identified may be more relevant to some waste facilities than others and their policy needs to ensure, for example, that the presence of redundant farm buildings which might be appropriate for a small anaerobic digestion are not used to justify a large commercial incinerator.

Interest Group

Response Capacity ***Response W4 comments***

Ludlow 21	1020	These are fair criteria for identifying new sites though all should be subject to exception criteria rather than be used as blanket definitions.
Interest Group		
Southern Staffordshire Partnership	1028	Concern over the implications for employment land needs if future waste management facilities need to take up part of the employment land allocations.
Interest Group		
West Midlands Wildlife Trusts	1038	The criteria shown above have some merit but they may not be adequate for all types of waste site in the future. Please also see the answer to the previous question.
Interest Group		
Diocese of Worcester	1093	Strongly agree
Interest Group		
Royal Society for the Protection of Birds	1147	Subject to appropriate safeguards, for example, some derelict land and mineral workings have developed significant biodiversity interest during "dormant" periods and this needs to be taken into account.
Interest Group		

<i>Response Capacity</i>	<i>Response</i>	<i>W4 comments</i>
Regional Environment Partnership	1206	The pressure for growth, particularly in option 3 requires the reallocation of industrial land to residential. In the MUAs the development of plans should consider waste management from the start so that exiting industrial land can be used for waste facility locations with adequate environmental safeguards.
Interest Group		
Herefordshire Council	418	Criteria suggested are acceptable.
LA/Partnerships		
Worcestershire County Council	646	These are all sound and relevant criteria. Where possible, these should be linked with the impacts of climate change. Due to the increasing need to seek alternative treatment technologies to landfill, it is imperative that new sites will need to be provided in addition to existing waste management facilities.
LA/Partnerships		
East Staffordshire Borough Council	736	Some concern is expressed that waste management facilities may have to be located on employment sites but there is no indication whether the reservoir figures for employment land in each district include an allowance for this, or whether it is expected that land is found in addition to employment land.
LA/Partnerships		
Walsall Council	759	We agree with the criteria but they could be better expressed. As with the safeguarding of sites, we do not see this as being exclusively the responsibility of WPAs. The RSS is part of the development plan for all of the WPAs in the region and should therefore include policies that are worded in such a way that they can be applied through the development control process as well as guidance on what WPAs should include in DPDs. See detailed response for amended wording for the policy criteria.
LA/Partnerships		

Response Capacity ***Response W4 comments***

Wyre Forest District Council

762 Broadly agree with the criteria based approach, but have the following comments 1. when defining "good accessibility" WPAs should have regard to centrality of waste arisings in order to reduce the need to travel in line with PPG13. 2. There might be a question over the practicalities of using water and rail at a sub-regional scale 3. it may be problematic to generalise about the compatibility of land uses as the relative appropriateness will depend on the nature of the operation and other material planning considerations.

LA/Partnerships

Little Comberton Parish Council

777 Mae better use of coal mines and quarries

LA/Partnerships

Clent Parish Council

783 but for rural areas retain local facilities.

LA/Partnerships

Staffordshire County Council

837 The listing of locational criteria is supported. However, in addition, the RSS should acknowledge that different approaches to site identification for different types of facilities will be required. Whilst it is difficult to prescribe the waste management technology for each site identified, the WPA will in some instances need to qualify which broad category of sites will be suitable for different waste streams and for different types of waste management facilities. For example, of particular concern among the criteria listed are waste facilities proposed within 'farm buildings and their curtilage' or within the Green Belt. Such sites may only be suitable for managing green waste/composting facilities or managing agricultural waste subject to a scale appropriate to the location and subject to the transport access.

With regard to new waste sites on active mineral working sites, the locational criteria should refer to co-location of multiple waste management processes at quarries where there are benefits in terms of diverting waste from landfill but subject to not restricting the ability to progressively restore land. In addition to the issue of prolonged restoration timescales, however, co-location also raises the possibility that when the landfill is closed and the landfill/mineral site is

LA/Partnerships

Response Capacity **Response W4 comments**

Sustainability West Midlands 925 These criteria are all sensible. However a further criterion should take precedence over all of them: the potential for the type and location of development proposed to support the top of the waste hierarchy: waste reduction, followed by reuse.

LA/Partnerships

Telford & Wrekin Council 1018 Yes, but policy needs to make clear whether all criteria should be met or just some. We would advocate that these are the criteria that should be taken into account, but not necessarily met in every case to provide for flexibility and maximise the number of sites that could come forwards.

LA/Partnerships

Inland Waterways Association (Birmingham) 1085 Being bulk the use of rail and water to transfer waste should be actively encouraged and if that means moving the waste outside the Region for incineration, that should be encouraged in preference to long distance road haulage within the Region.

LA/Partnerships

Gloucestershire County Council 1109 Yes but bearing in mind the priorities as set down in PPS10 paragraphs 20-21.

LA/Partnerships

Redditch Borough Council 1142 Yes these are all sound and relevant criteria. Where possible, these should be linked with the impacts of climate change. Due to the increasing need to seek alternative treatment technologies to landfill, it is imperative that new sites will need to be provided in addition to existing waste management facilities.

LA/Partnerships

Response Capacity ***Response W4 comments***

South Worcestershire Authorities 1262 these are all sound and relevant criteria. Where possible, these criteria should be weighted or ranked to support minimisation of impacts on climate change and underpin the proximity principle.

LA/Partnerships

Hinckley and Bosworth Borough Council 1317 Should also avoid causing nuisance and environmental impact on residential areas.

LA/Partnerships

Shrewsbury & Atcham Borough Council 1318 Response put forward by Shropshire County Council who are responsible for Waste Planning and Waste Development Frameworks.

LA/Partnerships

CEPOG 1340 The RSS should therefore include policies that are worded in such a way that they can be applied through the development control process, as well as guidance on what WPAs should include in DPDs. The criteria could also be better worded.

LA/Partnerships

Government Office for the West Midlands 587 The RSS is expected to identify needs for waste management facilities of sub-regional, regional or national significance. While we welcome the approach set out in the RSS whereby each WPA should provide enough capacity to manage waste equivalent to that which is produced within the WPA area, these would be sub-regionally, or possibly, regionally significant facilities. The RSS should therefore identify the broad locations expected to accommodate these

Other - please specify

Response Capacity **Response W4 comments**

Natural England West Midlands 842 Supports the criteria but also suggests that after-use and long term management of sites should also be specified, including the securing of landscape restoration and biodiversity enhancement particularly where sites are unsuitable for development or agriculture.

Other - please specify

Environment Agency 1017 there will be a need for new sites and we support the use of sustainability criteria to help choose the best sites. The criteria set out in W4 however do not make a distinction between the different waste management processes. Some waste management facilities are equivalent to any other industrial process and can be located in urban areas or even in mixed use development in suburbs.

Other - please specify

Advantage West Midlands 1076 There is clearly the potential for re-use of existing industrial land for waste processing and recycling uses as evidence by some existing case studies. In term of locations, facilities should be as close as possible to the sources of waste arising, or in central locations to avoid unnecessary transport. Again the location of housing growth will influence the locations for these facilities.
The Spatial Option need to recognise that the West Midlands has some waste management-related advantages over other regions:
* transport network;
* highly developed recycling facilities;
* Environmental Technologies Cluster opportunities;
* business engagement can also contribute to solving waste problems.
Advantage West Midlands' view is that RSS policy should not be too prescriptive.

Other - please specify

English Heritage 1141 Care should be taken that new sites do not prejudice the re-opening of mineral sites which may be required to source traditional building and roofing stone as per MPS1. We question the scope of the 'redundant farm buildings and their curtilage' especially where such buildings are of historic or architectural interest.

Other - please specify

<i>Response Capacity</i>	<i>Response</i>	<i>W4 comments</i>
Highways Agency	1251	New sites should as far as possible be situated in locations which do not require or encourage use of the strategic highway network as a means of access to them.
Other - please specify		
Mercia Waste Management C/O Axis	654	We generally agree with the criteria which WPAs should have regard to when identifying new sites for waste management facilities.
Professional		
SITA C/O Axis	663	We generally agree with the criteria which WPAs should have regard to when identifying new sites for waste management facilities. The criteria identified closely relate to those set out in PPS 10, which sets out the issues waste management facilities. However, we also consider that the list of criteria should include existing waste management facilities/sites.
Professional		
Network Rail	668	Additionally, regional energy from waste sites should be rail connected, and there should be the ability to take containerised waste to regional energy from waste sites by rail.
Professional		
Home Builders Federation	1086	This option is not clear. The HBF agrees with the criteria listed within the sentence above i.e. accessibility, good transport connections and compatible land uses. However, it is not clear if the bullet point list is suggesting what those 'compatible land uses' might be. The HBF is concerned that if this is the case, the suggestion of developing derelict land for new waste sites for example, could easily conflict with a planning authority's desire to develop derelict land
Professional		

***Response
Capacity***

Response W4 comments

1 You've put 'cartilage' when surely you mean 'curtilage'. Or are you just advocating you fill in farmers' ears with rubbish?

Resident

84 I would have thought it was obvious.

Resident

233 Also, impact on nearby residents must be negligible.

Resident

291 All essential rail or water transport very important we need local sites for each areas of significant population and industry important green belt and greenfield sites should not be destroyed lost or utilised.

Resident

318 Evidence rail freight vastly preferable because much lower CO2 produced tonne/km as GRAPH K attached

Resident

***Response
Capacity***

Response W4 comments

329 When considering transport connections, rail access must come high on the list because of the congestion on Worcestershire roads.

Resident

517 Not in rural areas as transport would destroy local infrastructure. Only in rural areas if linked to energy production and very local waste disposal.

Resident

678 Good transport connections is NOTMORE important than other issues (if the lorries have to drive a little further - so be it).

Resident

684 If possible, move more waste by canal, river or rail, and locate new sites at points where waste can be loaded/unloaded by these transport routes. Worcester sewage treatment works adjoins the Severn -it is a large site, and it may not all be in use or necessary for sewage treatment.

Resident

911 Yes, but redundant farm buildings and their curtilage should only be used for composting and anaerobic digestion systems. Sewage works should retain space to cope with the additional demand from new housing.

Resident

Response Capacity ***Response W4 comments***

933 As above

Resident

Brandwood West
Neighbourhood
Forum

966 I do not know enough about this result on the environmental issues from this to answer.

Resident

996 Yes, but redundant farm buildings and their cartilage should only be used for composting and anaerobic digestion systems. Sewage works should retain space to cope with the additional demand from new housing.

Resident

1320 England is a very small country. There is no room left for new waste sites - or houses.

Resident

W05 comments

Response Capacity Response W5

Berkley Contract Services Limited 705 The criteria is far too simple. My experience of the Worcestershire County Council is that they abuse these principles and presumably others do the same. The term "industrial land use" is far too loose. Waste facilities are inherently unhealthy. They must be kept well away from housing and other workplaces and this limits their location. Transport also is a key driver in terms of location and cost - hence smaller more local facilities should be the norm to reduce transport cost for future decades.

Business

Birmingham International Airport Limited 833 As suggested for W4 above.

Business

Birmingham Chamber of Commerce & Industry Business 971 BCI agrees with the above criteria.

Confederation of West Midlands Chamber of Commerce Business 972 The Confederation agrees with the above criteria.

The Federation of Small Businesses West Midlands Business 1105 Depends on type of waste facility, for instance composting, could be Greenfield near to farm land or a farm that has the necessary infrastructure.

Response Capacity ***Response W5***

Waste Recycling Group Ltd

1339 It is suggested that proximity to potential heat users should be a criteria. Also there should be support for locating facilities where they may be able to co-ordinate with existing or other planned material reclamation. E.g. (1) thermal treatment plants produce around 3% by input weight of scrap metal outputs and so co-location with existing scrap metal businesses may be beneficial (2) bottom ashes from thermal treatment can be re-used as aggregate substitutes, so co-location with aggregates businesses may be beneficial.

Business

Rugby Friends of the Earth

476 Balance of volume required to employ bigger facilities efficiently and local management of locally produced excess of resources. Proximity principle and minimise carbon footprint.

Interest Group

Health Planning and Development Agency

478 On outskirts of town/city. With all methods of use on site, e.g.. Incinerator, process plant, etc. There should be a maximum raw waste storage figure.

Interest Group

Forestry Commission

511 As W1

Interest Group

Atherstone Civic Society

563 as above

Interest Group

Response Capacity ***Response W5***

West Midlands
Amenity
Societies
Association

569 NOT on Green Belt - surely one of the objectives of Green Belt is to provide a green and pleasant space around our major conurbations for people to enjoy.
The openness of land is not the only constraint - what about the air pollution?

Interest Group

Campaign to
Protect Rural
England

923 See above.

Interest Group

West Midlands
Wildlife Trusts

1038 See above

Interest Group

Regional
Environment
Partnership

1206 Bullet 6 - good public and other transport connections.

Interest Group

Transport 2000
West Midlands

1292 Waste sites should be easily accessible both from urban areas and from the strategic transport network, road and rail and indeed canals.

Interest Group

Response Capacity **Response W5**

Worcestershire
County Council

479 We do not agree with the criteria set out in the revision document for the basis of identifying suitable sites. The criteria should be more in line with those set out in the Council's Preferred Waste Core Strategy, in particular Policy 10 which directs facilities to industrial sites and Policy 11 which sets out criteria for assessing activities not able to be undertaken on industrial sites. Policies 10 and 11 are set out below for information.

LA/Partnerships

Planning,
Economy &
Performance

562 Proposals for waste management facilities which are of a scale, size or nature which cannot be located on land designated for B8 or B2 industrial purposes will have to demonstrate (a) why it cannot be located on such land, and (b) the suitability of any alternative site using the following search sequence within the catchment of the waste materials proposed to be managed: * starting with land with current use rights for waste management purposes, then * working landfills or quarries where the proposal is both operationally related to the existing use of land and for a temporary period commensurate with the operational use of the site and *previously developed land and redundant agricultural and forestry buildings and their curtilage and *other land.

In every case sites will only be acceptable if they are not affected by one or more of the following primary constraints or two or more of the following secondary constraints, unless (a) the adverse effects on the constraint(s) constitutes a material consideration sufficient to override the constraints or c) there is no suitable lesser constrained land in the County.

LA/Partnerships

Worcestershire
County Council

646 See comments in response to Q4.

LA/Partnerships

Walsall Council

759 We have no objection to the criteria, but have concerns about the way that they are worded and expressed.

LA/Partnerships

Response Capacity ***Response W5***

Wyre Forest District Council 762 N/A.

LA/Partnerships

Gloucestershire County Council 1109 Green belt sites may be appropriate in some instances, given that this land is often close to the source of major waste arising. Note, PPS Key Planning Objective6.

LA/Partnerships

Redditch Borough Council 1142 response to W4

LA/Partnerships

South Worcestershire Authorities 1262 See comments in response to W4

LA/Partnerships

Shrewsbury & Atcham Borough Council 1318 Response put forward by Shropshire County Council who are responsible for Waste Planning and Waste Development Frameworks.

LA/Partnerships

Response Capacity **Response W5**

CEPOG 1340 We have no objection to the criteria, but have concerns about the way that they are worded and expressed.

LA/Partnerships

Coventry City Council 1345 Yes

LA/Partnerships

Stafford 116 Where there are alternatives, public opinion may be valuable.

Other - please specify

Environment Agency 1017 the criteria need to reflect the complex nature of identifying waste management sites. In addition the criteria should set out constraints to development as a waste site as these facilities are often in flood plains.
The suitability of new sites should be reviewed using a risk assessment approach.

Other - please specify

Mercia Waste Management C/O Axis 654 The inclusion of existing waste management facilities/sites within the criteria set out under strategic option W4 would accord with the requirements of Strategic Option W3. In addition, it would also reflect the requirements of paragraph 7, indent 6 of PPS10 which indicates that Regional Planning Bodies should take account of "opportunities to accommodate new or expanded waste management facilities, including for the disposal of residues from treated wastes". Such an approach would also accord with the provisions of paragraph 20 (indent 2) of PPS10 which indicates that in searching for suitable sites for new waste management facilities waste planning authorities should "...look for opportunities to co-locate facilities together".

Professional

Response Capacity ***Response W5***

SITA C/O Axis 663 The inclusion of existing waste management facilities/sites within the criteria set out under Strategic Option W4, would accord with the requirements of Strategic Option W3. In addition it would also reflect the requirements of PPS 10.

Professional

Home Builders Federation 1086 See comments above

Professional

1 Reduce the number and size of areas available to dump and forget about 'waste.' Force us to reduce the amount of materials we buy and throw away, out of sight, out of mind. Set diminishing targets year on year to tighten the screw.

Resident

678 (1) Use existing facilities
(2) Ensure that any facility used is at least half a mile from ANY domestic residences.

Resident

911 N/A

Resident

***Response
Capacity*** ***Response W5***

933 Open space, away from people, nobody wants to be next to waste/rubbish

Resident

W06 comments

Response Capacity Response W6 comments

Veolia es
Birmingham Ltd

364 With the correct safeguards that any planning permission would bring, development on green belt land should not be dismissed.

Business

Berkley Contract
Services Limited

705 BUT, the key issue here is that they should not affect people and communities.

Business

National Farmers
Union

726 If the scenarios for the expansion of the West Midlands housing stock are to be accommodated then it will be necessary for a range of infrastructure provisions to be developed within the Greenbelt. It is important that communities take responsibility for their own waste and that waste is treated as close to the source of its generation as possible.
Existing and redundant agricultural sites may be suitable for some waste recycling and processing uses.

Business

Hertfordshire &
Worcs Chamber
of Commerce

808 In rural areas, or where no alternative site exist a waste facility could be built in open countryside or in greenbelt. This flexibility should be provided locally through the Local development Frameworks.

Business

Response ***Response*** ***W6 comments***
Capacity

Birmingham
International
Airport Limited

833 Whilst the Airport Company appreciates the obvious growing need for waste management facilities, a sequential test approach which incorporates Aerodrome Safeguarding, should be considered.

Business

Harris Lamb
Limited

935 But previously developed sites in the Green Belt are to be preferred.

Business

Birmingham
Chamber of
Commerce &
Industry
Business

971 BCI believes that such decisions should be taken at a local level, with each planning application for waste sites examined on its own merits.

Confederation of
West Midlands
Chamber of
Commerce
Business

972 The Confederation believes that such decisions should be taken at a local level, with each planning application for waste sites examined on its own merits.

Sustainable
Rugby C/O N
Sanderson

1000 Provision within the Greenbelt should be avoided, except where the waste management facility is compatible with the Greenbelt for example: composting anaerobic digestion. One could consider waste recovery facilities within the Greenbelt on Brownfield sites, with the normal environmental impact

Business

Response Capacity ***Response W6 comments***

The Federation of Small Businesses West Midlands 1105 We would agree with this. An FSB member is looking for sites to set up a 'Soils Hospital'. A minimum of 3 acres is required, where contaminated land can be mixed with water, lime etc to 'cure' it from the contamination, it is a slow process - it needs to be turned and mixed, and reach high enough temperatures make the soil safe. Helpful bugs and bacteria can also be introduced which will 'eat' some contaminants. However, there are not many suitable sites

Business

Rugby Branch of the Coventry & Warwickshire Ch Com Business 1160 Only enclosed facilities so that the amenity of the area is not overly affected

Waste Recycling Group Ltd 1339 But Green Belt land should not be used unless there is no clear alternative site not in the Green Belt.

Business

Rugby Friends of the Earth 476 But only if all three conditions are strictly imposed, including the last.

Interest Group

Health Planning and Development Agency 478 A self contained site with all above, Q W5.

Interest Group

<i>Response Capacity</i>	<i>Response</i>	<i>W6 comments</i>
Forestry Commission	511	There is a need to support wood supply and related processing industries close to where material is likely to be used (e.g.. Urban fringe - products such as wood/fuel/wood pellets.
Interest Group		
Atherstone Civic Society	563	Waste management facilities should not be visible, either in or beyond the Green Belt. The site must be chosen very carefully. However, it is essential to find sites that are close to the producers of the waste. Communities should almost have ownership of their own waste, to make them more conscious of its impact and to aid re-cycling.
Interest Group		
Campaign to Protect Rural England	642	the policy is much too broadly-based and inclusive of the whole range of waste management facilities. Where the "waste management" involved erection of buildings for such semi-industrial purposes then there would be fundamental objections by virtue of the loss of openness, the avoidance of which is central to Green Belt policy.
Interest Group		
Monics Walk Group	871	why no pyrolysis plants to avoid emissions.
Interest Group		
West Midlands Friends of the Earth	917	Again there is the proximity principle to consider here along with the intrusion into the Green Belt. However as the new technologies improve in design and economic performance, some smaller uses may be appropriate and help the local community as well as diversification of the local economy.
Interest Group		

Response Capacity ***Response W6 comments***

Campaign to Protect Rural England

923 In general the openness and objectives of green belt could be compatible with some small scale waste management facilities, all other options having been considered. However, the scale and nature of such facilities would be critical and without very clear guidance in RSS as to what those facilities might be we would be concerned that large, inappropriate proposals would come forward that would harm the greenbelt.

Interest Group

Hereford & Worcester Gardens Trust

965 This would be the thin end of a potentially environmentally disastrous wedge. It would set a precedent for the future. Alternative solutions have to be found.

Interest Group

Ludlow 21

1020 The options in this question appear to contradict each other and may in, practice be very difficult to combine successfully. However if they can all be achieved with local agreement they should be implemented.

Interest Group

Diocese of Worcester

1093 open land - only if absolutely necessary
If it is necessary, then the 3 stated criteria should apply

Interest Group

Royal Society for the Protection of Birds

1147 Subject also to not adversely affecting biodiversity interest.

Interest Group

Response Capacity ***Response W6 comments***

Regional Environment Partnership 1206 In exceptional circumstances in line with national guidance and PPS 10 and environmental safeguards. Any development would have adverse environmental effects, but this would need to be balanced with the delivery of the regional waste strategy.

Interest Group

Herefordshire Council 418 In principle waste management facilities could be permitted on open land, including Green Belt, when the facility was close to the communities producing the waste; where no alternative site exists and where it would not harm the openness of the land or the objectives of the Green Belt. The protection of the general environment should also be considered in identifying suitable locations and a degree of flexibility should be allowed for individual cases, as ideally, such facilities should be located in more appropriate locations.

LA/Partnerships

Worcestershire County Council 479 The submitted Waste Core Strategy discusses the waste management activities in the Green Belt and it is commended to the RPB as the basis for a more strategic policy to guide waste management within the Green Belt.

The basis of Policy 12 - Development in the Green Belt

Waste related development will be appropriate in the Green Belt where it would maintain openness and would not conflict with the purposes of, including land in the Green Belt..

LA/Partnerships

Response Capacity ***Response W6 comments***

Planning,
Economy &
Performance

562 Waste related development will be appropriate in the Green Belt where it would maintain openness and would not conflict with the purposes of, including land in the Green Belt and (i) it is land filling and/or land raising in order to restore mineral workings or other degraded, contaminated or derelict to a higher environmental standard and facilitate an after use appropriate to a Green belt location ,or (ii) it is essential for the purposes of improving land to facilitate an after use appropriate to the Green Belt or (iii) it involves the management of waste at either land filling or land raising sites provided that the proposed development is operationally related to the waste disposal operation and is for a temporary period commensurate with the operational life of the landfill or land raising site or (iv) it is open windrow composting or (v) it involves the reuse or redevelopment of land or buildings where this does not have a materially greater impact than the present use, or (vi) very special circumstances exist justifying inappropriate development where harm by reason of inappropriateness and any other harm is clearly outweighed by other considerations. It will be for the applicant to demonstrate that very special

LA/Partnerships

Bromyard &
Winslow Town
Council

644 Dependent on local services.

LA/Partnerships

Worcestershire
County Council

646 As noted in response to Q4. It should be noted however that some communities object to the siting of new waste facilities close to residential properties.

LA/Partnerships

Kenilworth Town
Council

685 Provided that all the listed criteria are met and Green Belt policies are satisfied.

LA/Partnerships

Response Capacity ***Response W6 comments***

Walsall Council 759 Subject to the criteria above and the caveats below. We agree that provision on open land cannot be ruled out. Indeed some waste management facilities can only be located on open land. In some locations, whether or not they are in the Green Belt, any built development would be intrusive or damaging, and we do not accept that in such circumstances waste management should be treated as a "special case".

LA/Partnerships

Wyre Forest District Council 762 The suggested criteria appear to provide appropriate safeguards.

LA/Partnerships

Rugby Borough Council 771 Only enclosed facilities so that the amenity of the area is not overly affected.

LA/Partnerships

Clent Parish Council 783 alternative must be sought we do not wish to see a proliferation of sites collection at source a priority

LA/Partnerships

Staffordshire County Council 837 Some waste management facilities may need to be located away from the immediate surrounds of people and sensitive environmental receptors, but not so far away that the transport of the waste becomes an issue in its own right. In the context of Staffordshire, the appropriate locations, for example on the fringes of the MUAs, would affect the South Staffordshire Green Belt and open countryside. The RSS should protect the Green Belt and the open countryside by giving a better direction of/developing more detailed policies targeted at specifying types of waste management facility that may be

LA/Partnerships

Response Capacity ***Response W6 comments***

Clifton upon
Dunsmore Parish
Council

953 Only enclosed facilities so that the amenity of the area is not overly affected

LA/Partnerships

Telford & Wrekin
Council

1018 Subject to environmental safeguards. We suggest consideration is given to the need for a separate policy on open windrows with qualifications about sitting away from occupied buildings.

LA/Partnerships

Stratford-on-Avon
District Council

1121 Green Belt sites should only be considered as the final option as part of a sequential approach, i.e.. If there are no alternative "non green belt" sites which meet the criteria set out in W4.

LA/Partnerships

Redditch Borough
Council

1142 yes as noted in response to question W4. It should be noted however that some communities object to the siting of new waste facilities close to residential properties.

LA/Partnerships

Dudley MBC

1150 The above is a "very qualified yes" on the basis that the stated bullet point criteria should be adhered to but Dudley MBC holds a strong policy position (in line with national planning guidance) in terms of safeguarding the openness and character of its Green Belt and other open spaces.

LA/Partnerships

Response Capacity Response W6 comments

Shrewsbury & Atcham Borough Council

1318 Response put forward by Shropshire County Council who are responsible for Waste Planning and Waste Development Frameworks.

LA/Partnerships

Rugby Borough Council

1319 Only enclosed facilities so that the amenity of the area is not overly affected.

LA/Partnerships

CEPOG

1340 We agree that provision on open land cannot be ruled out. In some locations any built development would be intrusive or damaging, and we do not accept that waste management should be treated as a "special case."

LA/Partnerships

Natural England West Midlands

842 Waste Management facilities will often be located on open land including within Green Belt and will normally have some harmful impacts on local landscapes and environmental assets. However, such developments could be located sustainably if they meet environmental criteria and the openness of land is maintained. After-use and long term management must be specified and any opportunities for landscape and habitat restoration should be taken.

Other - please specify

Environment Agency

1017 The green belt exists to protect open countryside from development but there may be circumstances where these locations are most sustainable for waste facilities. Again we consider the nature of the facility should be part of the criteria when deciding what is appropriate in open countryside.

Other - please specify

Response Capacity ***Response W6 comments***

English Heritage 1141 And has regard to potential site specific impacts on natural, built and historic assets.

Other - please specify

Mercia Waste Management C/O Axis 654 We acknowledge that any development could impact upon the openness of land within the Green Belt. However, waste management facilities would not necessarily be in conflict with the objectives of including land within the green belt.

It should also be noted there may be special circumstances where a waste management facility could be justified in a Green Belt location.

Professional

SITA C/O Axis 663 We disagree with the second bullet point as a site within the Green Belt could be preferable in practically all other regards to a non-Green Belt site. We also consider that Strategic Option W6 fails to fully take account of the guidance contained within PPS10 paragraph 3 (indent 6) which sets out the key planning objectives in respect of Green Belt.
The specific locational needs of certain waste management facilities are currently not fully addressed by Strategic Operation W6.

Professional

1 Why should our countryside suffer when we are simply consuming more and more with no regard for what happens to it when it's no longer fashionable?

Resident

46 I think that as long as the environmental costs are fully considered and accounted for within any proposal that this would be acceptable, provided that the land is returned to open land once the facilities cease to function. Obviously no land of ecological significance would ever be considered.

Resident

***Response
Capacity*** ***Response W6 comments***

233 BUT ONLY IF ALL THE ABOVE OBJECTIVES WERE MET.

Resident

291 We should find brown sites old industrial sites - green belt areas - open areas - wildlife - quality of rivers - woodland are all vital to the quality of life.

Resident

329 Greenbelt must be protected from any further erosion through landfill or housing. It is extremely important to local people of Worcester, Droitwich and Bromsgrove that those areas do not become one huge conurbation.

Resident

354 It would be better to use a derelict factory or disused farm site and therefore spread into green belt land than a derelict site in among the community. So long as it is maintained without being an "eyesore" or blot on the landscape.

Resident

472 Landfill sites could be almost obsolete if handled wisely.

Resident

***Response
Capacity***

Response W6 comments

517 Yes and No, only where linked to local energy production.

Resident

678 Keep it away from where people live.

Resident

730 Only where brownfield sites are unavailable

Resident

807 Only as an absolute last resort, and not on green belt land

Resident

911 Provision within the Greenbelt should be avoided, except where the waste management facility is compatible with the Greenbelt for example: composting anaerobic digestion. One could consider waste recovery facilities within the Greenbelt of Brownfield sites, with the normal environmental impact

Resident

***Response
Capacity*** ***Response W6 comments***

933 Not close to communities

Resident

Brandwood West
Neighbourhood
Forum

966 Yes and No. Yes to proximity of the site was regulated and open to the public but not 'Open land for dumping'. No to Green Belt. Industrial regions - absolutely. We have a large depot very close to us - Lifford. This could be a 5 minute walk if the back end of the site had an entrance made where people could walk their dogs across the River Rea and take a bag of paper or glass with them and place it either green wheelie bins that could be emptied every few hours or large versions.

Resident

996 Provision within the greenbelt should be avoided, except where the waste management facility is compatible with the greenbelt for example: composting anaerobic digestion. One could consider waste recovery facilities within the greenbelt on Brownfield sites, with the normal environmental impact

Resident

1132 Yes, but the requirement that it would not harm the openness of land or the objectives of Green Belt must be paramount.

Resident

1255 n

Resident

W07 comments

Response Capacity Response W7

Veolia es
Birmingham Ltd

364 To assume no growth in waste arisings from 2011 other than from new housing is, I believe unrealistic. I would expect to see a continued 1% growth rate per annum from existing households until at least 2025/26.

Business

The Tipton &
Coseley Building
Society

393 My comments in H1 apply. If there are not enough waste disposal facilities, this may limit the number of houses to be built.

Business

Berkley Contract
Services Limited

705 No

Business

Sustainable
Rugby C/O N
Sanderson

1000 We should pursue policies that actively encourage diversion from landfill and support the principle of 'the polluter pay' with an increase in charges for landfill.

Business

Response Capacity **Response W7**

Waste Recycling Group Ltd 1339 The definitions of Diversion and Residual waste should be set out. In our opinion "Diverted" waste should be any MSW not sent to landfill - i.e.. Material re-used, recycled, composted or having energy recovered from it. It is unclear whether "Residual" waste includes the residues from treatment processes. The policy should also not operate to limit the capacity of recycling, composting and treatment plants to a level which just meets diversion targets. Larger capacities will enable even more material to be diverted from landfill, with a beneficial effect in terms of the waste hierarchy. There will always be the need to landfill some raw waste because it will be incapable of re-use, recycling or energy recovery. With these provisos we support the manner in which the tables have been prepared. We generally support housing option 3 as the most realistic means of heading off problems caused by undersupply of housing in a region with a growing economy.

Business

Burton upon Trent Civic Society 361 Don't really understand the figures: they are too large a scale. However, we are concerned that you have allowed for growth generated by new households. If most of the growth in households comes from smaller household sizes rather than population growth, surely there should be a quid pro quo in a reduction in waste generated by existing households as they reduce in size. We would like to see more in the RSS about just how the region intends to meet Government targets for diverting biodegradable waste from landfill.

Interest Group

Rugby Friends of the Earth 476 Predictions of increasing waste are not supported by evidence. Municipal waste can be and must be reduced. We should not provide unnecessary waste processing facilities.

Interest Group

Health Planning and Development Agency 478 Separate Staffordshire from Stoke-on-Trent. It is not fair on Staffordshire.

Interest Group

Response Capacity **Response W7**

Forestry Commission

511 Residual figures seem comparable/fairly static across all options, but how does this relate to site/waste processing provision.

Interest Group

Atherstone Civic Society

563 no

Interest Group

West Midlands Amenity Societies Association

569 It is acceptable that different "rules" should be applied to the major waste streams - municipal, and commercial and industrial. In the case of municipal waste from domestic properties, there is a case for recycling. This requires a number of different types of waste to be dealt with. Collection practice varies. Some authorities provide "wheelie bins" while others rely on "plastic bags". From a planning prospective the key to this refuse stream is the provision of covered storage. For many years it was a requirement in Coventry that planning applications for new development had to show where "bins" were to be stored, and the design of the storage areas. However if municipal refuse is to be sorted by the residents, the requirement for a range of receptacles, and for them to be covered (to prevent animal penetration of the contents) will give rise to a major visual and amenity problem. It is considered that this should not be the subject of Regional Policy.
A key question remains - can an authority in the MUA allocate land in its area to manage its own municipal waste? There is no simple answer because there will always be some waste that will have to go to landfill. If there is no "hole in the ground", this will not be possible. The conclusion must be that an approach, similar to that of minerals, should be adopted.
We are concerned that you have allowed for growth by new households. If most of the growth in households comes from smaller household sizes rather than population growth, surely there should be a quid pro quo in a reduction in waste generated by existing households as they reduce in size. We would like to see more in the RSS (maybe it is some other document) about just HOW the region intends to meet Government targets for diverting biodegradable waste from landfill.

Interest Group

Response Capacity **Response W7**

Hampton-in-Arden Society 610 If municipal refuse is to be sorted by the residents, the requirement for a range of receptacles, and for them to be covered (to prevent animal penetration of the contents) will give rise to a major visual and amenity problem. It is considered that this should not be the subject of Regional Policy. Planning applications for commercial and industrial development have required detailed information about the number of employees, car parking facilities, commercial vehicle movements, and waste disposal. The ability of a developer to provide detailed answers to these questions is very limited. It is not normal for a developer to be precise about any of these matters, particularly if the occupier of a development is not known. Even when Industrial Development certificates were required, the information provided was not precise. Another problem to be faced by a planning authority is whether it has in-house expertise to test whether the answers given are correct. If the developer proposes to use a waste disposal company, should that answer make the application invalid if detailed quantities are not specified? What has been proposed (in W17) is unreasonable.

Interest Group

Campaign to Protect Rural England 642 CPRE (Staffordshire's comment is that these figures seem to show the unacceptable levels of municipal waste arisings as far ahead as 2026, with the inevitable question of whether the waste strategy is adequate and urgent enough.

Interest Group

Cannock Chase Area of Outstanding Natural Beauty Interest Group 733 There is still active mineral working within the area and a presumption to use these worked areas for infill would be inappropriate to the designation of the area.

Ramblers Association 784 No

Interest Group

Response Capacity **Response W7**

Dudley Free Church Liaison Council

867 No comment.

Interest Group

West Midlands Friends of the Earth

917 It is important that the region is not over supplied with cheap disposal facilities that would discourage waste reduction. In producing their strategies Local Councils then to be biased toward overestimating their requirements. The waste projections need to be challenging but achievable. It is possible for policy makers to dictate exactly how many new homes are built. The amount of waste produced by those households over the next tow decades can only be guessed at. The tables must reflect this uncertainty by replacing the exact guesses with ranges within which the total amount of waste is likely to fall. The amount of waste we generate is highly dependant on economic well-being, the progress of the environmental revolution, the birth rate and even the weather.
It is over simplistic to assume that for every 100,000 planned new homes waste increases by the average produced by 100,000 existing homes. Non-household waste should be modelled separately as it is highly erratic being driven by council's policies on taking trade waste. It could be assumed to be 400,000 tonnes per year +/-10%.
In Option 1 the rate of housing growth is slightly less than the current rate. It would seem sensible to expect household waste growth to be around zero but prudent to allow for a 1% year-on-year decline until 2011.
In Opiton2 the rate of housing growth is about 0.2% greater. The rise in household waste should be less due to the requirement for higher density and the smaller household size.
In Option 3 the range of uncertainty widens. Tables should be produced to allow for waste growth between a 1% annual decline and a 1.4% increase each year.
We would go for C+++ with year on year incremental improvements on this. There is a bottom line driver for businesses to get more out of their post

Interest Group

Campaign to Protect Rural England

923 Clearly the higher levels of housing increase pressure on waste facilities. It is therefore, critical that if these are adopted, additional measures are taken in the local authorities concerned to maximise recycling and waste reduction.

Interest Group

Response Capacity **Response W7**

Ludlow 21 1020 By 2025 we should be aiming for the same or better apportionment than our fellow European states.

Interest Group

Worcestershire
County Council

479 Yes. The figures are incorrect.

The 2005-06 tonnages shown in the Waste section of the Revision Report for Worcestershire County Council differ from the Council's own figures. This is important because it overestimates the need for landfill. The same distortion is carried through to Options Two and Three. If this difference is common to all the Waste Disposal Authorities, the overestimation of landfill space needed in the whole Region will be important and misleading.

LA/Partnerships

Warwickshire
County Council

512 The size and number of municipal waste facilities will depend on the technology chosen by the WDA. Some technologies are commercially viable managing 50,000 tonnes of waste per year in which case just over 50 facilities would be needed in the Region (i.e. 5 in Warwickshire). The spatial strategy of provision of facilities in Warwickshire will be brought forward through the Warwickshire Waste Development Framework's Core Strategy.

LA/Partnerships

Planning,
Economy &
Performance

562 Yes, the figures are incorrect. The key point for members to be aware of is in relation to Municipal Waste. This is important because it over-estimates the need for landfill. The same distortion is carried through into Options 2 and 3. The difference appears to have arisen because the report does not include the Council's figure for EfW and treats the Soil and Rubble from Household Waste Sites as Inert/C & D waste, despite the fact that for the purposes of the Landfill Allowance Trading Scheme it counts as MSW which the Council is recycling. It is recommended therefore that the RPB be requested to amend the table on page 20 to show the Council's estimate for Worcestershire's residual waste for 2005-06 of 193,441 tonnes not the current figure of 238,000 tonnes and that the tables for Housing Options 2 and 3 are recalculated accordingly.

LA/Partnerships

Response Capacity **Response W7**

Pershore town council

583 in Worcestershire it will be 8yrs before things start to improve. In Wychavon we are led to believe it will be sooner.

LA/Partnerships

Worcestershire County Council

646 There is concern to ensure that the stated figures are correctly defined as this will impact upon subsequent modelling and delivery. The following comments represent the county wide position and are included after consultation with colleagues in the WDA. W7(1) the narrative preceding the tables states that the tables show amount of household waste arising. However, the tables state that the tables show municipal. The classification of waste being modelled is critical, and will generate different figures as illustrated in the table below. W7(2) Baseline figures for the year 2005/6 do not reflect actuals; the actual figures for Worcestershire are shown in the table below.

LA/Partnerships

Walsall Council

759 The Council supports Housing Option 2. It should be possible to WPAs to monitor performance against these targets, as the amounts of municipal waste managed using different methods is already a LDF Core Output Indicator. However, basing the proposed apportionments on the Housing options means that there is actually very little difference between the tonnages of waste requiring management under each of the options. There is a risk that RPB could be criticised for not identifying a reasonable choice of options. Whilst we would not necessarily support a higher rate of diversion than that suggested for Housing Option 2, such options should perhaps have been tested.

LA/Partnerships

Wyre Forest District Council

762 WFDC welcome the clarification offered to the Waste Planning Authorities as a means of understanding the scale of provision to be accommodated in Waste LDFs.

LA/Partnerships

Response Capacity **Response W7**

Powys County Council 838 The Council would question the increase in domestic waste arising in Shropshire and Herefordshire from housing option 2 to 3 given that the level of housing proposed for these Counties in these options is unchanged.

LA/Partnerships

Telford & Wrekin Council 1018 These tables are useful as a guide and it is essential for Policy to have a clear and consistent methodology, but local flexibility is required to deal with local circumstances, recycling and treatment arrangements.

LA/Partnerships

Inland Waterways Association (Birmingham) 1085 No further comment.

LA/Partnerships

Redditch Borough Council 1142 There is concern to ensure that the stated figures are correctly defined as this will impact upon subsequent modelling and delivery. The following comments represent the county wide position and are included after consultation with colleagues in the WDA. The narrative preceding the tables states that the tables show amount of household waste arising. However, the tables state that the tables show municipal. The classification of waste being modelled is critical, and will generate different figures as illustrated in the table below. Baseline figures for the year 2005/6 do not reflect actuals; the actual figures for Worcestershire are shown in the table below.

	Diversion	residual	total
Household waste	111,187	179,830	291,017
Municipal waste	126,261	192,875	319,136
Figs in table Option 1	72,000	238,000	310,000
Figs in table Option 2	72,000	240,000	312,000
Figs in table Option 3	72,000	242,000	314,000

LA/Partnerships

Response Capacity **Response W7**

Dudley MBC	1150	The amount of municipal waste to be managed within each area should reflect the housing growth levels proposed within the Preferred Option.
LA/Partnerships		
South Worcestershire Authorities	1262	There is concern to ensure that the stated figures are correctly defined as this will impact upon subsequent modelling and delivery. The following comments represent the countywide position and are included after consultation with colleagues in WDA. 1) The narrative preceding the tables states that the tables show amount of HOUSEHOLD waste arising. However the tables state that the tables show MUNICIPAL. The classification of waste being modelled is critical, and will generate different figures as shown in the table provided. 2) Baseline figures for the year 2005/06 do not reflect actuals; the actual figures for Worcestershire are shown in the table provided.
LA/Partnerships		
Shrewsbury & Atcham Borough Council	1318	Response put forward by Shropshire County Council who are responsible for Waste Planning and Waste Development Frameworks.
LA/Partnerships		
CEPOG	1340	It should be possible for the WPAs to monitor performance against the targets as set out in the consultation document. The amount of municipal waste managed using different methods is already a core indicator within the Local Development Framework and the data is held by the waste disposal authorities. It should be possible for the WPAs to monitor performance against the targets, as the amounts of municipal waste managed using different methods is already a LDF Core Output Indicator. However, basing the proposed apportionments on the Housing options means that there is actually very little difference between the tonnages of waste
LA/Partnerships		

Response Capacity **Response W7**

Coventry City Council

1345 For Coventry these figures are acceptable.
The sub-region currently has 230K tonnes/annum capacity, principally at the Waste-to-Energy Plant at Whitley in Coventry. By 2010 assuming recycling rates of 50% there will be sub-regional need for 500K tonnes/annum capacity. The options to provide this additional capacity by waste-to-energy or equivalent are to:
- expand the existing facilities
- provide additional facilities in Warwickshire and / or Solihull
- allocate sites for waste management treatment to reduce the bulk of waste being incinerated or
- a mix of these.
However, whichever option or mix of options is decided upon but the 3 waste management authorities, the additional capacity required will not be available until well after 2010 due to the long lead-in times for such facilities to be planned and constructed. Interim arrangements will therefore need to be put in place largely resting on continuing use of landfill./ The RPP is urged to incorporate strong strategic policies within Revised RSS11 which supporting the need for this level of Municipal Waste Management provision to be made within the CSW sub-region. (Para 5.6.4)

LA/Partnerships

Stafford

116 No

Other - please specify

Environment Agency

1017 The tables set out clearly the diversion and residual targets for the plan periods. We are concerned however that the tables have used housing figures from 1995 as a base year. Since 1995 there have been many more houses built in the region and so this may be underestimating the expected waste for each authority.

The targets for diversion for all three housing options will be challenging , even if the local authorities can trade other authorities or borrow some allowance for next year's targets. All the options propose a growth in housing over current levels. To reduce the major increases in waste created by new development, waste management considerations must be included in the design, building and running of new homes. New development should be designed to incorporate facilities for recycling this is particularly important in high-density developments such as flats. Consideration should be given to where to locate and how to minimise the visual impact of civic amenity sites and maximise use in new development.
We consider that plans for new housing should be accompanied by equivalent plans to develop waste management infrastructure. If this is not done there is a risk that local authorities will not meet their targets and waste will have to be shipped to other local authorities or even other regions. A range of new waste management facilities need to be planned and timed to meet the needs of new residents.

Other - please specify

Response Capacity ***Response W7***

Mercia Waste Management C/O Axis

654 We consider that the RSS should plan for the maximum provision of facilities. It also appears from the evidence base provided within the emerging RSS that there is a critical shortage of certain waste management facilities.

Professional

SITA C/O Axis

663 We consider that the RSS should plan for the maximum provision of facilities. It also appears from the evidence base provided within the emerging RSS that there is a critical shortage of certain waste management facilities.

Professional

45 If adjacent WPA's have available space then these should be used rather than creating any new or expanding existing sites.

Resident

291 Local authorities are currently not doing enough to increase drastically recycling of waste this should be rectified now their future plans are also really inadequate especially if housing increases universal kerbside recycling (multi-products) are need now

Resident

472 Lichfield Council is at the forefront of separating household waste, in the country, learn from them.

Resident

**Response
Capacity** **Response W7**

546 Figures show that concentration on domestic waste with changing regime unnecessary.

Resident

752 Worcester - the sewerage works are at present probably working to capacity and for any further growth to the city would preferably be used only by the Westside and a new plant built to cope with the Eastside. Extra building will involve increased problems with surface water disposal and thought should be given in the future for collection of rainwater and grey water disposal in reed beds, with or without any extra houses being built.

Resident

911 We should pursue policies that actively encourage diversion from landfill and support the principle of 'the polluter pays' with an increase in charges for landfill. Greater emphasis should be put on recovery, reuse and reduce.

Resident

Brandwood West
Neighbourhood
Forum

966 Deep consultation on these issues should be carried out with the people that know more about this than me. These crews that collect the waste.

Resident

996 We should pursue policies that actively encourage diversion from landfill and support the principle of 'the polluter pays' with an increase in charges for landfill. Greater emphasis should be put on recovery, reuse and reduce.

Resident

*Response
Capacity* *Response W7*

1255 Optimistic! Get real, recycle commercial waste!

Resident

W08a comments

Response Capacity Response W8a comments

Rugby Branch of
the Coventry &
Warwickshire Ch
Com
Business

1160 Plans should include the expected growth/decline in the future

Health Planning
and Development
Agency

478 Tonnage cost.

Interest Group

West Midlands
Amenity
Societies
Association
Interest Group

569 We are not sufficiently qualified to comment

Campaign to
Protect Rural
England

642 CPRE (Staffordshire's preference would be for Criterion C - High to be adopted. This would be a challenging target but would most nearly match both the likely scale of the problem and also act as a spur to the technological innovation highly desirable in this field.

Interest Group

Campaign to
Protect Rural
England

923 We would like to see the diversion of waste from commercial sources reach the higher levels. The waste policy should also require local authorities to consider what tools they can use to ensure businesses minimise waste and maximise recycling and to ensure best practice across their own operations. While waste policy is increasingly putting the onus on individual householders to reduce their waste we are not convinced business is making sufficient

Interest Group

Response Capacity ***Response W8a comments***

Solihull
Metropolitan
Borough Council

358 The amount of land that the Council will need to allocate for waste management facilities or the amount of employment land that may be required for such facilities will be affected by the both employment land that may be required for such facilities will be affected but both principle of treatment of waste where it arises and the rate of diversion from landfill.

LA/Partnerships

Herefordshire
Council

418 In the long term opting for a high rate of diversion from landfill of the total percentage of commercial and industrial waste being land filled may have significant benefits. However, due to technical and funding issues a compromise would be to develop policies based on a medium diversion percentage of commercial and industrial waste from landfill. This would encourage the requirement of new initiative projects for this type of waste in dealing with the general predicted increase for commercial and industrial waste resulting from the requirement of greater diversion. This would lead onto the provision required for the high diversion, previously mentioned, to continue providing adequate provisions from the impacts of increased landfill tax and producer

LA/Partnerships

Worcestershire
County Council

479 It is considered that the level of diversion should not be set until the Revision to England's Waste Strategy is decided.

LA/Partnerships

Worcestershire
County Council

646 The WMRSS policy for commercial & industrial waste should be based on option b), medium (policies that reflect the levels of diversion in the draft Revisions to the England's Waste Strategy) as a minimum. Our Joint Municipal Waste Management Strategy (JMWMS) treats waste as a resource and as a point of principle we are keen to see policies that will encourage this, including the development of resource recovery parks. It is difficult to support option c, high, as such developments will be driven commercially and there is a need to ensure a level of provision that is consistent with the Governments revised England's Waste Strategy.

LA/Partnerships

Response Capacity ***Response W8a comments***

Rugby Borough Council

771 Plans should include the expected growth/decline in the future

LA/Partnerships

Staffordshire County Council

837 Staffordshire County Council's current waste strategy supports proposals that will reduce the overall amount of waste being land filled and no new waste disposal sites are supported in the Waste Local Plan. It is therefore considered that the WMRSS policy for Commercial and Industrial Waste should be based on c-high policies that reflects a higher rate of diversion of Commercial and Industrial Waste arisings from landfill. Given the quantities and range of commercial and industrial waste types, there is a need for the RSS to identify the need for new facilities that might be more appropriately planned for at a regional level including disposal facilities. This should take into account current facilities considered to be of regional significance.

LA/Partnerships

Clifton upon Dunsmore Parish Council

953 Plans should include the expected growth/decline in the future

LA/Partnerships

Gloucestershire County Council

1109 B may be the pragmatic option but c should not be discontinued. Regional planning bodies are changed with developing 'a realistic and responsible approach to future waste management'.

LA/Partnerships

Response Capacity ***Response*** ***W8a comments***

Redditch Borough Council 1142 The WMRSS policy for commercial & industrial waste should be based on option b), medium (policies that reflect the levels of diversion in the draft Revisions to the England's Waste Strategy) as a minimum. Our Joint Municipal Waste Management Strategy (JMWMS) treats waste as a resource and as a point of principle we are keen to see policies that will encourage this, including the development of resource recovery parks. It is difficult to support option c, high, as such developments will be driven commercially and there is a need to ensure a level of provision that is consistent with the Governments revised England's Waste Strategy.

LA/Partnerships

Solihull Metropolitan Borough Council 1146 The amount of land that the Council will need to allocate for waste management facilities, or the amount of employment land that may be required for such facilities will be affected by both the employment land that may be required for such facilities will be affected by both the principle of treatment of waste where it arises, and the rate of diversion from landfill.

LA/Partnerships

South Worcestershire Authorities 1262 the WMRSS policy for commercial and industrial waste should be based on option b) MEDIUM (policies that reflect the levels of diversion in the draft Revisions to the England's Waste Strategy) as a minimum. Our Joint Municipal Waste Management Strategy (JMWMS) treats waste as a resource and as a point of principle we are keen to see policies that will encourage this, including the development of resource recovery parks. It is difficult to support option c, HIGH, as such developments will be driven commercially and there is a need to ensure a level of provision that is consistent with the government's revised England's Waste Strategy.

LA/Partnerships

Shrewsbury & Atcham Borough Council 1318 Response put forward by Shropshire County Council who are responsible for Waste Planning and Waste Development Frameworks.

LA/Partnerships

Response Capacity ***Response W8a comments***

Rugby Borough Council

1319 Plans should include the expected growth/decline in the future.

LA/Partnerships

Coventry City Council

1345 There is an increasing demand to deal with and recycle this category of waste as close to the sources of creation as possible. There is a need to ensure that Revised RSS11 contains a policy encouraging the allocation of sufficient employment land to accommodate this specific need. Ref 5.6.7

LA/Partnerships

Government Office for the West Midlands

587 In the case of landfill, you have identified that there is both limited licensed Hazardous Waste Landfill capacity in the Region and that permitted landfill capacity for Municipal and for Commercial and Industrial waste is running out more quickly than anticipated. It is important that the RSS identifies whether these sites will be able to meet the capacity gap and if not, in which WPA the additional landfill should be located.

Other - please specify

Environment Agency

1017 we support the policy based on the highest diversion rate but we are concerned that there is no mechanism to regulate compliance across all sectors. The only drivers at the moment are the increasing cost of landfill and producer responsibility regulations. There are already targets for the reduction of waste from commercial and industrial sites. Unfortunately no one has ownership of these targets and the volume of waste produced has been relatively static since they were introduced.

Other - please specify

Response Capacity ***Response*** ***W8a comments***

Mercia Waste Management C/O Axis

654 There are two principal drivers for C&I landfill diversion which include:
 1. where existing practices become too expensive (i.e. landfill tax), or
 2. as a result of new legislation coming under the present regimes higher diversion cannot be guaranteed.

Professional

SITA C/O Axis

663 There is only one key driver for C&I landfill diversion which is landfill tax. Under the present tax regime higher diversion cannot be guaranteed.

Professional

291 much greater reduction of landfill needed

Resident

Brandwood West Neighbourhood Forum

966 Cannot answer

Resident

W08b comments

Response Capacity Response W8b comments

Waste Recycling Group Ltd 1339 C+1 waste is not subject to the same drivers as MSW. WRGs view is that it should be a WDA responsibility and be subject to LATS pressures. However for the time being, the most realistic approach is to assume that by various means the sector will comply with the governments targets.

Business

Health Planning and Development Agency 478 Tonnage cost.

Interest Group

West Midlands Amenity Societies Association Interest Group 569 We are not sufficiently qualified to comment

Pershore town council 583 keep under review

LA/Partnerships

Walsall Council 759 Any targets set in the RSS should aim to comply with national policy guidance. Although the targets proposed in the national waste strategy review consultation document are hardly ambitious, they are probably realistic, given the fact that WPAs have limited influence over the ways in which C & I

LA/Partnerships

Response Capacity ***Response W8b comments***

Dudley MBC 1150 Local authorities have little influence over the way in which commercial/industrial waste is managed. Nevertheless, at the very least plans should be based on the more demanding levels of diversion from landfill anticipated in the forthcoming National Waste Strategy. This is consistent with a strategy which increasingly regards waste as a resource to be reused.

LA/Partnerships

Shrewsbury & Atcham Borough Council 1318 Response put forward by Shropshire County Council who are responsible for Waste Planning and Waste Development Frameworks.

LA/Partnerships

CEPOG 1340 The preferred option for commercial and industrial waste diversion from landfill should be based on the medium option that would reflect the levels of diversion in the draft revisions to England's Waste Strategy. Any targets set in the RSS should aim to comply with nationally policy guidance. Although the targets proposed in the national waste strategy review consultation document are hardly ambitious, they are probably realistic, given the fact that WPAs have limited influence over the ways in which C & I

LA/Partnerships

Mercia Waste Management C/O Axis 654 There is no driving mechanism (see above)

Professional

SITA C/O Axis 663 There is no driving mechanism (see above)

Professional

Response ***Response W8b comments***
Capacity

291 industry and commerce need to take far more responsibility as do local authorities

Resident

W08c comments

Response Capacity Response W8c comments

Veolia es
Birmingham Ltd 364 More focus needs to be applied to diversion of C&I waste from landfill. Currently most government strategies and effort is expended on municipal waste diversion and treatment.

Business

National Farmers
Union 726 The RSS must reflect the position over the plan period.

Business

Birmingham
Chamber of
Commerce &
Industry 971 BCI believes that the option "c-high" should be adopted. This would ensure that Birmingham is prepared to recycle as much waste as possible over the lifespan of the revised WMRSS.

Business

Confederation of
West Midlands
Chamber of
Commerce 972 The Confederation believes that the option "c-high" should be adopted. This would ensure that the region is prepared to recycle as much waste as possible over this lifespan of the revised WMRSS. The current provision for disposing of industrial and commercial waste in rural areas is poor. We call upon the revised WMRSS to address this.

Business

Sustainable
Rugby C/O N
Sanderson 1000 High.

Business

Response Capacity ***Response W8c comments***

National Farmers Union, West Midlands Region

1155 The RSS must reflect the position over the plan period

Business

Rugby Branch of the Coventry & Warwickshire Ch Com Business

1160 Not until such time as technology allows for this level of diversion

Rugby Friends of the Earth

476 But more ambitious than shown in table below.

Interest Group

Health Planning and Development Agency

478 Tonnage cost.

Interest Group

Forestry Commission

511 Should move away from a status quo approach.

Interest Group

Response Capacity ***Response W8c comments***

West Midlands
Amenity
Societies
Association
Interest Group

569 We are not sufficiently qualified to comment

Hereford &
Worcester
Gardens Trust

965 This should reflect greater numbers of houses, employment and higher landfill tax.

Interest Group

Ludlow 21

1020 should be the target because an even higher rate of diversion will be required thereafter to avoid serious and irreversible environmental damage.

Interest Group

Regional
Environment
Partnership

1206 The RSS as a strategic plan should reflect the position over the plan period.

Interest Group

Rugby Borough
Council

771 Not until such time as technology allows for this level of diversion.

LA/Partnerships

Response Capacity ***Response W8c comments***

Clent Parish Council 783 need resource recovery park facilities

LA/Partnerships

Clifton upon Dunsmore Parish Council 953 Not until such time as technology allows for this level of diversion

LA/Partnerships

Telford & Wrekin Council 1018 We should seek to plan for the higher rates of diversion and recycling.

LA/Partnerships

Shrewsbury & Atcham Borough Council 1318 Response put forward by Shropshire County Council who are responsible for Waste Planning and Waste Development Frameworks.

LA/Partnerships

Rugby Borough Council 1319 Not until such time as technology allows for this level of diversion.

LA/Partnerships

Response Capacity ***Response W8c comments***

Stafford 116 Bear in mind the Waste Strategy will be revised shortly.

Other - please specify

Mercia Waste Management C/O Axis 654 It is premature to plan for further increases in landfill tax when this has not been confirmed.

Professional

SITA C/O Axis 663 It is premature to plan for further increases in landfill tax when this has not been confirmed.

Professional

1 The whole concept of hiding waste away in industrial estates so we can continue to pretend that our lifestyles aren't problematic is, again, modernist bunkrum. If our waste stinks, then force us to smell it. Maybe that will force society to solve its own problems rather than employing 'planners' to make sure we can continue stumbling blindly into an unsustainable future.

Resident

46 Every effort should be made to force the producers of waste to reduce the amount produced, using whatever means are necessary.

Resident

Response ***Response W8c comments***
Capacity

291 much reduced commercial use of landfill is essential and immediately

Resident

318 Consistent with ideals expressed in waste hierarchy

Resident

W09 comments

Response Capacity Response W9 comments

Veolia es
Birmingham Ltd

364 Assuming these existing sites are performing adequately and within the bounds of their permits, this is a key factor.

Business

Berkley Contract
Services Limited

705 BUT conditional on it being suitable to do this - there should be no blanket policy without safeguards to protect people in the event of any site not being suitable or appropriate to continued.

Business

National Farmers
Union

726 Quantities of hazardous waste may reduce as we move up the waste hierarchy and become more proficient at segregation etc. Therefore we may not need additional land provision, this needs to be examined carefully. Existing provisions should be maintained.

Business

Birmingham
Chamber of
Commerce &
Industry

971 The WMRSS should include a policy that requires Waste Development Frameworks to safeguard existing sites for the treatment and management of the city's Hazardous Waste.

Business

Confederation of
West Midlands
Chamber of
Commerce

972 The WMRSS should include a policy that requires Waste Development Frameworks to safeguard existing sites for the treatment and management of the region's Hazardous Waste.

Business

Response ***Response*** ***W9 comments***
Capacity

Sustainable
Rugby C/O N
Sanderson

1000 But Hazardous Waste sites should be strictly controlled with a long term objective of reduction.

Business

National Farmers
Union, West
Midlands Region

1155 Quantities of hazardous waste may reduce as we move up the waste hierarchy and become more proficient at segregation etc. Therefore we may not need additional land provision, this needs to be examined carefully. Existing provisions should be maintained.

Business

Rugby Branch of
the Coventry &
Warwickshire Ch
Com
Business

1160 this will not be feasible in all cases, and it may also be better to change the uses of some sites provided there is competing/better provision elsewhere.

Rugby Friends of
the Earth

476 Providing other sustainability criteria are met.

Interest Group

Health Planning
and Development
Agency

478 Where sites are suitable for expansion beyond current capacity to meet future need.

Interest Group

Response Capacity ***Response W9 comments***

Atherstone Civic Society

563 As long as these sites do not impact on public amenity or the appearance of the countryside

Interest Group

West Midlands Amenity Societies Association

569 While it is fascinating to learn that the Region is a net importer of such waste, there is little clue what it is - what is highly volatile liquid? The discussion provides a distinct impression that the treatment of hazardous waste is a national matter (e.g. the removal of turkeys from Suffolk to North Staffordshire for incineration). If it is necessary to have hazardous waste sites, it is considered that DEFRA and the Environment Agency are best placed to decide where they should be, given that they are the licensing authorities. It should not be the function of the WMRA to specify precise location of hazardous waste disposal, especially when there is no evidence that this matter has been considered in the context of adjacent Regions (including Wales).

Interest Group

Localise West Midlands

703 Yes, although aligned with RES policies to reduce the amount of hazardous waste being produced by industries in the region.

Interest Group

West Midlands Friends of the Earth

917 AS far as we are aware these are no identified Hazardous Waste Management sites within the Regions and as such w...are exporting our hazardous wastes to other Regions - notably the South West. Indeed , some of these hazardous waste are emerging from some of our waste treatment sites. We need more open and frank acknowledgement of our production ant treatment of these wastes so that the public can be better informed about how these wastes are being created and how best to manage those we cannot eliminate.

Interest Group

Response Capacity ***Response W9 comments***

Ludlow 21	1020	Yes so long as these sites continue to provide a valuable service to other Regions with whom we need to work in partnership.
Interest Group		
Localise West Midlands	1071	Yes, although aligned with RES policies to reduce the amount of hazardous waste being produced by industries in the region.
Interest Group		
Herefordshire Council	418	With regards to the current situation, as outlined in the contextual information on Hazardous Waste, it would be advisable to include in the WMRSS a policy requiring Waste Development Frameworks to safeguard existing sites for the treatment and management of Hazardous Waste.
LA/Partnerships		
Worcestershire County Council	479	There are very few sites and these should be safeguarded for future use.
LA/Partnerships		
Worcestershire County Council	646	This is essential given the reducing numbers of such sites nationally and the need to ensure continued provision for legitimate disposal. Additionally local councils must continue to be able to dispose of material they are obliged to collect because it is illegally dumped within their areas. The location of such facilities should particularly seek to minimise problems associated with illegal disposal/fly-tipping of waste from urban areas in surrounding rural areas.
LA/Partnerships		

Response Capacity ***Response W9 comments***

Kenilworth Town Council

685 It is very important that hazardous waste sites are protected both for future use and for safety.

LA/Partnerships

Walsall Council

759 Where they are well-located and do not give rise to environmental or amenity problems. We agree with the general principle that wherever possible, it is better to consolidate and expand existing, well located sites for the treatment of hazardous waste than to develop new ones on new sites. Where there is scope for existing facilities to be expanded, this should be encouraged in principle subject to appropriate safeguards. However, not all sites are well located so the RSS should also support the relocation of poorly located facilities to sites that have better accessibility and/or less impact on amenity environment.

LA/Partnerships

Rugby Borough Council

771 This will not be feasible in all cases, and it may also be better to change the uses of some sites provided there is competing/better provision elsewhere.

LA/Partnerships

Clent Parish Council

783 specialised centres required

LA/Partnerships

Clifton upon Dunsmore Parish Council

953 This will not be feasible in all cases, and it may also be better to change the uses of some sites provided there is competing/better provision elsewhere

LA/Partnerships

Response Capacity ***Response W9 comments***

Telford & Wrekin Council

1018 See W1.

LA/Partnerships

Gloucestershire County Council

1109 Yes, providing the existing capacity has been subject to SSA.

LA/Partnerships

Redditch Borough Council

1142 Yes this is essential given the reducing numbers of such sites nationally and the need to ensure continued provision for legitimate disposal. Additionally local councils must continue to be able to dispose of material they are obliged to collect because it is illegally dumped within their areas. The location of such facilities should particularly seek to minimise problems associated with illegal disposal/fly-tipping of waste from urban areas in surrounding rural areas.

LA/Partnerships

Dudley MBC

1150 Allocating land in a Waste DPD specifically for waste management purposes could be problematic given use of class issues - should a certain waste management facility be considered as B2, the facility could be replaced with a general industrial (B2) land use without the WPA becoming aware.

LA/Partnerships

South Worcestershire Authorities

1262 This is essential given the reducing numbers of such sites nationally and the need to ensure continued provision for legitimate disposal. Additionally local councils must continue to be able to dispose of material they are obliged to collect because it is illegally dumped within their areas. The location of such facilities should particularly seek to minimise problems associated with illegal disposal/fly tipping of waste from urban areas in surrounding rural areas.

LA/Partnerships

Response Capacity Response W9 comments

Shrewsbury & Atcham Borough Council

1318 Response put forward by Shropshire County Council who are responsible for Waste Planning and Waste Development Frameworks.

LA/Partnerships

Rugby Borough Council

1319 This will not be feasible in all cases, and it may also be better to change the uses of some sites provided there is competing/better provision elsewhere.

LA/Partnerships

CEPOG

1340 As a general approach, it is considered appropriate that wherever possible, it is better to consolidate and expand existing well located sites for the treatment of hazardous waste, than to develop new ones on new sites.
 However, as not all sites are well located, there is support for the relocation of poorly located facilities to sites that have better accessibility and/or less impact on amenity or the environment.
 We agree with the general principle that wherever possible, it is better to consolidate and expand existing, well-located sites for the treatment of hazardous waste, than to develop new ones.
 However, not all sites are well-located, so the RSS should also support the relocation of poorly-located facilities.

LA/Partnerships

Coventry City Council

1345 There is a lack of knowledge regarding hazardous waste so it is difficult to give an informed answer. There is a need to safeguard existing sites and identify future sites. All existing sites are landfill and asbestos requires separate treatment cells.
 Overriding the specific categories of waste is the need to ensure specific provision within each sub-region of a site for dealing with hazardous waste. Linked to that is the recommendation that a series of 'Waste Management Parks' are required by Revised RSS11 and allocated within sub-regional Waste Management Strategies and LDFs.
 Such sites will provide for the opportunity to deal with waste in a more integrated manner with the benefits of high quality environmental protection, integrated access arrangements and the opportunity for specialist and high technology employment. (para 5.6.8).

LA/Partnerships

Response **Response** **W9 comments**
Capacity

Government
Office for the
West Midlands

587 We would anticipate that facilities for the management of hazardous waste and landfill would serve more than one WPA area. In the case of hazardous waste, we recognise there are issues arising from the change in definition of Hazardous Waste and the current level of uncertainty around whether additional facilities are required. Based on current information, the existing facilities for the treatment of hazardous waste located in the Black Country and Coventry are sufficient to meet the Region's needs but also suggests that these facilities could be expanded or a further facility could be constructed if a third layer wanted to enter the market.

Other - please
specify

Environment
Agency

1017 The West Midlands is very well served with good treatment and recovery facilities. Indeed the West Midlands region is a net importer of hazardous waste. If a treatment plant was lost within the West Midlands region it could have national implications. All the housing options in the RSS involve a significant increase in new development. A proportion of development will be on brownfield land and some sites will be contaminated. Even if the contaminated soil is as far as possible treated insitu there will still be residual contaminated soil that will need to be disposed off in a hazardous waste site. At the moment there is no way of assessing the scale of this issue and whether there is sufficient capacity to manage this waste in the region. As a minimum the region needs to safeguard hazardous waste to provide capacity to meet any future demand. There also needs to be support for the appropriate use of insitu land remediation techniques or centralised soil treatment plants of the type commonly used.

Other - please
specify

1299 Where waste facility sites are located ...to residential/employment areas there should be provision for relocation e.g. on the ... Site in Stoke on Trent.

Other - please
specify

Mercia Waste
Management C/O
Axis

654 The number of hazardous waste sites, particularly very close to the Major Urban Areas, is very limited. As a consequence, they should be safeguarded.

Professional

Response Capacity ***Response W9 comments***

SITA C/O Axis 663 The number of hazardous waste sites, particularly very close to the Major Urban Areas, is very limited. As a consequence, they should be safeguarded.

Professional

Home Builders Federation 1086 It is imperative that existing. Proposed hazardous Waste sites are clearly identified on Proposals maps. Such sites may prevent housing or other developments from coming forward.

Professional

George Wimpey
c/o Gough
Planning Services 1294 Where waste facility sites are located ...to residential/employment areas there should be provision for relocation e.g. on the ... Site in Stoke on Trent.

Professional

1 If there are no holes to bury hazardous waste in, then maybe we'd be forced to not use hazardous materials in the continuation of our unsustainable lifestyles? Thought if that one, planners?

Resident

472 Landfill tax encourages fly tipping of dangerous product. Again criteria is always based on money, not the health of our planet

Resident

Response Capacity ***Response W9 comments***

807 Unsure

Resident

911 Yes, but Hazardous Waste sites should be strictly controlled with a long term objective of reduction.

Resident

Brandwood West
Neighbourhood
Forum

966 But this has to be absolutely safe. This should include the transporting of this waste through public areas, roads, villages etc

Resident

996 Yes, but Hazardous Waste sites should be strictly controlled with a long term objective of reduction.

Resident

W10 comments

Response Capacity Response W10 comments

The Tipton &
Coseley Building
Society

393 Concentrate on the existing sites.

Business

Sustainable
Rugby C/O N
Sanderson

1000 This will be in line with the proximity principle of waste disposal. Emerging technologies should allow this to happen, and will discourage shipment to other areas.

Business

The Federation of
Small
Businesses West
Midlands
Business

1105 There are not enough Hazardous Waste sites (nearest one is Risely, Manchester) and this has led to huge increases in prices as well as transportation costs.

Rugby Branch of
the Coventry &
Warwickshire Ch
Com
Business

1160 Emerging technologies will allow for less obtrusive facilities and therefore sites may become more identifiable

Rugby Friends of
the Earth

476 Because there is not an increasing need on the basis of the evidence.

Interest Group

Response Capacity ***Response W10 comments***

Health Planning and Development Agency

478 Also policy to develop all waste re-use.

Interest Group

West Midlands Friends of the Earth

917 If we are, as a Region, generating such hazardous by-products then we should, first of all, be seeking ways to stop the production of these "wastes". If that is either no possible or feasible, then we would deal with these by-products as close to their place of production as possible using the proximity and polluter-pays principles. This again will require wider public dialogue because, if these products turn out to be needed to support our current collective needs and demands then we have to change those needs and demands or deal effectively with the consequences of our behaviour.

Interest Group

Campaign to Protect Rural England

923 If those sites become needed to deal with hazardous waste from the MUAs. We do not believe the region should be importing any additional hazardous waste, which we would expect to be dealt with where it arises.

Interest Group

Herefordshire Council

418 Acknowledging current circumstances, giving specific priority on identifying new sites for facilities to store, treat and remediate Hazardous Waste may not be necessary. This is because there is estimated to be adequate existing provision, based on current information, although exact amounts are not known. However, a degree of flexibility is advised here to accommodate any changes in this situation over a given period of time, following more detailed monitoring. With regards to contaminated soils and demolition waste, the continued practice of dealing with it "in situ" to avoid unnecessary, possibly unsustainable movement of hazardous Wastes and promote the proximity principle in dealing with it, would be advantageous.

LA/Partnerships

Response Capacity ***Response W10 comments***

Worcestershire
County Council

479 The MUAs are the major producers of hazardous wastes and sites should be identified.

LA/Partnerships

Bromyard &
Winslow Town
Council

644 Subject to need and a phased timetable.

LA/Partnerships

Worcestershire
County Council

646 For the reasons stated in response to Q9 and to minimise risks of increasing illegal disposal in the surrounding rural areas.

LA/Partnerships

Kenilworth Town
Council

685 Although there may need of co-operation and cross-authority working.

LA/Partnerships

Walsall Council

759 There is no evidence of any pressing need for new sites for the management and treatment of hazardous waste within the MUAs. Most of the hazardous waste management and treatment facilities that currently exist within the region are within the MUAs.

LA/Partnerships

Response Capacity ***Response W10 comments***

Rugby Borough Council

771 Emerging technologies will allow for less obtrusive facilities and therefore sites may become more identifiable.

LA/Partnerships

Clent Parish Council

783 policy required to ensure they are on brownfield sites only to avoid contamination of green belt land

LA/Partnerships

Clifton upon Dunsmore Parish Council

953 Emerging technologies will allow for less obtrusive facilities and therefore sites may become more identifiable

LA/Partnerships

Telford & Wrekin Council

1018 The proximity principle means that more effort needs to be made in the MUA's to manage their own waste as much as possible. The issue of contaminated soil will become more important if the higher rates of housing growth and the amount that will need to be accommodated on previously developed land in the MAUs are realised.

LA/Partnerships

Gloucestershire County Council

1109 Yes

LA/Partnerships

Response Capacity ***Response W10 comments***

Redditch Borough Council 1142 Yes, for the reasons stated in response to Question W9 and to minimise risks of increasing illegal disposal in the surrounding rural areas.

LA/Partnerships

Dudley MBC 1150 There is at this stage insufficient evidence to assess the need for additional facilities for this waste stream.

LA/Partnerships

South Worcestershire Authorities 1262 For the reasons stated in response to W9 and to minimise risks of increasing illegal disposal in the surrounding rural areas.

LA/Partnerships

Shrewsbury & Atcham Borough Council 1318 Response put forward by Shropshire County Council who are responsible for Waste Planning and Waste Development Frameworks.

LA/Partnerships

Rugby Borough Council 1319 Emerging technologies will allow for less obtrusive facilities and therefore sites may become more identifiable.

LA/Partnerships

Response ***Response*** ***W10 comments***
Capacity

CEPOG 1340 There is no evidence of any pressing need for new sites beyond those already identified in statutory Development Plan documents for the management and treatment of hazardous waste within the MUAs. Most of the hazardous waste management and treatment facilities that currently exist within the region are within the MUAs.
Locations for treating and storing higher risk waste should be the responsibility of policies at the national level.

LA/Partnerships

Coventry City Council 1345 If the facilities are for a valid treatment and the facilities meet specific criteria.

LA/Partnerships

Environment Agency 1017 We consider that hazardous waste sites should be allocated to meet current or identified future demand. These facilities can be shared between local authorities and between regions so it is likely that not all major urban areas will need a full range of facilities. Again other ways of reducing the quantities of contaminated waste should be part assessment of required capacity for the region. Sites should allocated if an assessment shows a shortfall in capacity that can not be met by situ treatment or centralised hub for soil treatment or by transferring to a hazardous waste site in a neighbouring region.

Other - please specify

Mercia Waste Management C/O Axis 654 It is not practical to assume that competing land uses and limited available land in the Major Urban Areas will permit for hazardous waste disposal/treatment facilities.

Professional

***Response
Capacity*** ***Response W10 comments***

SITA C/O Axis 663 It is not practical to assume that competing land uses and limited available land in the Major Urban Areas will permit for hazardous waste disposal/treatment facilities.

Professional

Home Builders Federation 1086 The need for such sites must be balanced against the need for the MUAs to accommodate the majority of the housing that the RSS is currently proposing.

Professional

46 If no such facilities are present, or adequate for future needs, then provision needs to be given to reduce the amount of waste which is buried and increase the amount which is processed.

Resident

730 Further waste may be reclassified as hazardous in future

Resident

911 This will be in line with the proximity principle of waste disposal. Emerging technologies should allow this to happen, and will discourage shipment to other areas.

Resident

Response Capacity ***Response W10 comments***

Brandwood West
Neighbourhood
Forum

966 Yes as above

Resident

996 This will be in line with the proximity principle of waste disposal. Emerging technologies should allow this to happen, and will discourage shipment to other areas.

Resident

W11 comments

Response Capacity Response W11 comments

Sustainable Rugby C/O N Sanderson 1000 Yes, but not in the vicinity of residential development of sites of natural or scientific interest, and preferably at locations that are unlikely to be considered for development.

Business

The Federation of Small Businesses West Midlands 1105 We would like to see more ready-prepared sites for the use of business. At present it is up to the business to identify a possible site and prepare it for waste disposal, such as clay-ling. We feel this should be done by the Region, rather than by the business, to ensure consistent and high standards for

Business

Rugby Branch of the Coventry & Warwickshire Ch Com Business 1160 There should be a suitable disposal route for Hazardous Waste. Travelling long distances may prove more harmful in the long run and thus be unsustainable.

Health Planning and Development Agency 478 As in W10.

Interest Group

Atherstone Civic Society 563 Depends on the location. Must be away from dwellings and not have a detrimental impact on the countryside

Interest Group

Response ***Response*** ***WII comments***
Capacity

West Midlands
Friends of the
Earth

917 This again needs the public to understand why we are producing these products in the first place and how as a community we should deal with the consequences of our behaviour. Greater awareness-raising is needed if we are to take responsibility for the creation of these products and their consequent disposal. Full openness and transparency about the mode of these operations should lead to far greater public understanding of what is going on and why.

Interest Group

Campaign to
Protect Rural
England

923 Only to deal with locally generated hazardous waste and subject to a full environmental assessment.

Interest Group

Ludlow 21

1020 There should be a general principle guarding against the proliferation of sites for the disposal of hazardous waste which will increase the danger of contamination by these wastes for future generations. Where possible these wastes should be concentrated in existing sites which can be very clearly

Interest Group

Herefordshire
Council

418 Similarly to W10, WMRSS policy for Waste Development Frameworks need to specify for non MUAs new sites for disposal of hazardous waste. However, a degree of flexibility is advised given the limited information on the effects of the new categorisation of Hazardous Waste, in case the situation alters and extra provision in these non MUAs is required at a later date, based on further monitoring outcomes. The creation of protective cells in Landfill sites for stable Hazardous Waste maybe a good way of dealing with hazardous waste arising in accordance with the proximity principle, where facilities allow and where a need has been identified.

LA/Partnerships

Response Capacity ***Response WII comments***

Worcestershire County Council 479 Very little hazardous waste is produced in non-MUAs and it would not be appropriate to manage this waste stream on this basis, particularly due to economics of scale.

LA/Partnerships

Tamworth Borough Council 547 only if there is evidence to support the need

LA/Partnerships

Worcestershire County Council 646 Where this may be necessary to meet local need and is not accommodated in accordance with comments in response to Q9 & 10.

LA/Partnerships

Kenilworth Town Council 685 Again, there may be need for co-operation and cross-authority working, including the need for inter-regional working.

LA/Partnerships

Walsall Council 759 At least not in areas that are close to where people live or where it is likely to cause environmental problems. If there is considered to be a pressing need for such a facility within the region, it will only be provided if the RSS identifies a broad location for it, which will then commit a particular WPA or group of WPAs to bring it forward. Such a proposal is likely to be highly controversial, politically unpopular and no authority is likely to volunteer to provide it. We do not feel that the RSS should support the provision of hazardous waste disposal facilities anywhere in the region that are close to where people live, or that are likely to cause environmental problems, particularly with regard to impact on water supply and biodiversity.

LA/Partnerships

Response Capacity ***Response WII comments***

Rugby Borough Council

771 There should be a suitable disposal route for hazardous Waste. Travelling long distances may prove more harmful in the long run and thus be unsustainable.

LA/Partnerships

Clent Parish Council

783 Because of the amount generated particularly on new development sites

LA/Partnerships

Staffordshire County Council

837 If disposal of hazardous waste to landfill is appropriate, such facilities should be identified at the Regional level and appropriately safeguarded from other development. Sites will need to be capable of meeting a range of locally based environmental and amenity criteria and prolonged restoration timescales will need to be taken into consideration.

LA/Partnerships

Clifton upon Dunsmore Parish Council

953 There should be a suitable disposal route for Hazardous Waste. Travelling long distances may prove more harmful in the long run and thus be unsustainable.

LA/Partnerships

Telford & Wrekin Council

1018 Yes, subject to environmental acceptance and bearing in mind the need to maximise housing growth on PDL within the MUAs.

LA/Partnerships

Response Capacity ***Response W11 comments***

Inland Waterways Association (Birmingham) 1085 Not if the present ones, and those identified in W10, can cope.

LA/Partnerships

Gloucestershire County Council 1109 Yes, if necessary.

LA/Partnerships

Redditch Borough Council 1142 Yes, where this may be necessary to meet local need and is not accommodated in accordance with comments in response to Questions W9 & W10.

LA/Partnerships

Dudley MBC 1150 A large proportion of the residues (themselves considered hazardous) go to landfill and there is "very limited licensed hazardous waste landfill capacity in the Region". The reinstatement of contaminated sites prior to development within the MUAs (in pursuit of urban renaissance) gives rise to hazardous wastes such as contaminated soil that may need to be land filled.

LA/Partnerships

South Worcestershire Authorities 1262 Where this may be necessary to meet local need and is not accommodated in accordance with comments in response to W9 & W 10.

LA/Partnerships

Response Capacity ***Response WII comments***

<p>Shrewsbury & Atcham Borough Council</p> <p>LA/Partnerships</p>	<p>1318</p>	<p>Response put forward by Shropshire County Council who are responsible for Waste Planning and Waste Development Frameworks.</p>
<p>Rugby Borough Council</p> <p>LA/Partnerships</p>	<p>1319</p>	<p>There should be a suitable disposal route for Hazardous Waste. Travelling long distances may prove more harmful in the long run and thus be unsustainable.</p>
<p>CEPOG</p> <p>LA/Partnerships</p>	<p>1340</p>	<p>Locations for treating and storing higher risk waste should be the responsibility of policies at a national level. At least not in areas that are close to where people live or where it is likely to cause environmental problems. The question is phrased as though it does not apply to unitary authorities! We do not feel that the RSS should support the provision of hazardous waste disposal facilities anywhere in the region that are close to where people live, or that are likely to cause environmental problems, particularly with regard to impact on water supply and biodiversity. If the RSS seeks to support the provision of hazardous waste disposal facilities within the region, this should be subject to strict criteria relating to environmental impact.</p>
<p>Stafford</p>	<p>116</p>	<p>As and when necessary.</p>
<p>Other - please specify</p> <p>Environment Agency</p>	<p>1017</p>	<p>a good understanding of waste management issues is needed so that new facilities can be appropriately planned and built in the best locations. New development could increase the quantities of contaminated soil resulting in a need for new facilities.</p>
<p>Other - please specify</p>		

Response Capacity ***Response*** ***WII comments***

Mercia Waste Management C/O Axis

654 Given the position regarding the availability of suitable land within the Major Urban Areas (MUAS), particularly given the number of competing land uses within these areas, it is appropriate to consider hazardous waste facilities outwith the MUAS, including the creation of protective cells within existing landfills.

Professional

SITA C/O Axis

663 Given the position regarding the availability of suitable land within the Major Urban Areas (MUAs), particularly given the number of competing land uses within these areas, it is entirely appropriate to consider hazardous waste facilities outwith the MUAs, including the creation of protective cells within existing

Professional

Home Builders Federation

1086 The HBF is concerned that identifying hazardous waste sites will compromise an area's ability to meet housing demands and needs. Utilising existing landfills may be a way forward, as suggested.

Professional

1 Change the regulation of the production of hazardous materials rather than worry about what to do with it. Aren't you looking at things through the wrong end of the telescope?

Resident

46 Why do MUAs and the non-MUAs have to work in isolation? Can they not work together and share facilities.

Resident

***Response
Capacity*** ***Response W11 comments***

517 Minimise the transport.

Resident

546 Should be concentrated in MUA

Resident

911 Yes, but not in the vicinity of residential development or sites of natural or scientific interest, and preferably at locations that are unlikely to be considered for development.

Resident

Brandwood West
Neighbourhood
Forum

966 Do not know enough to answer

Resident

W12 comments

Response Capacity Response W12 comments

National Farmers Union 726 The beneficial re-use and recycling of construction and demolition waste is a sensible approach and must be supported in the RSS.

Business

Sustainable Rugby C/O N Sanderson 1000 Definitely

Business

The Federation of Small Businesses West Midlands 1105 'on site' recycling is possible, but only when sufficient space is available. This was done with the Cape Hill Brewery demolition, where storage of the various grades of crushed brick and other materials was possible. Would prefer to see encouragement for this activity, rather than compulsion, to retain flexibility. It should be noted that recycling centres are still required, because not all sites have the option to recycle 'on-site'
b) Old quarries surely are ideal for this.

Business

Rugby Friends of the Earth 476 Emphasising that both are needed for varying circumstances.

Interest Group

Response Capacity ***Response W12 comments***

Health Planning
and Development
Agency

478 A. Landscaping - roads, etc. should use all where inert waste exists. B. Nothing new - Romans/Greeks/Egyptians for thousand years plus!

Interest Group

Warwickshire
Rural Community
Council

508 Where the Regional Spatial Strategy can make a difference is in encouraging reuses and recycling. We would support the maximisation of "on-site" recycling and the promotion of "urban quarries" where materials can be recycled to a high standard.

Interest Group

Forestry
Commission

511 We support the greater recycling of construction and demolition waste, particularly wood based waste, an objective under the Regional Forestry Framework (Recycling theme). Opportunities to recycle (clean) waste wood for energy (e.g. wood pellets) should be encouraged (G).

Interest Group

West Midlands
Amenity
Societies
Association

569 The discussion on construction and demolition waste provides some description of the processes involved. However the suggestion that recycling of demolition waste can take place on the demolition site avoids the need to consider removal of, say, asbestos, timber, and other non-aggregate waste. It is highly unlikely that urban quarries will provide a complete solution. While the reduction of the transport of waste is a sound aim, the option posed at W12, particularly at a), may not be realistic in strategic centre locations. In these locations small sites will probably present economic recycling. The solution is more likely to be W12b) where transfer stations on industrial land will provide the solution.

Interest Group

Response Capacity ***Response W12 comments***

Hampton-in-Arden Society 610 While the reduction of the transport of waste is a sound aim, the option posed at W12, particularly at a), may not be realistic in strategic centre locations. In these locations small sites will probably prevent economic recycling. The solution is more likely to be W12b) where transfer stations on industrial land will provide the solution.

Interest Group

Council for British Archaeology West Midlands 702 The appropriate reuse and conversion of existing building stock, including historic buildings, rather than demolition and new build would reduce the amount of construction waste and contribute to sustainable development.

Interest Group

Monics Walk Group 871 Greatest producers of waste. Reduce need for quarrying in green belt, greenfield, woodland sites.

Interest Group

West Midlands Friends of the Earth 917 The first question should be whether demolition is required. Once that has been established, then as much materials and resources should be reused within the building as possible. After that as much on-site recycling should take place as possible, using mobile machinery. Finally offsite export for reuse on another site should be considered. The design of new build should always attempt to incorporate as much of the existing structure as is possible. Any artifacts that can be used off-site should be offered to local traders. Efforts should be made to allow building to be dismantled so that less waste is produced at the end of their life.

Interest Group

***Response
Capacity*** ***Response W12 comments***

Campaign to Protect Rural England 923 Both approaches should be adopted, but we would like to see (a) prioritised. It should also include maximising the reuse of material such as brick, slate and wood rather than crushing them.

Interest Group

Ludlow 21 1020 to the maximum possible

Interest Group

Transport 2000 West Midlands 1292 With regard to construction and demolition, "on-site" recycling should be encouraged wherever possible as this will minimise transport impacts. If urban quarries are provided though they need to be accessible by road, rail and canal. The lifetime of the RSS will include some hefty increases in the landfill tax. This should impel waste disposers and authorities to look beyond landfill and towards alternatives such as incineration. If incineration is considered by a group of waste authorities it may be appropriate for "bin-liner" trains to be used to transport the waste for incineration in order to minimise the environmental impacts and achieve economies of scale.

Interest Group

Transport 2000 West Midlands 1312 With regard to construction and demolition, "on-site" recycling should be encouraged wherever possible as this will minimise transport impacts. If urban quarries are provided though they need to be accessible by road, rail and canal. The lifetime of the RSS will include some hefty increases in the landfill tax. This should impel waste disposers and authorities to look beyond landfill and towards alternatives such as incineration. If incineration is considered by a group of waste authorities it may be appropriate for "bin-liner" trains to be used to transport the waste for incineration in order to minimise the environmental impacts and achieve economies of scale.

Interest Group

Response ***Response*** ***W12 comments***
Capacity

Peak District
National Park
Authority

332 Both these routes to recycling should be promoted. This may have the beneficial effect of reducing demand for new materials extracted from the Peak District National Park and will be consistent with policy in the East Midlands RSS to reduce extraction within the National Park.

LA/Partnerships

Herefordshire
Council

418 The WMRSS should encourage greater recycling of construction and demolition waste through maximising "on-site" recycling and perhaps "urban quarries" could be promoted in the MUAs dependant on where the "variety of sites" are located giving appropriate awareness to the proximity principle.

LA/Partnerships

Worcestershire
County Council

479 Support both approaches.

LA/Partnerships

Pershore town
council

583 A and B both have a place.

LA/Partnerships

Worcestershire
County Council

646 The WMRSS should expressly support this given the wider benefits to be gained in terms of climate change.

LA/Partnerships

Response Capacity ***Response W12 comments***

Walsall Council 759 We agree that the RSS should support greater recycling of C & D waste in principle. Research by WRAP suggests that increased amounts of recyclable C & D waste are now entering the market in the West Midlands Metropolitan area and that the market is likely to grow and diversify in the future. Although recycling is acknowledged to be a more sustainable method of managing C & D waste, one unfortunate consequence of this is that there is now less inert waste available for the restoration of former mineral workings. If other materials are not permitted to be used as fill, restoration could take much longer to

LA/Partnerships

Wyre Forest District Council 762 Broadly support this policy initiative subject to the location of "urban quarries" being sensitively located.

LA/Partnerships

Staffordshire County Council 837 Policies should encourage on-site re-use rather than on-site disposal so that potential aggregate materials are used again in construction. Reference should be made to policy M3 of the RSS. Taking into account the hierarchical approach to minerals supply (refer to the introduction in MPS1) reference should be made to more efficient use of materials by reducing the amount of material used on construction. Another factor is that use of alternative aggregate may be more sustainable where local sources of primary aggregate are not available.

LA/Partnerships

Sustainability West Midlands 925 Yes to both questions

LA/Partnerships

Response Capacity Response W12 comments

Telford & Wrekin Council

1018 Subject to environmental acceptance and bearing in mind the need to maximise housing growth on PDL within the MUA's.

LA/Partnerships

Inland Waterways Association (Birmingham)

1085 It should be recycled on site where possible and thus minimise the movement of the waste on the highway.

LA/Partnerships

Gloucestershire County Council

1109 Yes, provided that the amenity of urban communities is protected.

LA/Partnerships

Stratford-on-Avon District Council

1121 Our Local Plan supports this approach through a policy (policy PR.5) expecting all development to minimise the depletion of irreplaceable resources, with a particular focus on management of demolition and construction waster materials.

LA/Partnerships

Redditch Borough Council

1142 Yes, the WMRSS should expressly support this given the wider benefits to be gained in terms of climate change

LA/Partnerships

Response Capacity ***Response W12 comments***

Dudley MBC 1150 Re-use and recycling of C & D is further sustainable in that it reduces dependence on primary aggregates extracted from the ground. This is a very significant waste stream for the Black Country in view of the scale of redevelopment of brownfield land that is required to deliver the regeneration strategy. Dudley strongly supports in-situ recycling on larger sites and the "urban quarry" concept which will assist with the implementation of the regeneration

LA/Partnerships

South Worcestershire Authorities 1262 the WMRSS should expressly support this given the wider benefits to be gained in terms of climate change

LA/Partnerships

Belbroughton Parish Council 1287 At the same time we recognise that recycling is important. Therefore we fully support, inter alias, recycling of construction waste on site as far as possible and the concept of "urban quarries".

LA/Partnerships

Shrewsbury & Atcham Borough Council 1318 Response put forward by Shropshire County Council who are responsible for Waste Planning and Waste Development Frameworks.

LA/Partnerships

Response Capacity **Response W12 comments**

CEPOG 1340 It is appropriate that the Phase Two Revision should support this in principle. However, information on construction and demolition waste is still deficient and, without better data, it will be difficult to predict and plan for future needs.
We agree that the RSS should support greater recycling of C & D waste in principle. Recent research by WRAP suggests that the market is likely to grow and diversify in the future, but without better data it will be difficult to predict and plan for future needs.

LA/Partnerships

Coventry City Council 1345 a) Yes
b) There would not be sufficient land for urban quarry in Coventry but there could be for sites for recycling e.g. MRFs on employment sites. Efforts should be made to promote aggregate re-use.
In order to reduce the need for primary aggregates over the plan period the CSW sub-region intends to facilitate the increased use of secondary and recycled materials. This will require that:
- the sub-regional waste authorities identify within their Joint Waste Strategy and LDFs appropriate sites that are near the sources of waste and the end users
- development schemes maximise the use of construction materials that reduce the demand for primary aggregates where practical
- existing railheads and handling areas used for recycled and primary aggregates are retained and safeguarded.

LA/Partnerships

Government Office for the West Midlands 587 From April 2008, it will be a legal requirement for any construction project over £250,000 in value to have a Site Waste Management Plan (SWMP). In view of this, it appears unnecessary to include this requirement in the RSS.

Other - please specify

Natural England West Midlands 842 Supports the approach that the Spatial Options should encourage greater recycling of construction and demolition waste.

Other - please specify

Response Capacity ***Response W12 comments***

Environment Agency 1017 we very much support a policy that encourages the reduction of construction and demolition waste in the West Midlands. This sector contributes one third of all waste produced in the region. Although the current practice it that a large proportion of construction and demolition waste is recycled on site, especially aggregate, there is still room for further improvement in overall recycling rates . We consider the policy should encourage on site recycling by requiring developers to produce a Site Waste Management Plan for their new developments.
Reducing the waste produced on site and requiring companies to plan for its disposal/recovery could also help reduce the high levels of fly tipping of construction and demolition waste.
We fully support the concept of setting up centres for collection and reuse of building material, however the term 'urban quarry' requires further clarification and inclusion in the jargon buster.

Other - please specify

English Heritage 1141 As highlighted by the Sustainability Appraisal waste minimisation should also feature. The policy response should include promoting the reuse of the historic built stock wherever a choice exists.

Other - please specify

Mercia Waste Management C/O Axis 654 We agree that the RSS should encourage greater recycling of construction and demolition wastes but have concerns regarding point b). As set out above regarding Hazardous Waste, the availability of suitable sites and land within the MUAs for waste management facilities is limited (as a result of higher land costs and incompatibility with neighbouring developments) and it would not always be possible to provide "urban quarries" within these areas.

Professional

SITA C/O Axis 663 Yes we agree that the RSS should encourage greater recycling of construction and demolition wastes but have concerns regarding point b). As set out above regarding Hazardous Waste, the availability of suitable sites and land within the MUAs for waste management facilities is limited and it would not always be possible to provide 'urban quarries' within these areas.

Professional

Response Capacity ***Response W12 comments***

Lafarge
Aggregates Ltd.
c/o Chartered
Surveyors

886 It is considered that the WMRSS should encourage the greater recycling of C & D waste through the provision of suitable sites. Such sites could be fully integrated, whereby the recycled material can immediately employed in the manufacture of added value products such as ready mixed concrete or certain asphalts.

Professional

National Housing
Federation (West
Midlands)

1084 Housing Associations aim for very high standards in the use of material in construction, and we wish to see maximum practicable recycling. Further improvement can be achieved by the greater use of factory-made construction elements, which are produced efficiently in controlled environments and assembled with minimum wastage on construction sites: we would like to see the RSS encourage this.

Professional

Home Builders
Federation

1086 Whilst on site recycling is already undertaken, means of achieving higher standards would be welcomed from the Assembly.

Professional

1 Yes, there should be far more recycling of construction and demolition waste through on site recycling, and yes, urban quarries are a sensible idea.

Resident

46 What a strange question! I would be interested to know why anyone would say 'no'.

Resident

***Response
Capacity*** ***Response W12 comments***

472 Only common sense

Resident

517 a) is preferable.

Resident

730 Some mandatory requirements may be necessary to achieve the objective

Resident

911 Yes, definitely.

Resident

Brandwood West
Neighbourhood
Forum

966 Absolutely - if this is not detrimental to land and people

Resident

***Response
Capacity*** ***Response W12 comments***

996 Definitely.

Resident

1132 Using both strategies where appropriate.

Resident

W13 comments

Response Capacity Response W13 comments

Berkley Contract
Services Limited

705 The wording is confusing but I think the nub was to promote the use of brownfield sites, with which I am very much in favour.

Business

National Farmers
Union

726 Each planning application should be examined according to its own merits.

Business

Birmingham
International
Airport Limited

833 Additional criteria, relating to the Aerodrome Safeguarding of airports within 13 kilometers of all proposals for landfill, should be integral to any site identification strategy and policy. In cases where no alternative solution is available a robust and detailed Bird Hazard Management Plan should be required.

Business

Sustainable
Rugby C/O N
Sanderson

1000 As long as the proximity principle for locally produced waste is adhered to.

Business

Rugby Branch of
the Coventry &
Warwickshire Ch
Com
Business

1160 See W1 and W3

Response ***Response*** ***WI3 comments***
Capacity

Waste Recycling Group Ltd 1339 It is possible to conceive of situations in which landfill will be needed in a part of the region that does not have sufficient despoiled or degraded land. In these cases land raise or the creation of void specifically for landfill may be appropriate. It is possible to have a policy favouring landfill over land raise. The RSS and resulting WDFs must be sufficiently flexible to enable either to be used to handle waste arising in a particular area.

Business

Rugby Friends of the Earth 476 But for inert wastes only.

Interest Group

Health Planning and Development Agency 478 Specific listing on type of fill - recorded for all time.

Interest Group

Forestry Commission 511 Some "degraded"/despoiled" land may have an inherent biodiversity/cultural/Green infrastructure value which should be accommodated. Further landfill provision should be balanced by effective policies/action promoting reduction in residual waste through e.g.. Stronger diversion policies.

Interest Group

Atherstone Civic Society 563 Again the site needs to be chosen carefully as some so called 'despoiled land' has regenerated and is not in need of restoration. Thorough environmental impact assessment needs to be undertaken.

Interest Group

Response Capacity ***Response W13 comments***

Monics Walk Group 871 more recycling and pyrolysis plants

Interest Group

West Midlands Friends of the Earth 917 But for inert wastes only.

Interest Group

Campaign to Protect Rural England 923 Landfill capacity should be reduced as waste is dealt with in more environmentally acceptable ways. The region has a considerable amount of degraded land and mineral workings outstanding and these should prove sufficient for the plan period.

Interest Group

Regional Environment Partnership 1206 The drive should be to reduce landfill to a minimum to deal with regional residual waste.

Interest Group

Herefordshire Council 418 As a catalyst for change of behaviour in the way in which waste in the region is dealt with and to enable alternative technologies to come forward and reduce in price, in comparison to landfill.

LA/Partnerships

Response Capacity ***Response W13 comments***

Worcestershire
County Council

479 The County Council would not support this approach in its entirety as it is too restrictive and would prefer a strategic guiding policy to be more in line with that in the Council's submitted Waste Core Strategy as set out in Policy 11.

LA/Partnerships

Bromyard &
Winslow Town
Council

644 Yes- as a catalyst for change of behaviour in the way in which waste in the region is dealt with and to enable alternative technologies to come forward and reduce in price, in comparison to landfill.

LA/Partnerships

Worcestershire
County Council

646 As restricting the future availability of landfill is seen as key to altering the economic balance in favour of more sustainable forms of waste management.

LA/Partnerships

Walsall Council

759 We support the general principle that once mineral workings cease, they should be restored in as short a timescale as possible. The RSS should support the principle of restoration by landfill where the WPA considers it to be an appropriate method of restoration and where it is consistent with existing

LA/Partnerships

Rugby Borough
Council

771 See W1 and W3

LA/Partnerships

Response Capacity ***Response W13 comments***

Little Comberton Parish Council 777 Make used of old mineral workings

LA/Partnerships

Clent Parish Council 783 by doing this green belt is protected

LA/Partnerships

Staffordshire County Council 837 Restricting the granting of planning permission for new sites for landfill to proposals which are necessary to restore despoiled or degraded land, including mineral workings, or which are otherwise necessary to meet specific local circumstances is supported. The RSS should also acknowledge the requirements for backfilling mineral sites with waste to achieve restoration despite the constraints of EA landfill location policy in terms of protecting the water

LA/Partnerships

Clifton upon Dunsmore Parish Council 953 See W1 and W3

LA/Partnerships

Telford & Wrekin Council 1018 The landfill tax is an incentive to avoid unnecessary tipping and it is not necessary to have regional policy on this matter. Furthermore the tables - if used as guidelines already do this.

LA/Partnerships

Response Capacity ***Response W13 comments***

Gloucestershire County Council 1109 Whilst the waste hierarchy aims to move waste away from landfill, with LATS as a major driver, in achieving this, adequate provision still needs to be made in the West Midlands. In terms of 'new' sites this policy approach may well be an appropriate way forward.

LA/Partnerships

Stratford-on-Avon District Council 1121 Restricting the availability of new landfill sites will also encourage greater levels of recycling.

LA/Partnerships

Redditch Borough Council 1142 Yes, as restricting the future availability of landfill is seen as key to altering the economic balance in favour of more sustainable forms of waste management.

LA/Partnerships

Dudley MBC 1150 Question W13 reiterates existing RSS policy - Policy WD3 c criteria for the Location of Waste Management Facilities refers. Noting the growing need for development land in the Region (especially within the MUAs as part of the required urban renaissance), it is sensible to focus new landfill sites towards despoiled or degraded land (including mineral workings) benefiting from eventual restoration.

LA/Partnerships

South Worcestershire Authorities 1262 As restricting the future availability of landfill is seen as key to altering the economic balance in favour of more sustainable forms of waste management.

LA/Partnerships

Response Capacity Response W13 comments

<p>Shrewsbury & Atcham Borough Council</p> <p>LA/Partnerships</p>	<p>1318 Response put forward by Shropshire County Council who are responsible for Waste Planning and Waste Development Frameworks.</p>
<p>Rugby Borough Council</p> <p>LA/Partnerships</p>	<p>1319 If each WPA does not take account of these arisings then waste will continue to be trans-shipped across borders. If the current sites meet all current legislation and sustainability needs then it makes sense for continued usage rather than seeking new.</p>
<p>CEPOG</p> <p>LA/Partnerships</p>	<p>1340 Mineral workings have a significant long-term impact on the environment and landscape. We therefore support the general principle that once mineral workings cease they should be restored in as short a timescale as possible.</p>
<p>Coventry City Council</p> <p>LA/Partnerships</p>	<p>1345 This would be desirable in terms of looking at priority for sites but surely location in relation to the source of landfill material is also critical. As landfill tax increases there will be a drop off in landfill applications. Revised RSS11 provision should be minimised to meet the needs of the sub-region, and any strategy agreed overspill Regional needs, which cannot be met by waste-to-energy or equivalent facilities or are the result of residues from those facilities. (Ref 5.6.5)</p>
<p>Stafford</p> <p>Other - please specify</p>	<p>116 New landfill will soon be increasingly odd.</p>

Response Capacity ***Response W13 comments***

Natural England
West Midlands 842 Supports the preference to use sites for landfill which are degraded or are despoiled land, including mineral working as this avoids using other areas in the open countryside and should provide regeneration or other after-use benefits.

Other - please
specify

Environment
Agency 1017 we do not agree with the inclusion of a policy that puts such tight limitations on site for landfills that are already subject to stringent locational criteria. There are parts of the region where there is currently very little or no landfill capacity. If some areas are not allowed to build landfills then waste will have to be transported potentially long distances which would lead to greater impact on the environment.

Other - please
specify

Mercia Waste
Management C/O
Axis 654 We do not consider that the RSS policy should restrict the granting of planning permission for new landfill sites for the reasons given above. Existing capacity is running out more quickly than was anticipated and that the PPC regulations are reducing existing permitted capacity. Given these circumstances it is not considered appropriate to set limits on the location of new landfill sites.

Professional

SITA C/O Axis 663 We do not consider that the RSS policy should restrict the granting of planning permission for new landfill sites for the reasons given above. It is acknowledged within the RSS Strategic Options document that existing capacity is running out more quickly than was anticipated and that the PPC regulations are reducing existing permitted capacity. Given these circumstances, it is not considered appropriate to set limits on the location of new landfill sites.

Professional

***Response
Capacity*** ***Response W13 comments***

Network Rail 668 Where landfills are required on a regional or national level, rail should be considered as an option to transport waste to site.

Professional

291 Essential except there should not be the exclusion which are otherwise necessary to meet specific local circumstances this allows loopholes for profit or convenience.

Resident

472 Sorted properly, new ones will not be needed.

Resident

517 Especially in view of additional employment land.

Resident

546 Landfill sites will be needed so potential sites should not be ignored.

Resident

***Response
Capacity*** ***Response W13 comments***

911 Yes, as long as the proximity principle for locally produced waste is adhered to.

Resident

996 Yes, as long as the proximity principal for locally produced waste is adhered to.

Resident

W14 comments

Response Capacity Response W14 comments

Berkley Contract
Services Limited

705 There are other options becoming available which, using the waste hierarchy will reduce landfill and hence all authorities should be aware that it will be difficult to get approval for more landfill sites.

Business

Sustainable
Rugby C/O N
Sanderson

1000 It is prudent to ensure that all landfill sites have an environmental impact assessment and are eligible for a waste management license of permit from the EA.

Business

The Federation of
Small
Businesses West
Midlands

1105 Every hole in the ground already has to be registered. This is correct as there needs to be some control. But a monopoly situation should not be allowed to develop, which is what has happened following the introduction of new waste regulations.

Business

Waste Recycling
Group Ltd

1339 New landfills should be permitted where there is a clear case of need over a specified period related to the anticipated life of the landfill. Such an analysis would need to take account of the realistic expectation of capacity with planning permission coming forward. The non existence of the necessary permit from the EA for such a site would be a relevant consideration.

Business

Response Capacity ***Response W14 comments***

Shropshire Hills
Area of
Outstanding
Natural Beauty
Interest Group

474 This policy could be expanded to show that factors other than just the depletion of existing landfill capacity (e.g. environmental constraints) are likely to play a role in landfill site allocation. If this policy is taken as read there is a real danger that environmental factors may be sidelined.

Rugby Friends of
the Earth

476 An overly complex sentence.

Interest Group

Health Planning
and Development
Agency

478 Take each case on merit/fault/need. Landfill should be a last resort.

Interest Group

Forestry
Commission

511 See W13.

Interest Group

Cannock Chase
Area of
Outstanding
Natural Beauty

733 This policy could be expanded to show that factors other than just the depletion of existing landfill capacity (e.g.. Environmental constraints) are likely to play a role in a landfill site allocation. There is a danger that environmental factors may be sidelined when landfill site allocations are proposed. We suggest that the principle of environmental constraints to site allocation is mentioned at the Regional level.

Interest Group

Response Capacity ***Response W14 comments***

Malvern Hills
AONB
Partnership

775 We feel that this policy could be expanded to show that factors other than just the depletion of existing landfill capacity (e.g.. Environmental constraints) are likely to play a role in landfill site allocation.

Interest Group

West Midlands
Friends of the
Earth

917 The strategy should go further and include extension to existing sites. We see this get out clause as representing a failure of the RSS policies. The reduction of waste airings should be the driver here and the adoption of zero waste policies across the region should in time reduce massively the demand for new capacity across the region.

Interest Group

Campaign to
Protect Rural
England

923 The strategy should go further than this and study both the provision of existing sites with planning permission for landfill and whether the LA/Partnerships has proved that it has exhausted all the alternatives to increasing landfill capacity, such as improved recycling regimes, before planning permission is

Interest Group

Regional
Environment
Partnership

1206 There will be a need for residual landfill but it should be minimised.

Interest Group

Response Capacity ***Response W14 comments***

Herefordshire Council 418 In the interest of environmental protection and insurances that related legislations/regulations are being complied with, it would not be advisable for the WMRSS to only support the allocation of new landfill sites in WDFs, where they are supported by evidence of the depletion of existing landfill capacity and a shortage of capacity in the plan period following a study of the existing sites with planning permission for landfill, but which do not have a waste management license or permit from the Environment Agency.
The WMRSS should encourage that conditions on planning consents for landfill stating that no operation, on these additional site, can begin without first seeking the approval form the Environment Agency in the form of a WML or permit.

LA/Partnerships

Worcestershire County Council 479 The Council generally supports this approach.

LA/Partnerships

Pershore town council 583 waste management license or environmental permit must be sought first.

LA/Partnerships

Worcestershire County Council 646 As restricting the future availability of landfill is seen as key to altering the economic balance in favour of more sustainable forms of waste management.

LA/Partnerships

Walsall Council 759 It is the Environment Agency, not the RPB or the WPAs that dictates where new landfill capacity will be provided for it is the Agency that issues the permits to the operators. In reality it looks as though the RSS will only be able to address the regional requirement for waste disposal capacity if it supports the allocation of new landfill capacity anywhere within the region where there are suitable voids.

LA/Partnerships

Response Capacity ***Response W14 comments***

Clent Parish Council 783 local consultation imperative especially in rural areas

LA/Partnerships

Telford & Wrekin Council 1018 There needs to be a proven case that landfill is required. Locally derived statistics and data need to inform this decision.

LA/Partnerships

Gloucestershire County Council 1109 This would appear to be a reasonable requirement in support of the allocation of new landfill sites.

LA/Partnerships

Redditch Borough Council 1142 Yes, as restricting the future availability of landfill is seen as key to altering the economic balance in favour of more sustainable forms of waste management.

LA/Partnerships

South Worcestershire Authorities 1262 As restricting the future availability of landfill is seen as key to altering the economic balance in favour of more sustainable forms of waste management.

LA/Partnerships

Response Capacity ***Response W14 comments***

Shrewsbury &
Atcham Borough
Council

1318 Response put forward by Shropshire County Council who are responsible for Waste Planning and Waste Development Frameworks.

LA/Partnerships

CEPOG

1340 In practice, the demand for landfill capacity will not necessarily coincide with the supply of suitable landfill voids in any given area, and there are only a limited number of voids suitable for landfill within the region. Unfortunately, it is the Environment Agency, not the RPB or the WPAs, that dictates where new landfill capacity will be provided.
A WPA can allocate as many landfill sites as it likes, but none of them can be implemented without a permit from the Environment Agency.

LA/Partnerships

Coventry City
Council

1345 Yes. However merit should be given to the need for different landfill voids and proximity to the main source of landfill.

LA/Partnerships

Environment
Agency

1017 We consider this question could have been worded more clearly.
We agree that the first step in the process of allocating sites should be a study to identify where there will be shortages in capacity during the plan period. If the capacity study identifies a shortfall in a particular area it is appropriate to first consider sites in that area with planning permission but no permit from the Environment Agency. However there is no guarantee that these sites will obtain a permit as that will depend on environmental considerations such as ground water protection.
We support a process that first considers sites with planning permission and no permit but not exclusively as this would be too restrictive and may result in a capacity shortfall during the plan period. Sites should be allocated to meet the needs identified in the capacity study and this could mean considering developing new sites and not only ones that already have planning permission.

Other - please
specify

Response Capacity ***Response W14 comments***

Mercia Waste Management C/O Axis

654 We do not agree with the second part of Strategic Option W14 on the basis that many of the undeveloped sites with current/historic planning permissions may no longer represent the most appropriate location in many circumstances e.g. proximity to the Major Urban Areas and the standard of transportation links to the major areas of waste arisings. Furthermore, some of the sites that do have planning permission and are suitably located may not be able to obtain a permit from the Environment Agency.

In addition, whilst it is acknowledge that there are a number of sites with previous planning permissions, they are not distributed evenly across the Region and, in particular, there are few located within the south west of the region.

Professional

SITA C/O Axis

663 We do not agree with the second part of the Strategic Option W14 on the basis that many of the undeveloped sites with current/historic planning permissions may not represent the most appropriate location in many circumstances e.g.. In respect of their proximity to the Major Urban Areas and the standard of transportation links to the major areas of waste arisings. Furthermore, some of the sites that do have planning permission and are suitably located may not be able to obtain a PPC Permit from the Environment Agency.

Professional

1 Can't you just stipulate that all authorities operate to a 'zero waste' principle, and thereby removing the whole need for WDFs and WPAs etc? Think of all the money you could save from sacking all of those local government office monkeys.

Resident

46 The allocation of new landfill sites needs to be considered very carefully before being implemented.

Resident

***Response
Capacity***

Response W14 comments

291 WMRSS should oppose all landfill sites (new ones) there is still too much landfill with environmental disadvantages we need more far more sustainable recycling by households and businesses.

Resident

472 Sorry don't understand the question, sentence too long and goes back on itself.

Resident

546 This should be left to local authorities.

Resident

678 Don't understand this question - it is too long

Resident

911 No, it is prudent to ensure that all landfill sites have an environmental impact assessment and are eligible for a waste management license or permit from the EA.

Resident

Response Capacity ***Response W14 comments***

Brandwood West
Neighbourhood
Forum

966 If this is properly monitored and regulated. Again this has to be absolutely safe for people and wildlife.

Resident

996 It is prudent to ensure that all landfill sites have an environmental impact assessment and are eligible for a waste management license or permit from the EA.

Resident

W15 comments

Response Capacity Response W15 comments

Berkley Contract Services Limited 705 This is more of a sound bite. The principle must be that agricultural waste is dealt with at/near its original location. This may mean more facilities but smaller ones or best of all to develop practices on the farms themselves so that the waste does not

Business

The Federation of Small Businesses West Midlands Business 1105 This is taking things further than the waste industry is already doing.

Waste Recycling Group Ltd 1339 It is likely that much agricultural waste could be treated or disposed of alongside other waste streams. For example anaerobic digesters could treat farm slurry, sewerage sludge and the biological fraction of household and C+1 waste alongside each other

Business

Shropshire Hills Area of Outstanding Natural Beauty 474 the West Midlands AONBs support the inclusion in the WMRSS of a policy based on the premises outlined in question W15 The provision of sites for the treatment and management of agricultural waste if subject to the criteria proposed would support the industry

Interest Group

Rugby Friends of the Earth 476 If treatment/management includes new technologies for the production of biogas.

Interest Group

Response Capacity ***Response W15 comments***

Health Planning
and Development
Agency

478 All waste should be subject to equal constraints.

Interest Group

Forestry
Commission

511 Opportunities for promoting sustainable use of agricultural and forest derived wood based wastes are important in supporting sustainable consumption and production - e.g. Biomass fuels.

Interest Group

The National
Trust

661 Anaerobic digestion for energy production should be promoted for suitable agricultural wastes.

Interest Group

Cannock Chase
Area of
Outstanding
Natural Beauty

733 The West Midlands AONBs support the inclusion in the WMRSS of a policy based on the premises outlined in question W15. Agriculture is one of the most important industries within the West Midlands AONBs. The provision of sites for the treatment and manage

Interest Group

Malvern Hills
AONB
Partnership

775 The West Midlands AONBs support the inclusion in the WMRSS of a policy based on the premises outlined in question W15. Agriculture is one of the most important industries within the West Midlands AONBs and all AONBs required to take account of its needs.

Interest Group

Response Capacity ***Response W15 comments***

Peak District
National Park
Authority

332 RSS should promote links between energy production and waste disposal in the agricultural sector, recognising the potential of biomass and slurry disposal in this context. This will add to rural regeneration opportunities.

LA/Partnerships

Herefordshire
Council

418 In light of tighter restrictions on agricultural holdings disposing of their waste on their own land, potentially resulting in an increase in the waste having to be dealt with outside of the agricultural holding, it is a sensible conclusion that the WMRSS

LA/Partnerships

Worcestershire
County Council

479 The amounts are very small and would not warrant such an approach. Managing agricultural waste should be left to the discretion of the individual Local Planning Authorities. It is questionable whether this is a role of a regional strategy.

LA/Partnerships

Wyre Forest
District Council

762 Broadly support the suggested criteria based approach.

LA/Partnerships

Clent Parish
Council

783 based on collecting by county planning authority

LA/Partnerships

Response Capacity ***Response W15 comments***

Kington Town Council

973 Regulation should be through cross compliance via DEFRA.

LA/Partnerships

Telford & Wrekin Council

1018 We do not consider that a regional policy would add value to the local planning process unless there is evidence to suggest that there is a shortfall of these facilities that is not being picked up through the LDF.

LA/Partnerships

1 Again, with a zero waste policy you wouldn't have to worry about these - it would be an issue for environmental health/police to police the illegal dumping of waste, and it would force producers and consumers alike to deal with their own waste and to pay

Resident

291 Sustainable agricultural waste policies are essential we should aim for 100% of agricultural waste being recycled and used or transport locally to reduce transport pollution

Resident

472 The land will benefit, as it always has done in the past from animal manure. Not rivers or near same.

Resident

***Response
Capacity*** ***Response W15 comments***

996 Yes, whilst encouraging the use of anaerobic digestion and composting facilities.

Resident

W16 comments

Response Capacity Response W16 comments

Birmingham Chamber of Commerce & Industry Business

971 Such requirements should not be placed upon every planning application and should not be stipulated within the revised WMRSS.

Confederation of West Midlands Chamber of Commerce Business

972 Such requirements should not be placed upon every planning application and should not be stipulated within the revised WMRSS.

Sustainable Rugby C/O N Sanderson

1000 But this criteria should apply to smaller planning applications wherever possible to discourage waste and encourage sustainability.

Business

Rugby Branch of the Coventry & Warwickshire Ch Com

1160 Developers be required to address these issues and not just in relation to "major" applications. This could also be introduced as part of "E10" considerations and it would be useful to have this information up front as recycling is becoming an important part of the sustainability agenda. While Design and Access statements can now be required for the registration of applications this is because this has been specifically included in the legislation.

Business

Waste Recycling Group Ltd

1339 This should be encouraged but it might be unduly bureaucratic to require it.

Business

Response Capacity Response W16 comments

Rugby Friends of the Earth

476 And not only new developments.

Interest Group

Health Planning and Development Agency

478 See W15 - any change should include impact.

Interest Group

Warwickshire Rural Community Council

508 Local planning Authorities should include a requirement for a Site Waste Management Plan in the circumstances described.

Interest Group

Atherstone Civic Society

563 Good idea

Interest Group

West Midlands Amenity Societies Association

569 Absolutely - we are glad to see you have the lower limit as low as 10 dwellings. This approach should be extended to water and power usage as well, and to the overall sustainability of the dwellings built (their design, materials used etc) Building regulations are just not stringent enough in the content of our need to reduce energy consumption.

Interest Group

***Response
Capacity*** ***Response W16 comments***

Campaign to
Protect Rural
England

642 CPRE (Staffordshire) would be cautious in imposing this requirement as it could lead to a greater complexity and delay added to the planning process which it is the government's intention to reduce. Consideration should be given to whether a valid condition could be attached to all such planning permissions requiring the submission and approval of a Site Waste Management Plan

Interest Group

Monics Walk
Group

871 provide communal compost sites. Currently high density of estates lack gardens able to contain bins.

Interest Group

West Midlands
Friends of the
Earth

917 This should be adopted BUT it should not just apply to new developments. LA's could, in conjunction with existing communities, develop criteria for Local Resource Management Plans, which include floor targets for reducing, reusing repairing and recycling resources. These targets should, of course, be increase year on year.

Interest Group

Campaign to
Protect Rural
England

923 This should certainly be adopted and local authorities should develop criteria for Site Waste Management Plans, which include targets for reducing and recycling waste.

Interest Group

Ludlow 21

1020 This will focus the minds of developers in planning for this vital function.

Interest Group

***Response
Capacity*** ***Response W16 comments***

Diocese of Worcester 1093 To help increase the awareness of the true cost of waste, and encourage re-use

Interest Group

Regional Environment Partnership 1206 This should be a conformity matter as well on strategic planning applications.

Interest Group

Northamptonshire County Council 385 We fully support this approach but seek to extend it to encompass residential development of over 1 dwelling and all industrial and commercial development. We also fully support the approach outlined in W17 and W18

LA/Partnerships

Herefordshire Council 418 Increasingly developers are going to have to be aware and find solutions for the resulting waste generated from the developments they complete (i.e. the waste generated during the construction and demolition phases of new development). Site Waste Management Plans would be a suitable suggestion to be included as a requirement in local validation checklists.

LA/Partnerships

Worcestershire County Council 479 The Council would support the approach but as set out this is considered too prescriptive for a regional strategy.

LA/Partnerships

Response ***Response*** ***W16 comments***
Capacity

Bromyard &
Winslow Town
Council

644 This Council feels that the introduction of such measures is too stringent, this would add to the cost of effected developments which would not result in achieving the increased requirements for Affordable Housing.

LA/Partnerships

Worcestershire
County Council

646 SWMPs are strongly supported and Government should be urged to implement Section 54 of the Clean Neighbourhoods and Environment Act 2005 at the earliest possible opportunity.

LA/Partnerships

Bridgnorth District
Council

746 It is considered that waste should be determined locally.

LA/Partnerships

Newcastle Under
Lyme Borough
Council

758 Whether waste management is controlled as a condition or in the submission of details is an operational matter, but the content of the validation checklist will be determined by DCLG not by planning authorities.

LA/Partnerships

Walsall Council

759 Question W16 goes to far. It is not the role of the RSS to dictate to local planning authorities how they should undertake validation of planning applications. At the present time, it is not clear whether the Government is proposing to address the SWMP requirement through the planning process or through other legislation. There are real problems in collecting monitoring data about the availability of waste management capacity in the region which is at the right geographic scale and accurate enough to inform strategic planning for waste.

LA/Partnerships

Response Capacity ***Response W16 comments***

Wyre Forest District Council

762 Sufficient regard will need to be given to the practicalities of implementing this initiative in relation to all relevant planning applications submitted for development over the prescribed thresholds as this would have resource implications for all Local Planning Authorities.

LA/Partnerships

Rugby Borough Council

771 Developers be required to address these issues and not just in relation to "major" applications. This could also be introduced as part of "E1A" considerations and it would be useful to have this information up front as recycling is becoming an important part of the sustainability agenda. While Design and Access statements can now be required for registration of applications this is because this has been specifically included in the legislation.

LA/Partnerships

Clent Parish Council

783 attention waste

LA/Partnerships

Lichfield District Council

830 Unless this could be reconciled with the requirement for Site Waste Management Plans in connection with development proposals subject to the Clean Neighbourhoods and Environment Act 2005 Chapter 5 Section 54.

LA/Partnerships

Staffordshire County Council

837 A RSS policy requiring all Planning Authorities to include a requirement for Site Waste Management Plans in their local validation checklists is supported. Policy 6 of the Waste Local Plan acknowledges the waste implications of major development proposals and supports on-site waste management.

LA/Partnerships

Response ***Response*** ***WI6 comments***
Capacity

Clifton upon
Dunsmore Parish
Council

953 Developers be required to address these issues and not just in relation to "major" applications. This could also be introduced as part of "E10" considerations and it would be useful to have this information up front as recycling is becoming an important part of the sustainability agenda. While Design and Access statements can now be required for the registration of applications this is because this has been specifically included in the legislation.

LA/Partnerships

Kington Town
Council

973 Entire site development specification should include waste management and conservation of utilities including water.

LA/Partnerships

Telford & Wrekin
Council

1018 This would be desirable and having a statutory framework would aid implementation.

LA/Partnerships

Gloucestershire
County Council

1109 Yes, certainly and developers should consider waste issues during the design stage and as well as the construction and occupation phases.

LA/Partnerships

Stratford-on-Avon
District Council

1121 Policy PR.5 of the Stratford District Local Plan Review expects all development to minimise the depletion of irreplaceable resources. In particular it notes that the intended means of minimising, re-using and disposing of demolition and construction materials will be taken into account in appropriate cases. This new procedural measure could provide a practical way to implement this policy.

LA/Partnerships

Response Capacity ***Response W16 comments***

Redditch Borough Council 1142 Yes, SWMPs are strongly supported and Government should be urged to implement Section 54 of the Clean Neighbourhoods and Environment Act 2005 at the earliest possible opportunity.

LA/Partnerships

Dudley MBC 1150 The sentiments are supported. This is not a matter for RSS but for local decision, but the supporting text might include encouragement for this. A Site Waste Management Plan (SWMP) would contribute towards sustainable development in that it helps maximise use of construction materials/products delivered to site, reduces the levels of waste produced during a site's development or redevelopment, and makes better re-use of that waste produced (by re-using on site or via recycling). Requiring SWMP's would also be of value in planning policy terms as regards annual monitoring requirements - e.g.. Quantifying the production of recycled aggregates.

LA/Partnerships

Oswestry Borough Council 1154 Shropshire County Council is the Waste Planning Authority and has allocated sites in their waste plan including a new site in Oswestry for Household Waste recycling and Waste Transfer. The issue of 'Managing Waste in New Developments' is locally more interesting and would alleviate problems of storage and access. Currently the Shropshire Waste Partnership is negotiating the long term management of Municipal waste. The revised national Waste Strategy being produced by DEFRA is long overdue and is eagerly awaited by local authorities.

LA/Partnerships

South Worcestershire Authorities 1262 SWMPs are strongly supported and Government should be urged to implement S54 of the Clean Neighbourhoods and Environment Act at the earliest possible opportunity.

LA/Partnerships

Response Capacity ***Response W16 comments***

Shrewsbury &
Atcham Borough
Council

1318 This approach is supported in principle.

LA/Partnerships

Rugby Borough
Council

1319 Developers may be required to address these issues and not just in relation to "major" applications. This could also be introduced as part of "E1A" considerations and it would be useful to have this information up front as recycling is becoming an important part of the sustainability agenda.

LA/Partnerships

CEPOG

1340 Question W16 goes too far. It is not the role of the RSS to dictate to local planning authorities how they should undertake validation of planning applications. Whilst we agree that Site Waste Management Plans (SWMP) should be required for planning applications that are likely to generate a significant amount of waste, this requirement needs to be addressed at a national level, not at a regional or local level.

LA/Partnerships

Coventry City
Council

1345 Yes. It should also include the construction phase.

LA/Partnerships

Stafford

116 No comment.

Other - please
specify

Response ***Response*** ***WI6 comments***
Capacity

Government
Office for the
West Midlands

587 It is not clear how the proposals relating to the design of new developments are 'regionally specific'. We consider that detailed matters such as these should be dealt with at the local level.

Other - please
specify

Environment
Agency

1017 We very much support the requirement that all planning applications need to have a Site Waste Management Plan (SWMP). We consider they are essential to bring down the tonnage of waste in the construction sector and reduce fly tipping. We consider a SWMP should be produced for all developments down to individual houses a SWMP need not be a major burden on a developer and can even help to make the build more efficient and cheaper. We would like the policy to require all development proposals to provide a site SWMP.

Other - please
specify

Rugby Radio
Station Limited
Partnership

1070 A requirement for a Waste Management Plan for small sites seems onerous. The threshold for such a requirement should be increased to deal with major developments only.

Professional

Home Builders
Federation

1086 This is not a matter for validation. If necessary, it could be sought through planning conditions attached to a decision notice.

Professional

Tesco Ltd. C/O
Nathaniel
Lichfield and
Partners

1298 Tesco considers that all aspects of should be encouraged. Tesco however recognise that neither PPS10 not the DCLG best practice guidance for validating applications, require the submission of a Waste Management Plan. Tesco therefore consider that to make a Waste Management Plan a requirement before validating an application would be too onerous.

Professional

***Response
Capacity***

Response W16 comments

1 Again, just have a zero waste policy then you don't even have to worry about forcing developers to pay for a 'site waste management plan' which will create extra expense and just generate more work for consultants - the cost of which will be transferred to the house buyer.

Resident

291 Essential but 10 dwellings is too high and lenient planning applications of 2 or more dwellings should require a site waste management plan in which transport of site waste should be kept low

Resident

472 Another difficult long sentence, please use clear English.

Resident

546 Too much government

Resident

678 Surprised that this isn't already in place ...?

Resident

***Response
Capacity*** ***Response W16 comments***

684 Not clear why this should be a minimum of ten. Why not all?

Resident

911 Yes, but this criteria should apply to smaller planning applications wherever possible to discourage waste and encourage sustainability.

Resident

Brandwood West
Neighbourhood
Forum

966 Yes and must include a mini recycling area for all types of waste.

Resident

996 Yes, but this criteria should apply to smaller planning applications wherever possible to discourage waste and encourage sustainability.

Resident

W17 comments

Response Capacity Response W17 comments

Birmingham Chamber of Commerce & Industry Business	971	Such requirements should not be placed upon every planning application and should not be stipulated within the revised WMRSS.
Confederation of West Midlands Chamber of Commerce Business	972	Such requirements should not be placed upon every planning application and should not be stipulated within the revised WMRSS.
The Federation of Small Businesses West Midlands Business	1105	Needs to be flexible to allow for changes.
Waste Recycling Group Ltd	1339	This information will be required to demonstrate the need case for all significant waste management projects. For those subject to EIA it is an essential requirement for describing the proposal. For smaller projects where it is not necessary to provide this information for existing reasons it probably is insufficiently relevant to warrant such a policy.
Business		
Rugby Friends of the Earth	476	And not only new developments.
Interest Group		

Response Capacity ***Response W17 comments***

Health Planning
and Development
Agency

478 Tracking throughout helps improvement targets.

Interest Group

West Midlands
Amenity
Societies
Association

569 Would there be a problem where the waste management authority is not the planning authority (as in the case of most two-tier authorities)? This could be an excessive a requirement - we suspend judgements.

Interest Group

Campaign to
Protect Rural
England

642 this seems an essential part of any such application

Interest Group

West Midlands
Friends of the
Earth

917 We see no reason not to include such a requirement.

Interest Group

Campaign to
Protect Rural
England

923 This should be adopted as it is good practice.

Interest Group

***Response
Capacity*** ***Response W17 comments***

Ludlow 21 1020 this is surely key information required to assess the viability of any application?

Interest Group

Diocese of
Worcester 1093 See W16

Interest Group

Regional
Environment
Partnership 1206 Without good data the waste streams cannot be damaged.

Interest Group

Herefordshire
Council 418 Currently, monitoring is considered to be insufficient on waste capacity in the region and therefore in order to ensure that provisions for handling and processing waste is judged to be adequate for its purpose, accurate and regular monitoring would be necessary. A requirement for local validation checklists on planning applications for waste management facilities to include information on annual throughput capacity in tonnages/litres/cubic metres would be useful. Improvements in monitoring would also benefit waste managers in local authorities in developing their understanding of commercial and industrial

LA/Partnerships

Worcestershire
County Council 646 This is strongly supported to provide a means of quantifying availability of waste management capacity and the extent of diversion from landfill.

LA/Partnerships

Response Capacity ***Response W17 comments***

Wyre Forest
District Council

762 Broadly support the proposed approach.

LA/Partnerships

Clent Parish
Council

783 especially where antiquated sewage etc pouring additional waste to facilitate that cannot cope

LA/Partnerships

Gloucestershire
County Council

1109 Yes, this would be beneficial for WPAs in calculating potential capacity gaps.

LA/Partnerships

Redditch Borough
Council

1142 Yes, this is strongly supported to provide a means of quantifying availability of waste management capacity and the extent of diversion from landfill.

LA/Partnerships

Dudley MBC

1150 See response to W16. Throughput information should be included with a waste management application as a matter of course. However, such a requirement would assist with monitoring returns and would help to determine what additional waste management facilities may be required.

LA/Partnerships

Response Capacity ***Response W17 comments***

South Worcestershire Authorities	1262	this is strongly supported to provide a means of quantifying availability of waste management capacity and the extent of diversion from landfill.
LA/Partnerships		
Shrewsbury & Atcham Borough Council	1318	Response put forward by Shropshire County Council who are responsible for Waste Planning and Waste Development Frameworks.
LA/Partnerships		
CEPOG	1340	Question W16 goes too far. It is not the role of the RSS to dictate to local planning authorities how they should undertake validation of planning applications. Whilst we agree that it should be a requirement to provide this information with planning applications for new waste management facilities, this requirement needs to be addressed at a national level, not at a regional or local level.
LA/Partnerships		
Coventry City Council	1345	Yes. The information will need to be verified.
LA/Partnerships		
Environment Agency	1017	we very much support the policy requiring waste management facilities to include information on annual throughout capacity. If waste disposal is to be managed correctly in the region this type of data needs to be available to the Local Authorities and the Environment Agency.
Other - please specify		

Response Capacity ***Response W17 comments***

Mercia Waste Management C/O Axis

654 Information should always be provided in this regard, but it must be accepted that circumstances will, for numerous reasons, shift and that waste throughout would not be constant.

Professional

SITA C/O Axis

663 Information should always e provided in this regard, but it must be accepted that circumstances will, for numerous reasons shift, and that waste throughput would not be constant.

Professional

21 WASTE - a big problem caused by the packaging industry.

Resident

291 Essential all new developments should be required to follow high resource efficiency high sustainability high environmental protection and low pollution - emissions levels

Resident

472 Help, what do you mean?

Resident

Response Capacity ***Response W17 comments***

546 Too much government

Resident

Brandwood West
Neighbourhood
Forum

966 More and more people would use and look after mini recycling centres. Especially glass collection. Ours works wonderfully and you can contact me to come and visit it any time. We openly promote our site.

Resident

W18 comments

Response Capacity Response W18 comments

Berkley Contract Services Limited	705	Community recycling MUST become a part of everyday life and this is easier to develop in new communities. They should separate recyclables themselves and become part of the process.
Business		
National Farmers Union	726	This will support the move up the waste hierarchy. It will be particularly important in housing developments.
Business		
Birmingham Chamber of Commerce & Industry	971	Appropriate storage of waste is important in all areas of the West Midlands. Local authorities should make decisions on segregated storage at a local level, thus negating the need for a Regional requirement.
Business		
Confederation of West Midlands Chamber of Commerce	972	The appropriate storage of waste is important in all areas of the West Midlands. Local authorities make decisions on segregated storage at a local level, thus negating the need for a regional requirement.
Business		
Sustainable Rugby C/O N Sanderson	1000	Yes as segregated waste will reduce disposal costs and also improve recycling and recovery options.
Business		

Response Capacity ***Response W18 comments***

Rugby Friends of
the Earth

476 And not only new developments.

Interest Group

Health Planning
and Development
Agency

478 Design of waste storage is vital for safety.

Interest Group

Warwickshire
Rural Community
Council

508 Local Development Documents should include policies to this effect.

Interest Group

Forestry
Commission

511 Yes - provision needs to be balanced with.

Interest Group

West Midlands
Amenity
Societies
Association
Interest Group

569 Absolutely - see our comments in W 16 above.

***Response
Capacity*** ***Response W18 comments***

West Midlands
Friends of the
Earth

917 And again this should not only apply to new developments BUT could, in association with existing communities be extended to include exploring the necessary introduction of such facilities for them. Again targets which are floor targets and which increase year on year also be included.

Interest Group

Campaign to
Protect Rural
England

923 This should certainly be adopted and local authorities should develop criteria for Site Waste Management Plans, which include targets for reducing and recycling waste.

Interest Group

Ludlow 21

1020 Yes, this is an essential requirement if new regulations for the recycling / disposal of waste are to work effectively.

Interest Group

West Midlands
Wildlife Trusts

1038 This should be in the relevant DPDs in every LDF.

Interest Group

Regional
Environment
Partnership

1206 The proposal at higher growth for the development of sustainable communities means the integration of waste from the across all levels of development.

Interest Group

Response Capacity ***Response W18 comments***

Herefordshire Council 418 It is important to "build in" the infrastructure to enable future residents of new development, whether residential, industrial, commercial and /or retail, to easily and safely dispose appropriately of the waste generated in their home and businesses. Therefore the WMRSS should require LDDs to have policies that require provision as part of new residential, commercial and industrial development for the segregated storage of waste and for on-site waste management to be part of the "Design and Access Statements".

LA/Partnerships

Worcestershire County Council 479 It is acceptable for the WMRSS to do this but the detail of the policy should be for the Local Planning Authority to decide.

LA/Partnerships

Worcestershire County Council 646 This links with the Joint MWS for Herefordshire and Worcestershire published in November 2004 (see policy 14). Local Authorities are mainly concerned with management of Municipal Waste and have limited experience in dealing with some Commercial and Industrial waste from Small Medium Enterprises (SMEs) and no experience of dealing with Agricultural waste. It is therefore difficult to comment on these waste streams due to the limited role that the LA/Partnerships has in dealing with them.

LA/Partnerships

East Staffordshire Borough Council 736 Requiring all Local Development Framework documents to include policies so that new development has to include segregated storage of waste and on-site waste management, question is acceptable only as long as all districts apply this - failure by one authority may lower development costs in that district, and attract developers away from neighbouring districts.

LA/Partnerships

Response Capacity ***Response W18 comments***

Bridgnorth District Council 746 It is considered that waste should be determined locally.

LA/Partnerships

Newcastle Under Lyme Borough Council 758 The approach is a good one in principle, but it is doubtful whether the RSS can dictate the content of all LDS in this way. Furthermore, this runs counter to the government's intention to reduce the number and level of detail of policies in LDDs.

LA/Partnerships

Walsall Council 759 Question W18 misses the point. It would be more appropriate for the RSS to include a policy requiring such provision to be made, than for it to require WPAs to do it, or to attempt to dictate to them what they should require applicants to provide in Design and Access Statements without having considered other design and access issues.

LA/Partnerships

Wyre Forest District Council 762 Agree with the broad principle i.e.. That the RSS could include a requirement for LPAs to prepare policies to promote recycling but suggest that the detail might be more appropriately addressed through the preparation of LDFs to suit local circumstances and the needs of local waste management systems.

LA/Partnerships

Clent Parish Council 783 developers must take responsibility as part of the design for future disposal of waste

LA/Partnerships

Response Capacity ***Response*** ***W18 comments***

Telford & Wrekin Council

1018 Subject to environmental acceptance and bearing in mind the need to maximise housing growth on PDL within the MUA's.

LA/Partnerships

Gloucestershire County Council

1109 Yes.

LA/Partnerships

Stratford-on-Avon District Council

1121 This measure should help achieve an increase in the amount and proportion of household waste recycled or composted, which is a target of the Stratford District's Community Plan.

LA/Partnerships

Redditch Borough Council

1142 Yes this links with the Joint MWS for Herefordshire and Worcestershire published in November 2004 (see policy 14)

LA/Partnerships

Dudley MBC

1150 See response to W16. Inclusion of an "advocacy" statement would be supported. There should be flexibility to determine the most appropriate provisions for sustainable waste management in new developments on a site by site basis.

LA/Partnerships

Response Capacity ***Response W18 comments***

Shrewsbury &
Atcham Borough
Council

1318 This approach is fully supported, though it is a matter for Local Planning Authorities to determine rather than RSS.

LA/Partnerships

CEPOG

1340 It would be more appropriate for the RSS to include a policy requiring such provision to be made, than for it to require WPAs to do it, or to attempt to dictate to them what they should require applicants to provide in Design and Access Statements.

LA/Partnerships

Coventry City
Council

1345 Yes. It would be useful to include consultation with the local waste collection authority.

LA/Partnerships

Environment
Agency

1017 We very much support a policy in the RSS requiring Local Development Documents to have policies supporting the consideration of waste management at the design stage. We consider waste management should also be included in the design and access plan. Well designed homes and business will encourage recycling by making space for the segregated waste streams so that it is as easy to recycle waste as to dispose of waste.

Other - please
specify

English Heritage

1141 Consideration at the earliest stage as part of the overall design process is generally recommended.

Other - please
specify

Response Capacity ***Response W18 comments***

Home Builders Federation

1086 The HBF does not consider this to be a regionally specific issue. The segregation of waste within a development can be difficult and particularly, identified areas for waste within a development site can lead to various environmental and social and maintenance issues.

Professional

West Midlands Development Group C/O Barton Wilmore

1288 We consider it inappropriate for the WMRSS to include detailed policies in respect of waste management on new development. The appropriateness of such policies should be considered at the local level and on a site by site basis so as not to place unnecessary constraints on development which could ultimately, if applied on a blanket basis, discourage sites from being brought forward for development, thus putting the delivery of new housing at risk.

Professional

Tesco Ltd. C/O Nathaniel Lichfield and Partners

1298 Tesco consider that LPAs should have to consider waste storage and management in the determination of planning applications. It is however not for the RSS to require additional information over and above that required at the national level.

Professional

21 Do they have any IDEAS?

Resident

291 as for answers to w15, w16, w17

Resident

***Response
Capacity***

Response W18 comments

354 The Bilford Road site is an ideal model for this being possible.

Resident

472 Absolutely

Resident

546 Too much government

Resident

911 Yes as segregated waste will reduce disposal costs and also improve recycling and recovery options.

Resident

Brandwood West
Neighbourhood
Forum

966 Absolutely. Underground centres worry me a little as small animals and children could climb in and die. Is this could be made defer then yes, yes, yes!

Resident

***Response
Capacity*** ***Response W18 comments***

996 Yes, as segregated waste will reduce disposal costs and also improve recycling and recovery options.

Resident

1320 It seems to me that whatever is wanted by people who are not bureaucrats (paid to spend their time doing things like this - WMRSS), will not happen. You are just going through the motions of asking us, because it looks more democratic. But in the end, the destroyers of the country will win, because it is easier to break down than to build. Once our Greenbelt has gone, it will not be returned.

Resident

Waste - General

Response Response General Comments (Waste) Capacity

Peplow Jewellers	681	We find it immensely frustrating that our council still fails to provide us with recycling facilities for suitable materials. Each year the commercial waste collections are subject to price increases blamed partly on an increase in the government landfill tax. Businesses like ours have the desire to recycle and it is quite wrong for much of our waste to go into landfill.
Business		
Hertfordshire & Worcs Chamber of Commerce	808	While our members do not wish to see the expensive transfer of waste over long distances, we do believe that waste should be dealt with on a regional basis and that there should be sufficient plant within the region to process the waste efficiently.
Business		
Gazeley UK Ltd	947	Waste disposal can be a major generator of road transport, noise and dust with potential adverse effects on safety and air quality. Contaminants such as polycyclic aromatic hydrocarbons (PAHs), heavy metals, oil, asbestos and landfill gases are injurious to health.
Business		
Birmingham Chamber of Commerce & Industry	971	Business is open to all possible methods of disposing waste, provided that disposal sites are allocated in proper balance with other key land uses within the West Midlands. The revised WMRSS must prioritise the recycling of as much waste as possible, in order to ensure that the West Midlands' landfill needs are minimal. Business understands the important role that recycling should play and calls upon the planning climate within the city to encourage and not dissuade firms from recycling as much waste as they are able to.
Business		

Response Capacity **Response** **General Comments (Waste)**

Confederation of West Midlands Chamber of Commerce 972 Business is open to all possible methods of disposing waste, providing that disposal sites are allocated in proper balance with other key land uses within the West Midlands. The revised WMRSS must prioritise the recycling of as much waste as possible, in order to ensure that the West Midlands' landfill needs are minimal. Business understands the important role that recycling should play and calls upon the planning climate within the region to encourage and not dissuade firms from recycling as much waste as they are able to.

Business

West Mids Forestry Framework 335 The options do not make explicit the impacts for climate change or what mechanisms will be used to mitigate any possible impacts. This could result in emissions that are contrary to the national targets to stabilise and reduce greenhouse gas emissions by a minimum 60% of 1990 levels in 2050. RSS should include a cross-cutting policy to address climate change so that it is a key and integrating theme and the Sustainability Appraisal of the preferred option should incorporate further climate change proofing: * Clear targets to meet the region's share of national targets for the stabilisation and reduction of carbon dioxide emissions, and renewable energy targets for new developments in line with PPS22 and consistent with the Governments aspirational target of 20% by 2020. * Measures to ensure that the region adapts to the predicted impacts of climate change, e.g.. Flood risk, higher temperatures, water shortages, loss of biodiversity.

Development proposed should take account of guidance in draft PPS1 supplement and guidance on zero carbon developments. Specifically: * Located so as to minimise the need to travel and offer high quality choices of a variety of modes of transport other than the car; * Ensuring opportunities for low carbon energy supply and supporting infrastructure are maximised; * Of a type and density that minimises carbon dioxide emissions so that all new developments are zero carbon by 2016; * Concentrated in larger developments which offer the greatest opportunities for high environmental standards, low carbon emissions and decentralised energy generation; * Designed and constructed to the very highest possible standards to avoid the need for future retrofitting of measures to reduce emissions, conserve water and the use of non-renewable materials. Setting designs standards Eco-homes "excellent" for example whilst ensuring West Midlands Sustainable Checklist for Developments is used and adopted. To ensure Zero carbon developments by 2016 government suggests, based on the Code for Sustainable Homes, Code level 3 by 2010 and Code level 6 by 2016. These targets should be adopted.

RSS should recognise that improvements to the existing housing stock are essential, as new development will only be a very small proportion of the overall stock still standing in 2026, and should encourage retrofitting. If all new developments are low carbon developments, the RSS is only likely to stabilise current emissions if action is not taken to improve the energy performance of existing stock.

Technical work on the carbon dioxide emissions/projections and ecological footprint of the housing options needs to be a key consideration in developing the preferred option.

The impact of the waste options on greenhouse gas emissions must be a key consideration in developing the preferred option, so reducing the amount of waste going to landfill is likely to be the best option.,

Interest Group

Response Capacity ***Response*** ***General Comments (Waste)***

Lichfield Civic Society 342 We support the need to minimise the amount of waste disposed of to landfill and to increase recycling rates. Waste management facilities, particularly those associated with recycling are increasingly sophisticated operations which, in our view, often can be satisfactorily accommodated on industrial estates without any detriment to the environment. We believe in Regional self sufficiency for the management of waste. We consider it improbable that each County or Unitary Authority will have adequate land or other resources, which often can be of a specialist nature, to accommodate or treat all its waste arising within its area. Finally, we remain sceptical of the value of site waste management plans for new developments. We do however, believe that housing designs should give consideration to the provision of adequate spaces for the storage of waste bins and boxes.

Interest Group

Worcester Forum for Older People 423 Waste management will be extremely difficult when there are almost twice as many people to service. The move to fortnightly collections which are being phased in will not be viable. The impact of hundreds of thousands of bins with two weeks worth of rubbish will have a considerable impact on health, and the vermin population will escalate enormously. In warm weather the smell from drains in the street is palpable. They used to be cleared and cleaned regularly, but it is not happening now. This is a health hazard and should be a big part of public services.

Interest Group

Alrewas Conservation Group 497 The aim must be to recycle as much waste as possible and incinerate the rest using the energy produced from the heat created by the process for useful purposes. Landfill sites can then be reclaimed and reused. Construction & Demolition Waste - recycle as much as possible. Reuse timber. Crush brick and concrete for hard core. Or when possible reuse old bricks. There is a high demand for these as a house built in a rural area using old bricks fits in much better with the environment. Landfill - this should be stopped as soon as possible for the alternative of recycle or incinerate. Managing waste in new developments - if the amount of proposed new dwellings is greatly reduced there would be far less problems from waste. By 2020 the OECD estimates, we could be generating 45% more waste than we did in 1995. Obviously we must reverse this trend if we are to avoid being submerged in rubbish. The EU is aiming for a significant cut in the amount of rubbish generated, through new waste prevention initiatives, better use of resources and encouraging a shift to more sustainable consumption patterns.

Interest Group

Response Capacity Response General Comments (Waste)

West Midlands Amenity Societies Association	569 West MASA General Comment on Transport and Accessibility Options: What is clear is that the implementation of many of the elements of the RTS depends on the actions of providers whether the operators or financiers. What it does not mention is how these organisations will co-operate in implementing the policy. It is not clear how the current proposals will address the need to make rail and bus more attractive. The transport policies in the document are very limited and do not properly address the issues arising from the housing and employment allocations. The consequences for sustainable transport of the substantial increase in housing development under Options 2 and 3 are not brought out. The various options discussed avoid any detailed justification for deviating from existing Policy T6A. The resulting location suggestions appear to fail to meet the element of current policy, particularly in the locations proposed. There is no discussion of the implications of Policy T6D. This is a major omission from the questions posed, and must cast doubt on the robustness of the three options outlined. We are concerned that there has been a lack of joined up thinking in this section. In particular the question of rail facilities has not been addressed, but is of considerable importance to our members across the region, to the community at large, and to the whole scenario of sustainable development and minimisation of global warming.
Interest Group	
Hampton-in-Arden Society	610 It is acceptable that different "rules" should be applied to the major waste streams - municipal, and commercial and industrial. In the case of municipal waste from domestic properties, there is a case for recycling. This requires a number of different types of waste to be dealt with. Collection practice varies. A key question remains - can an authority in the MUA allocate land in its area to manage its own municipal waste? There is no simple answer because there will always be some waste that will have to go to landfill. If there is no "hole in the ground", this will not be possible. The conclusion must be that an approach, similar to that of minerals, should be adopted.
Interest Group	
Cannock Chase Area of Outstanding Natural Beauty Interest Group	733 There is still active mineral working within the area and a presumption to use these worked areas for infill would be inappropriate to the designation of the area.

Response **Response** **General Comments (Waste)**
Capacity

Campaign to
Protect Rural
England

923 We support the overall goal of waste reduction, based on best environmental practice. We also support in general the disposal of waste as close to its source as practical. However, we believe the impact of waste sites, and their scale, on the landscape and on transport need to be important factors in where facilities are located.

CPRE generally supports the goal of reducing the amount of waste that is created and the proportion land filled in accordance with the waste hierarchy and of dealing with waste as close to where it is produced as is practical, subject to environmental constraints, We support the aspiration to reduce the amount of waste being exported from the MUAs to the Shires. While we would accept that energy from waste should form part of a wider waste strategy we would be in favour of the use of smaller installations, such as anaerobic digestion, which do not require large amounts of transport. It is also clear that the higher housing option - 2 and 3 - would increase the pressure on waste facilities and, because they would lead to less sustainable land use patterns would tend to increase the transportation of waste.

Interest Group

Acocks Green
Focus Group

1061 Greater emphasis should be placed on local recycling and on using waste to create energy for local neighbourhoods. The waste strategy should then seek to minimise land fill and to spread out any waste sites equitably.

Interest Group

West Midlands
Rural
Community

1136 We believe that WMRSS does need to address agricultural waste issues including the protection of amenity and the environment.

Interest Group

West Midlands
Geodiversity
Partnership

1219 The country geology trusts and geoconservation groups have formed Geodiversity Action Plan. These GAPs will address issues of the impact of waste disposal facilities on Geodiversity especially at active and disused mineral workings and at landfill and land raising sites.

Interest Group

Response Capacity Response General Comments (Waste)

White Ladies
Aston Parish
Council

340 Waste - we endorse the desire to prevent unnecessary transportation. We also endorse the proposal to continue the reduction of aggregate consumption and transportation. However, we believe that many of the excellent proposals lack teeth. Where is the accompanying Minerals policy? We need aggregates to support this particular Revision document.

LA/Partnerships

Northamptonshire
County Council

385 The Northamptonshire county Council should support a strategic approach to waste management in the region that seeks to manage waste on a sub-regional basis and that new sites for waste facilities should be focused on urban areas where possible being built either within the urban area or as part of urban extensions.
Support for the identification of hazardous waste landfill facilities in the West Midlands region to prevent exportation of such waste to other regions

LA/Partnerships

Worcestershire
County Council

479 The Council considers the tonnages for Municipal Waste for Worcestershire set out in the revision report are incorrect.

LA/Partnerships

Stourport-On-
Severn Town
Council

632 The Council hopes that the eventual strategies will place a very clear emphasis to increase and to extend recycling, with a corresponding development of recycling facilities.

LA/Partnerships

Response Capacity Response General Comments (Waste)

Weeford Parish Council

637 The Council would like to see waste burned in an environmentally acceptable manner to provide a useful source of energy or power for the community.

LA/Partnerships

Worcestershire County Council

646 The Joint Waste Resource Management Forum felt that it is important to stress that comments made are prior to the publication of the revised National Waste Strategy, which is expected in Spring 2007. This will have a significant bearing on the future of waste management, for example the potential for introduction of "carbon targets". The County Council has recently launched a campaign to reduce junk mail. The county Council leads on most waste minimisation initiatives. Current Waste Arisings by Waste Type - Municipal Solid Waste (MSW) - 9.5% exported, should read 9.5% composted. Household Recycling Centres - 4 districts within Worcestershire have now moved to alternative week collection of residual waste. It is envisaged that all Waste Collection Authorities in Herefordshire & Worcestershire will move to alternative week collections.

LA/Partnerships

West Midlands Regional Health Partnership

664 Waste is an important consideration for the health sector. The NHS for example produces 600,000 tonnes of waste each year - over 1% of all UK domestic waste. Given that the NHS unnecessarily classifies too much of its waste as 'clinical', better segregation would help to reduce this particular output of hazardous

LA/Partnerships

Tutbury Parish Council

692 Every encouragement should be given to recycling with particular attention to the extension of facilities to enable the public to participate more fully. Landfill sites and alternative disposal facilities need to be positioned carefully to safeguard the health and amenities of the local population.

LA/Partnerships

Response Capacity Response General Comments (Waste)

Balsall Parish Council 958 Part of Balsall Common has been involved in a pilot scheme with wheelie and green bins during 2006. It is expected that this will be extended throughout the village during 2007/8. A greater variety of recycling options must be introduced to avoid reliance on land fill.

LA/Partnerships

Redditch Borough Council 1142 The Joint Waste Resource Management Forum felt that it is important to stress that comments made are prior to the publication of the revised National Waste Strategy, which is expected in spring 2007. This will have a significant bearing on the future of waste management, for example the potential for introduction of 'carbon targets'.
Local Authorities are mainly concerned with management of Municipal Waste and have limited experience in dealing with some Commercial and Industrial waste from Small Medium Enterprises (SMEs), and no experience of dealing with Agricultural waste. It is therefore difficult to comment on these waste streams due to the limited role that the LA/Partnerships has in dealing with them.

LA/Partnerships

Staffs Moorlands DC 1157 Whilst the requirement for a Site Waste Management Plan to be submitted with planning applications will provide valuable information which aims to reduce the amount of waste produced on construction sites and to prevent fly-tipping and is therefore supported by SMDC, it is considered that there would be more value in requiring details on sustainable waste management and waste disposal arrangements for schemes.

LA/Partnerships

Balsall Parish Council 1286 Part of Balsall Common has been involved in a pilot scheme with wheelie and green bins during 2006. It is expected that this will be extended throughout the village during 2007/8. A greater variety of recycling options must be introduced to avoid reliance on land fill.

LA/Partnerships

Response Capacity **Response** **General Comments (Waste)**

Labour Member of Parliament for Birmingham Selly O	35	<p>There is a need for locally based waste processing and recycling facilities, not just to meet the public demand and targets for municipal waste recycling, but also for the recycling of waste produced by local businesses.</p> <p>There is still no collection point to which people can take their waste plastics. The Birmingham City Council has attributed this to the lack of a plastics processor in Birmingham and the need to feed the Tyseley energy-from-waste incinerator. I am therefore concerned that the existence of the Tyseley energy-from-waste plant is discouraging the Council from recycling on city-wide basis or from setting up facilities that allow solutions further up the waste hierarchy. Any spare capacity at Tyseley should be sold to neighbouring districts to convert their non-recyclable or non-compostable materials (which might otherwise go into landfill) into energy. Clearly there needs to be much improved coordination at a regional level with regard to waste.</p>
Other - please specify		
Government Office for the West Midlands	587	<p>A review of England's Waste Strategy and publication of this document is anticipated shortly. This will set targets for diversion of waste from landfill and we consider it appropriate that you have reflected the proposals for these targets under Option 2 in respect of Commercial and Industrial waste. In view of the publication of this strategy and the KPO of PPS10, it would be inappropriate to pursue Option 1 (based upon the existing national waste strategy) as you develop your policies.</p> <p>You are undertaking further research to identify the need for facilities of sub-regional or regional significance and that if identified you will incorporate this at the 'Preferred Option' stage. We welcome this additional research, but given their absence from the consultation at this stage it is important that in selecting broad locations there is appropriate engagement with key stakeholders.</p>
Other - please specify		
Advantage West Midlands	848	<p>The Spatial Options need to recognise that the West Midlands has some waste management- related advantages over other regions:</p> <ul style="list-style-type: none"> - transport network; - highly developed recycling facilities; - Environmental Technologies Cluster opportunities; - business engagement can also contribute to solving waste problems.
Other - please specify		

Response Capacity Response General Comments (Waste)

Severn Trent Water Ltd 964 It is disappointing that the proposed strategies around dealing with increased waste do not include consideration of how future waste water should be dealt with. With regard to wiser use of natural resources and in particular renewable electricity targets from biomass sources, recognition should be given to the opportunity to generate energy from waste. LDD and waste development frameworks should recognise this opportunity and provide positive policies to assist in capturing this potential. However, they would also need to recognise that the use of such technology would potentially involve transporting fuel to the power station from outside of the local area.

Professional

Health Protection Agency 974 Waste disposal can be a major generator of road transport, noise and dust with potential adverse effects on safety and air quality. Contaminants such as polycyclic aromatic hydrocarbons (PAHs), heavy metals, oil, asbestos and landfill gases are injurious to health.

Professional

The Kenilworth Society 1165 With regard to domestic waste, Strategy is based on forecasts of household numbers. However the amount of domestic waste generated will depend on the number of people in the region. A family of four living in one house will produce almost four times the rubbish.

Professional

Severn Trent Water 1249 It is disappointing that the proposed strategies around dealing with increased waste do not include consideration of how future waste water should be dealt with. With regard to wiser use of natural resources and in particular renewable electricity targets from biomass sources, recognition should be given to the opportunity to generate energy from waste (e.g.. Using sludge as fuel).

Professional

Response **Response** **General Comments (Waste)**
Capacity

29 Waste is an urgent and vital issue. There is far too much landfill and incineration that is adding to CO2 emissions, global warming and climate change problems. We need far more sustainable recycling , far less packaging, far less you of plastic. The whole of the West Midlands urgently needs separated waste (glass, cans, paper, kitchen waste, garden waste, plastic) at the kerbside for all residential areas. Sustainable recycling plants should be developed

Resident

63 I have already sent an email to M Foster, our M.P. on the suggestion that a Waste Disposal Unit should be placed in Warndon.

Resident

217 Again these facilities are in short supply, would more of these be in place PRIOR to the building of the houses?

Resident

284 The recycling of household waste has improved this aspect of waste disposal but more could be done to recycle plastics.

Resident

Balsall Common
Village
Residents
Association

321 Part of Balsall Common has been involved in a pilot scheme with wheelie bins during 2006. It is expected that this will be extended throughout the village during 2007/8. A greater variety of recycling options should be introduced to avoid reliance on land fill.

Resident

Response Capacity **Response** **General Comments (Waste)**

391 Encourage the building of Energy from Waste Plants, as well as nuclear plants and wind farms. We are already far too dependent on imported fuel. Such plants are cleaner than the alternatives, if a little more expensive in the short term. Can the UK really allow itself to be dependant of Russia & Eastern Europe for its gas and oil supply? At a local level the recycling of waste in Solihull, based on the emptying of our garden waste and regular use of the Bickenhill Waste site is a joke. No wonder the Authority is way down the list of recyclers in the UK. Birmingham is marginally better, but only because it had the foresight to have had an EFW Plant in Tyseley for the past fifty (?) years. Recycling works in many other countries, why not here?

Resident

528 I consider that the method of collecting waste for re-use/recycling should be far more standardised across the Region and not just left to the whims of individual WDAs. Also should not WDAs be required to work together and use technology that is more economical at a larger scale, so that there may only be a need for fewer facilities rather than leaving it to individual WDAs to decide for themselves what to do?

Resident

567 The design of any new housing should include grey water storage, fed from roofs and hard surfaces. Storm water should not be permitted into the foul sewer. The grey water is to be used for flushing toilets, watering of gardens and for the washing of cars. No external potable water is to be supplied to any external tap. Food disposal units should be fitted as standard to every dwelling.

The West Midlands should neither import nor export for disposal any of its domestic, white goods or industrial waste. Disposal within the West Midlands should be the policy, except where alternatives close to the WM borders, make overlap with other areas expedient. Land fill disposal should be rapidly phased out in favour of incineration that uses the heat generated to produce electricity. Schemes that adopt the autoclave method, thereby totally wasting the heat generated should be roundly discouraged.

The additional sewage provision should be constructed so as to maximise bio-digestion. The methane so developed should be regarded as a fuel and utilised to generate electricity. Yet another method of having waste contribute value to the community.

Resident

Response Capacity Response General Comments (Waste)

605 Each authority should manage its waste in accordance with the waste hierarchy. Dealing with waste makes us all aware of the problems, not only of domestic waste but also of industrial waste and re-use of all kinds of materials. One issue common to this subject and to housing is the question of transport and the infrastructure, which does not appear to have been thoroughly considered. Location of sited will be problems in the future that will be

Resident

606 It is common knowledge that the sewers in Worcester are unable to cope with water after torrential storms, causing flooding, damage and upheaval to residents and their property, as well as a hazard to health with raw sewage entering the streets. This is in addition to the annual flooding of the River Severn.

Resident

743 Waste on page 5 states that most of the regions waste comes from construction and demolition plus municipal, commercial, industrial and agricultural sources. Yet the gist of the piece is where to site waste management facilities for the disposal of household waste. There is no mention about solving the problems of the major waste producers.

Resident

1019 Whilst the matter is quite comprehensively reviewed by Phase 2, there is the omission of sewerage. It should also be mentioned in this section that as a result of some land use, a natural resource, water form rainfall, becomes a 'waste' that needs to be disposed of. The treatment of rainfall; there can be measures for capture and use of rainfall and such an overall policy needs to appear somewhere in

Resident

***Response
Capacity*** ***Response*** ***General Comments (Waste)***

1077 More housing inevitably raises the amount of waste to be recycled or dealt with in an appropriate manner. Proper resources need to be in place beforehand in order to adequately address this issue.

Resident