

Warwickshire County Council

**Minerals and Waste Local Development
Framework**

**Pre-submission consultation statement
(Regulation 27)**

March 2012

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1.0 Introduction

1.1 Purpose of the report

Regulation 25 prescribe the need for early engagement of certain bodies as well as the local community and businesses in the preparation of Development Plan Documents (DPD's) before the document reaches Publication Stage.

This statement details the participation and consultation activities undertaken in respect of the production of Warwickshire County Council's Waste Development Framework (WDF) Core Strategy Development Plan Document (DPD). It is prepared under Regulation 27 (b) (i) of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2009, which requires the submission of a DPD to be accompanied by a statement setting out:

- *Which bodies and persons the local planning authority invited to make representations under Regulation 25,*
- *How those bodies were invited to make such representations,*
- *A summary of the main issues raised by those representations, and*
- *How those main issues have been addressed in the DPD*

1.2 Stages of plan preparation

The Waste Core Strategy of the Waste Development Framework is a Development Plan Document which sets out the Spatial Strategy, Vision, Objectives and Policies for managing waste for a 15 year plan period up to 2027/2028. It also provides the framework for waste development management including implementation and monitoring. Prior to the production of the final plan, the strategy has to develop through a number of different stages and enable full consultation and opportunities for stakeholders to comment and influence the plan. The stages of consultation have all contributed to the production of the Waste Core Strategy Development Plan Document.

Work commenced on the Core Strategy of the Waste Development Framework in July 2005, and consultation on Issues and Options took place in February 2006 and on the Preferred Option in August 2006. The Core Strategy was due to be submitted to the Secretary of State for examination in January 2007. At the time the Core Strategy was due to be submitted, the plan preparation process was in a state of uncertainty as to the way forward following the first two Core Strategies being found unsound by an independent Inspector.

Communities and Local Government (CLG) then wrote to all authorities anticipating that their Local Development Schemes would need revision in light of new government guidance and the publication of the 'Barker Report'. Following that advice and the need to undertake a Strategic Flood Risk Assessment (SFRA), Warwickshire County Council felt it would be

inappropriate to progress its Waste Core Strategy to the Submission stage and concluded that it needed to return to the Options stage (i.e. two stages back in the process) instead of moving forward to submission as previously planned. Since 2008 there have been further delays with the uncertainty over the future of the Energy from Waste plant in Coventry, a joint PFI project between Warwickshire, Solihull and Coventry. This was central to the delivery of the Municipal Waste Strategy and the continuation of the project had major implications as to where new waste sites could be located in the county.

In addition to the consultation on the key waste issues, the spatial options to deliver the waste strategy needed to be considered in sufficient detail to demonstrate that the final locational strategy represented the best way forward. Therefore, the Council needed to return to the Options stage to consider alternative options to demonstrate that the most appropriate strategy would be taken forward and the decision making was founded on a robust and credible evidence base. As a consequence of these events, Warwickshire County Council developed five spatial options to decide where future waste management facilities should be located in the County. These options were consulted on as part of the Emerging Spatial Options consultation, which took place between March 2011 and May 2011.

Following analysis of the responses and having tested the five options through a Sustainability Appraisal, Option 5 was taken forward and formed the basis of the consultation on the preferred locational strategy.

The timetable below outlines the stages of consultation in the production of the Waste Development Framework Core Strategy Development Plan Document. Each representation received during the 6 week consultation period was considered by Warwickshire County Council. The comments received were then used to help inform and influence the next stage of the Waste Core Strategy.

- March 2011 – Emerging Spatial Options consultation
- September 2011 – Preferred Option and Policies consultation
- March 2012 – Publication consultation
- Spring 2012 – Submission
- 14 weeks after submission – Examination in Public
- Adoption – expected Spring 2013

1.3 Statement of Community Involvement (SCI) and consultees

As well as consulting those bodies that are listed in PPS 12, (Appendix F) the council has also sought to engage with the wider community. The Statement of Community Involvement (SCI) is a Development Plan Document that sets out how and when consultees will be involved in the development plan making process. This was adopted by the council's Cabinet in June 2005.

To encourage early involvement the document highlights the particular stages in which public participation is sought. The document also sets out a range of consultation techniques to be used throughout the process which is adapted

to ensure that appropriate methods are used depending on the stage of the plan. The methods of engagement as set out in the SCI are shown below.

Table 1.0: Methods of Engagement

Method of Involvement	Statutory	Non-Statutory
To view documents at offices	✓	
To view documents at libraries	✓	
Publish documents on the County Council's web-site	✓	
Direct letters to statutory bodies	✓	✓
Advertisement in local press	✓	
Leaflets		✓
Public Exhibition/Roadshows		✓
Formal written consultation	✓	
Citizen's Panel		✓
Forums		✓
Workshops		✓
Focus Groups		✓

Source: Minerals and Waste Planning Statement Community Involvement (2005)

All stakeholders who responded to the various stages of the Waste Core Strategy consultation exercises have been added to the consultation list as the process has developed. This means that everyone that has responded previously has then been consulted with at the next stage of the process and continually engaged with throughout the process. If information was provided, any amendments to contact details were made in between the various stages of consultation to ensure that the correct information was used. New consultees were also added as and when the requests were made. Appendix D shows the full list of consultees that were consulted with throughout the Waste Core Strategy process and contains the most up to date information.

2.0 Preliminary Consultation

Consultation at the preliminary stage sought a wide range of opinions. A questionnaire was approved for consultation by Cabinet. It was published on 14th July 2005 and made available for comment over the following six week period. The consultation was advertised in the following newspapers; Stratford Herald, Nuneaton and Bedworth Weekly Tribune, Rugby Advertiser and the Tamworth Herald on 21st July 2005 and the Leamington Courier on 22nd July 2005 (See Appendix A). The questionnaire was sent to individuals and organisations directly on the mailing list and made available for completion on the website. Copies of the questionnaires were also made available in County and District Council offices and all County libraries.

3.0 Issues and Options Consultation

An Issues and Options paper, including a Sustainability Appraisal of the options and questionnaire, was approved for consultation by a meeting of Cabinet on 2nd February 2006. It was published on 27th February 2006, and made available for comment until 10th April 2006.

During this period 1400 individuals or organisations were directly consulted on the document or informed of its availability. This included all Parish Councils within and adjoining the County and groups involved in Local Strategy Partnerships. The document and associated questionnaire were also made available in County Council receptions at Barrack Street and Shire Hall, Warwick and 5 District Council Planning Receptions and all County libraries. They were also available on the Council's website, with the option of completing the questionnaire online.

3.1 Publicity

A public notice was placed in the Heartland Evening News, Stratford Herald and Tamworth Herald on 23rd February 2006 and the Warwick Courier, Rugby Advertiser, Leamington Courier on 24th February 2006 (See Appendix A). In addition to this, the consultation was publicised by displays in the main libraries and exhibitions took place at Nuneaton library, Stratford-on-Avon District reception, Atherstone library, Warwick District Council reception and Rugby library.

A short section about the Waste Core Strategy was included in the Departments Annual Review Publication 2005 which was distributed to all elected members County Council Officers, all Parish Councils in the County, all district and unitary councils in the sub-region, Arup, Mowlem and Carillion, Coventry and Warwickshire Chamber, GOWM, AWM, Highways Agency, and made available at all County Council Receptions and Libraries and on the Council's website.

All members of County and District Councils were informed of the consultation by email and an article was included in Inform (Warwickshire County Council's Members' Magazine) raising awareness of the consultation and outlining the process so far.

3.2 Stakeholder workshop

A public consultation workshop was held on 18th March 2006 at Manor Hall, Leamington Spa between 10.00 – 15.00. Twenty-eight individuals attended. The event, which was jointly facilitated by Warwickshire County Council and Arup Consultants began with a short introduction to the purpose of the workshop and DPD consultation, followed by a presentation on the background to waste planning in Warwickshire and the Issues and Options paper. Attendees were divided into two groups to discuss the issues, this discussion was then fed back to the group as a whole. A summary was published on the council's website.

Posters were distributed to each library and flyers sent to each Parish Council as well as Nuneaton and Bedworth Environment sub-group of the Local Strategic Partnership, Warwickshire Wildlife Trust and Waste and Resource Action Programme. Flyers were also sent to district and county council receptions for distribution.

A press release was sent to newspapers across the county and the event was publicised on Warwickshire's website and online events database. All County, District and Borough Councillors were informed.

3.3 Waste Development Forum

A Waste Development Forum was created to guide the production of the Waste Development Framework. A range of stakeholders were invited to become part of the forum. The list was put together based on Officer's knowledge of the industry and those who would be most appropriate to attend. A number of meetings took place. They were held on 15th February 2007 and 17th March 2007 at Manor Hall in Leamington Spa and on the 5th April 2007 at Eliot Park Innovation Centre, Nuneaton. Over the course of these three events, all attendees had the opportunity to discuss all of the issues and options within the paper.

At the first meeting, waste planning in Warwickshire was introduced and the National Industrial Symbiosis Programme (NISP) made a presentation outlining the UK context. The terms of reference for the group, although guided by WCC were created by the forum group at this meeting and the following objectives were commonly agreed upon.

- Assist the council to create a deliverable and flexible Waste Development Framework
- Ensure the Forum is representative
- Ensure democratic process within the Forum
- Be an informed group
- Ensure all issues and options are considered and evaluated in detail; and promote public education of the issues

In the following two forum meetings the issues to be discussed were introduced and the forum was split into smaller groups to discuss these, before reconvening as a group to feed back a summary of the discussion. The discussion was facilitated jointly by Arup and WCC. Key points were recorded

and made available on the councils website. Over the course of the three meetings 28 organisations participated in the Waste Development Forum, with forum members representing a broad range of interests and 34 individual representations were received.

3.4 Education and Awareness Raising

A set of educational information cards were produced to give some background information on waste types and treatment techniques, in order to help make the content of the paper more accessible to a wide range of consultees. These were distributed with the Issues and Options paper and made available at libraries, council offices and other organised events. The information was also available on the council's website. Several events were also held.

3.5 Information Roadshow

A public information event was held at 18.30 on 24th January 2006 at The Benn Hall, Rugby. It consisted of a presentation on the issues affecting waste planning in Warwickshire, given by the Councils Principal Waste Management Advisor and a presentation given by Environmental Services Association giving an industry perspective. It also provided an opportunity for stakeholders to ask questions and find out how to become involved. This was not a consultation event but responses to the questions raised were posted on the council's website.

A media release was sent to local radio and papers to publicise the event. In addition to mailshots being sent to the existing mailing list, dedicated mailshots were sent through Sustainable Rugby, Action 21, members of the Furniture Recycling Forum, Warwickshire Environmental Trust, The Local Biodiversity Partnership Nuneaton and Bedworth CVS and Rugby CVS to over 200 members, an exhibition stand was set up in libraries and district council offices.

A public information roadshow was held on 31st March 2006 at Newtown Centre, Nuneaton. The aim of this roadshow was to outline the DPD process and the purpose of this consultation. There was an opportunity for the public to ask questions but consultation responses were not made at this event. Copies of the relevant documents were made available and a record was made of all those who wished to be involved in future consultation stages.

3.6 Council for Voluntary Services (CVS)

With the aim of securing a community audience and to involve the voluntary sector within the county at an early stage the five CVS offices within the county were approached. There was an opportunity to give presentations at existing meetings in Stratford and Atherstone Action Forum. These opportunities were used to promote the Waste Core Strategy and it was hoped they would disseminate information to other interested parties. Answers to the questions raised were made available on the council's website for other stakeholders to view.

3.7 Planning Aid

All public events promoted the free training offered to community groups by Planning Aid. Planning Aid literature was provided at the events and a record of those interested in training was recorded. Planning Aid also attended the Stakeholder workshop to offer independent guidance and support.

3.8 Summary of responses

A total of 99 responses were received to the questionnaire accompanying the issues and options paper, which is a response rate of approximately 7%. The main issues raised during the consultation were as follows:

- The plan needs to be more proactive
- The plan needs to be deliverable
- The plan should promote the movement of waste management practices up the waste hierarchy
- Hazardous waste requires a regional rather than just countywide solution
- Policy should allow a broad range of technologies
- Policies should not be technology specific
- Location should be technology specific to respond to different needs and effects of the amenity
- The concept of the “proximity principle” needed clarifying if not updating to reflect PPS10
- Incineration would need to be suitable located and well monitored

4.0 Preferred Options Consultation (Regulation 26/27)

The revised MWDS (November 2005) identified that consultation on the Preferred Options paper should take place in August 2006.

The Preferred Options and Proposals were approved by Cabinet on the 13th July 2006, and published for consultation on 30th August until the 11th October 2006. As with the Issues and Options, this involved publicity of the statutory consultation in local newspapers, together with sending out the document and questionnaire to over 1100 contacts from our mailing list. The document and questionnaire were also made available at all of the Warwickshire libraries, the 5 District Council Planning receptions and our reception at Barrack Street, Warwick. It was also on the Warwickshire County Council website and the questionnaire was available to submit on-line.

The consultation was also advertised on the Council’s homepage and the Environment and Planning section homepage. In addition it was publicised on the Corporate Events database, which is a publicly accessible database of events happening across the County.

4.1 Publicity

A public notice (See Appendix A) was placed in the following papers in the week beginning 4th September 2006:

- Bedworth Echo

- Heartland Evening News
- Rugby Advertiser
- Stratford Herald
- Warwick Courier

A press release (See Appendix B) was also sent out on 8th September 2006.

50 responses were received during the consultation period. These were considered and taken account of, where appropriate.

4.2 Waste Development Forum

The Waste Development Forum met once during the formulation of the Preferred Options paper to discuss the emerging issues. This was done in part through the use of the secure web forum.

The group met again on 26th September 2006 following the publication of the Preferred Options paper. A total of 14 representatives attended this event. It included a short presentation from the Planning Policy manager about the current stage in the DPD process and the Councils Principal Waste Management Advisor about the current issues. This was followed by discussion in two break-out groups regarding the Policy Principles and key issues. Discussion tended to focus on key issues 6 and 7 and Policy Principles 1-4. A summary of the discussion has been made available on both the council's website and the Secure web forum.

4.3 Stakeholder Workshop

A public consultation workshop was held on the 7th October 2006, this followed a similar format to the Waste Development Forum meeting but with the intention of engaging stakeholders who were unable to attend the day time forum meetings. It was publicised on posters in all County libraries and large displays in the libraries outlined above. Details were also included in the press release and public notices placed in local papers and flyers distributed at the Town and Country Festival on 18th August 2006. All of those who were sent the Issues and Options paper directly were also informed of this event.

Three people attended. Following the two short presentations, a discussion took place. A summary of this discussion was also made available on the Council's website and secure web forum.

4.4 Education and Awareness Raising

Posters were distributed to all main libraries and there were large displays and 'Drop-in' sessions at Atherstone, Nuneaton, Rugby, Stratford, Warwick and Kenilworth libraries. During the 'Drop-in' sessions a planner was available assist with any questions or queries. The sessions were held on the following dates; Atherstone: 5th September, Nuneaton: 8th September, Rugby: 19th September, Stratford-upon-Avon: 25th September, Warwick: 28th September and Kenilworth: 10th October.

5.0 Recommencing the Waste Core Strategy: Emerging Spatial Options

Although the waste key issues had already been consulted on, the spatial options to deliver the waste strategy needed to be considered in sufficient detail to demonstrate that the final locational strategy represented the best way forward. This consultation was to look at the five spatial options in more detail. The consultation took place between **21st March 2011** until **20th May 2011**.

5.1 Publicity

A statutory public notice was placed in a selection of newspapers around the county to ensure that every part of the county was covered (See Appendix A). A copy was placed in the following newspapers:

Nuneaton Tribune: 17th March 2011
Tamworth Herald: 17th March 2011
Rugby Advertiser: 17th March 2011
Stratford Herald: 17th March 2011
Warwick Courier: 18th March 2011
Nuneaton News: 17th March 2011

5.2 Libraries and Reception Points

Copies of the document were available in each of the District/Borough Council reception areas and all libraries throughout Warwickshire were given documents to display. The number of documents that they were given was dependent on the size of the library. All of the larger libraries which are classed as 'Band A & B' were given 10 copies of the document and questionnaires, with Band C & Band D libraries receiving 5 copies each. All of the reception points which included, Warwick District Council, Stratford-on-Avon District Council, North Warwickshire Borough, Nuneaton & Bedworth Borough, Rugby Borough Council and Shire Hall, Warwick all received 5 copies of the document and questionnaire.

Display boards were put up in a selection of libraries throughout the county again ensuring that each part of the county was covered. The details of these displays are as shown below and a Planning Officer was also present at the libraries for an afternoon session to answer questions that may have arisen during the consultation.

5.3 Drop In Sessions (Emerging Spatial Options)

<i>Drop-in Sessions</i>	<i>Date</i>	<i>Time</i>
Stratford Library	28 th March 2011	12.00-5.30pm
Warwick Library	7 th April 2011	12.00-6.00pm
Rugby Library	20 th April 2011	12.00-5.00pm
Nuneaton Library	4 th May 2011	12.00-6.00pm
Atherstone Library	9 th May 2011	12.00-6.00pm

5.4 Exhibition/display stands (Emerging Spatial Options)

<i>Exhibition/display boards</i>	
Alcester Library	21 st – 24 th March 2011
Stratford Library	25 th – 28 th March 2011
Shipston Library	29 th – 31 st March 2011
Southam Library	1 st – 3 rd April 2011
Warwick Library	4 th – 7 th April 2011
Leamington Library	8 th – 10 th April 2011
Kenilworth Library	11 th – 14 th April 2011
Bulkington Library	15 th – 18 th April 2011
Rugby Library	19 th – 27 th April 2011
Bedworth Library	28 th April – 3 rd May 2011
Nuneaton Library	4 th May – 8 th May 2011
Atherstone Library	9 th – 12 th May 2011

5.5 Forum Event (May 2011)

An event took place at Northgate House Conference Centre on Friday 6th May 2011 at 10.00am. The main focus of the event was to have a discussion around the five spatial options that had been put forward, however there was also an opportunity to look at the current position/context of the Waste Core Strategy and the treatment gap and 'strategic sites'. All of the comments were noted at the event and taken forward to help contribute to the next stage of the Waste Core Strategy: Preferred Option and Policies consultation. The event was open to all members of the Waste Forum.

5.6 Press release

A press release was drafted and sent to the press office at Warwickshire County Council. A copy of this can be found in Appendix B . The press release was sent out to all of the papers throughout each area of the County.

5.7 Letters and copies of the document

A letter and a copy of the consultation document together with a questionnaire was sent out to all statutory consultees. A decision was taken to then send a CD and letter to 'other' consultees and 'general' consultees and finally a letter was sent out to all 'waste general' consultees directing them to the document available on the website (See Appendix C). A copy of all of the consultees can be found in Appendix D .

5.8 Warwickshire County Council website

The consultation was published on the Warwickshire County Council website throughout the whole of the consultation period. A copy of the link to the website was included on the letters sent out to everyone, all press releases, statutory press notices and in the consultation documents.

5.9 Summary of responses to Emerging Spatial Options consultation

Whilst consultation took place on the Emerging Spatial Options between 21st March and 20th May 2011, comments submitted up to the 15th June 2011 were accepted. In total, 67 responses were received; 1 by email, 15 by web and 51 by questionnaire or letter. WCC considered all of the comments received and the comments recorded from the Waste Forum and library drop in sessions

and these were incorporated where necessary. These comments then contributed towards the Preferred Option which went out for consultation in September 2011.

The following section of the report is intended to provide a brief snapshot of the comments received at this stage of consultation. A full list of all of the responses received to this consultation can be found in Appendix E of the document.

5.91 The Vision

Overall 64% of respondents agreed with the vision. There were a couple of responses suggesting that there should be a target or a percentage for minimising waste. In addition to this there were also comments regarding a greater emphasis to be placed on 'reducing landfill and incineration'.

5.92 Key Objectives

There were comments suggesting that specific targets were included and set and that there should be a greater emphasis on access roads. In addition to these comments there were a number of requests to remove reference to European guidance from Objective 1, reference should be made to sustainability and there should be an additional objective around the need for aerodrome safeguarding.

5.93 Key Issues

There didn't appear to be any great areas of concern and there was significant support for the key issues with 75% of respondents in agreement.

5.94 Any Other key issues

There were a number of comments that were fairly specific and these can be viewed in Appendix 5. One of the issues that was raised a number of times was the need to ensure that if using the proximity principle for the siting of new waste facilities this should not be at the expense of damaging the environment and biodiversity. It was also considered necessary to ensure that aerodrome safety is considered and that aircraft is protected from bird strike.

5.95 Policy Principle 1

Most of the comments received were strongly in support of the principle that waste is managed as close as is possible to where it arises in line with the principles of proximity and self sufficiency. The main recommendations were to ensure that there is more clarity on what is meant by sustainable transport systems and also to restore mineral workings to positive after uses.

5.96 Policy Principle 2

There were a number of concerns with this principle, one being that the spatial options proposed did not include a mineral workings restoration and the other being that the Policy Principle is more of a statement future action rather than a Policy Principle. Other observations included more awareness around the closeness to Worcestershire of waste facilities.

5.97 Policy Principle 3

It was felt that this Policy Principle should include those sites that do not come forward for development that would significantly impede implementation of the plan. Comments also mentioned the need to ensure that consideration is given to the overall impact of CO2 and reference should be made to rail heads and whether these should be considered for waste transfer stations. There was also concern that the Policy Principle actually limits the provision of waste management sites rather than promotes them, and that more promotion was needed for using sustainable modes of travel.

5.98 Policy Principle 4

There appeared to be a reoccurring theme around the need to ensure there is constant monitoring of the capacity. It was suggested that reference should be made to the Annual Monitoring Report (AMR) which will help to assist in identifying the treatment gap. Further, it was suggested that the following words are added 'in accordance with the principles of proximity, self-sufficiency and the waste hierarchy' after the word 'capacity'.

5.99 Policy Principle 5

Most of the responses received were in support of this Policy Principle and the need to divert waste away from landfill and encourage the re-use and recycling of materials. However, there were a number of responses which suggested that there should be a mention of the need to educate people about the importance of recycling. A request was made to insert the word 'proximity' before self sufficiency.

5.910 Policy Principle 6

A number of comments here reiterated the need to reuse and recycle waste as a priority with less waste being sent to landfill. In addition, consideration should be given to the role that 'recovery' and renewable energy generation plays in not only providing facilities to meet the treatment gap but also in providing a source of renewable energy. This will be important to facilitate the delivery of the government's commitments on climate change and as detailed in the Waste Hierarchy. There were also suggestions that a carbon specific target should be included and there should be a greater emphasis on the need to reduce C&I waste going to landfill and incineration.

5.911 Policy Principle 7

The majority of respondents agreed with this policy. There were concerns over the word 'encourage' in relation to site waste management plans and that this should in fact be mandatory. There were comments around the need to ensure that C&D waste is treated as close as to where it arises and the question was asked as to why Warwickshire imports more waste than it produces. There should be opportunities for re-using waste for energy production which does not appear to be explicitly mentioned and also it was suggested that more guidance and support on what to do with inert waste once it has been treated should be provided.

5.912 Policy Principle 8

There were a number of concerns over the fact that Warwickshire imports Hazardous Waste which is then transferred or sent to landfill. However, there was an agreement that it is more practical to treat and stabilise Hazardous waste at larger specialised facilities. There was also a suggestion that hazardous waste should be treated in relation to its proximity to its arisings.

5.913 Policy Principle 9

The majority of responses agreed with this policy principle. There appeared to be a strong emphasis on the need to ensure that close checks on medical facilities producing syringes etc are included in this policy and that any sites to treat this waste should be located well away from residential areas. There were also comments requesting the consideration of mining and where this fits in, opportunities of reusing waste for energy generation and the consideration of low-level radioactive waste.

5.914 Policy Principle 10

Most of the comments received were in support of this principle, although one suggestion was that the principle should be deleted completely. Most of the comments appeared to be around defining and clarifying how this principle can be achieved and what is meant by non-waste development. There should be a need to ensure that the right type of facilities that are already in the correct places are safeguarded.

5.915 Policy Principle 11

There was concern over the accuracy of the data used. There were numerous comments regarding the need to restore landfill sites to wildlife/country parks and the landfilling of waste to restore mineral workings to a beneficial afteruse. There was a request to define 'environmentally acceptable' and what is meant by this and also for the following text to be added after the word 'acceptable' "and in accordance with the principles of proximity, self-sufficiency and the waste hierarchy".

5.916 Policy Principle 12

The policy is in line with the Countryside and Rights of Way Act 2000 (CROW) and PPS 7 with respect to designated landscapes. There were suggestions that checking and monitoring should be included and also that there is a suitable gap between homes and schools and waste facilities. It was also pointed out that the highest possible standard may not necessarily represent the most sustainable solution.

5.917 Policy Principle 13

There were very few comments around this principle. The only issues to be considered are that of continual monitoring. Environmental indicators for the natural environment should also be included.

5.918 Spatial Options

There were a total of 52 comments received for this question. The option that appeared to be the favourite was option 5, however there were also a significant number of responses which did not state a preference and made

general comments. All of these comments can be viewed in Appendix E. The second part of the question was whether there were any other spatial options that should be considered. Some of the comments received include the assessment of the actual tonnages of waste materials, to maximise CO2 reductions and help waste to be used to restore mineral workings.

5.919 Summary

All of the comments received during this consultation were considered and where necessary the changes were made. A copy of the officer response to each representation made can be found in Appendix E.

6.0 Preferred Option Consultation

Consultation took place between 26th September 2011 – 18th November 2011. The main aim of this consultation was to consult on the Preferred Option of the Waste Core Strategy together with the draft Core Strategy Policies and the draft Development Management Policies.

6.1 Publicity

A statutory press notice (See Appendix A) was placed in a selection of newspapers throughout the county to ensure that every part of the county was covered. The press notices were published in the following newspapers on the following dates:

Rugby Advertiser:	22 September 2011
Tamworth Herald:	22 September 2011
Nuneaton News:	22 September 2011
Nuneaton Tribune:	22 September 2011
Leamington Courier:	23 September 2011
Stratford Herald:	22 September 2011

6.2 Libraries and Reception Points

Copies of the document were available in each of the District/Borough Council reception areas and all libraries throughout Warwickshire were given documents to display. The number of documents that they were given was dependant on the size of the library. All of the larger libraries which are classed as 'Band A & B' were given 10 copies of the document and questionnaires, with Band C & Band D libraries receiving 5 copies each. All of the reception points which included, Warwick District Council, Stratford-on-Avon District Council, North Warwickshire Borough, Nuneaton & Bedworth Borough, Rugby Borough Council and Shire Hall, Warwick all received 5 copies of the document and questionnaire.

Display boards were put up in a selection of libraries throughout the county, again ensuring that each part of the county was covered. The details of these displays are as shown below and a Planning Officer was also present at the libraries for an afternoon session to answer questions arising during the consultation.

6.3 Drop In Sessions (Preferred Option and Policies)

Drop-in Sessions	Date	Time
Stratford Library	29 th September 2011	12.00pm
Warwick Library	11 th October 2011	12.00pm
Rugby Library	20 th October 2011	12.00pm
Nuneaton Library	28 th October 2011	12.00pm
Atherstone Library	1 st November 2011	12.00pm

6.4 Exhibition /display stands (Preferred Option and Policies)

Exhibition/display boards	
Alcester Library	26 th – 27 th September 2011
Stratford Library	28 th – 30 th September 2011
Southam Library	1 st – 3 rd October 2011
Wellesbourne Library	4 th – 5 th October 2011
Leamington Library	6 th – 9 th October 2011
Warwick Library	10 th – 12 th October 2011
Kenilworth Library	13 th – 16 th October 2011
Bulkington Library	17 th – 18 th October 2011
Rugby Library	19 th – 24 th October 2011
Bedworth Library	25 th – 27 th October 2011
Nuneaton Library	28 th – 30 th October 2011
Atherstone Library	31 st October – 2 nd November 2011
Coleshill Library	3 rd – 4 th November 2011
Polesworth Library	5 th – 7 th November 2011

6.5 Forum Event (November 2011)

An event took place at Barrack Street Council offices on Wednesday 30th November 2011 at 10.00am. The Waste Development Framework Forum was open to invited stakeholders on the membership database. The main focus of the event was to provide attendees with progress to date in producing the Waste Core Strategy and they were asked to participate in a discussion on the Preferred Spatial Option as well as the key issues raised as part of the consultation.

6.6 Press Release

A press release was drafted and sent to the press office at Warwickshire County Council. A copy of this can be found in Appendix B. The press release was sent out to all newspapers throughout each area of the County.

6.7 Letters and copies of the document

A letter and a copy of the consultation document together with a questionnaire was sent out to all statutory consultees. A decision was taken to then send a CD and letter to 'other' consultees and 'general' consultees and finally a letter was sent out to all 'waste general' consultees directing them to the document available on the website. A copy of the consultees on the mailing list can be seen in Appendix D.

6.8 Warwickshire County Council website

The consultation was published on the Warwickshire County Council website throughout the whole of the consultation period. A copy of the link to the website was included on the letters sent out to everyone, all press releases, statutory press notices and in the consultation documents.

6.9 Summary of responses – Preferred Option and Policies

This section of the report is intended to provide a snapshot of the comments that were received during this stage of the consultation. A full copy of the detailed comments will be available as an appendix at the back of this report (See Appendix E).

The total number of responses received either by questionnaire or letter, email or by using the electronic database, Objective was 55. All of the responses were considered together with the comments recorded from the Waste Forum and library drop in sessions and were incorporated where necessary. They have contributed towards finalising the plan (publication stage) which is due to be consulted on in March 2012 for an 8 week consultation period.

6.91 The Vision – Question 1

A total of 30 people responded to this question. In total 84% of the responses received agreed with the vision and only 13% of people disagreed. 3% of respondents made observations and did neither agree or disagree. There were very few comments received, however those that were made, made reference to the vision being too long and too aspirational, very verbose and over elaborate and finally that there should be reference to communicating with industry, land owners and local communities.

6.92 Key Objectives – Question 2

The majority of respondents agreed with the key objectives. A total of 30 responses were received. One of the comments welcomed the wording that had been included, making reference to “enhancing and conserving the natural, built, cultural and historic environment”. Further it was suggested that there should be a clearer connection between waste reduction and the need to minimise the use of natural resources. There was also concern that reference to climate change had been removed since the last consultation (Emerging Spatial Options) but that the rationale for this was not clear. It was suggested that Anaerobic Digestion be included and also that aerodrome safeguarding is referenced.

6.93 Core Strategy Policy 1 – Waste Management Capacity

The majority of respondents, 77% agreed with the Core Strategy Policy 1 and there were approximately 8% who did not agree with the remainder (15%) unsure. One of the main comments received were in relation to the arisings data and figures. It was suggested that the policy should be based on **actual** waste arisings as the RSS tonnages and percentages were no longer accurate. There was also some uncertainty over using previously developed land especially agricultural and forestry land.

6.94 Core Strategy Policy 2 – The Spatial Waste Planning Strategy for Warwickshire

Although the majority of respondents agreed with this policy, there were also a number of respondents who were unsure (28%). Only 10% of respondents did not agree with it. There was a request that the policy should make greater reference to the protection of the natural environment if the vision is to be realised and also there should be reference to the “historic environment”. Another recommendation was to include non-statutory sites as a constraint to new waste development within the broad spatial approach. Finally, Materials Recovery Facilities (MRF’s) should be considered suitable for land allocated for or in use as B2 use.

6.95 Core Strategy Policy 3 – Strategy for locating large scale waste sites (proposals seeking to handle over 50,000 tonnes of waste per annum)

A total of 28 responses were received. 61% of the respondents agreed with the policy, 25% disagreed and only 14% were unsure. The main issue arising with this policy with several respondents having made reference to it was that if the policy and emphasis is on reducing waste, there should not be a requirement or need for any new waste sites. Large facilities should only be located in the county if it can be demonstrated that the need for the waste stream can’t be met by a smaller facility.

6.96 Core Strategy Policy 4 – Strategy for locating small scale waste sites (those of less than 50,000 tpa)

This policy was supported by 69% of respondents, only 8% of respondents did not support the policy and 23% of respondents were unsure. Concern was raised over the fact that small scale waste sites could inappropriately develop into large scale ones. There was also a suggestion that this policy could be combined with Core Strategy Policy 3. There was support for the policy with a number of respondents agreeing with the line on prioritising sites within or in close proximity to the primary or secondary settlements, especially as this was likely to reduce transport distances.

6.97 Core Strategy Policy 5 – Proposals for reuse, recycling, waste transfer/storage and composting

The majority of respondents agreed with this policy (82%) and 18% of respondents were unsure. There didn’t appear to be any respondents who did not agree with the policy. Comments for this section were mostly supportive, however it was suggested that the strategy should look at cross boundary solutions, particularly where there are existing facilities in place.

6.98 Core Strategy Policy 6 – Proposals for other types of recovery

A total of 82% of respondents agreed with this policy, 7% did not agree with the policy and 11% were unsure. There was some concern over the fact that energy recovery systems would need materials for maximum energy recovery and that as a result of this, the demand for materials could result in a decrease in recycling. There was also a suggestion that the final statement requires greater clarification on the management of residues.

6.99 Core Strategy Policy 7 – Landfill Developments

The majority of respondents agreed with this policy. A total of 29 responses were received and only one did not agree with the policy. The main comments arising from this policy were that the only criteria for landfill sites should be for agricultural land improvement with a view to improved yield for food production. Further, it was suggested that the Environment Agency's landfill location position statement is incorporated into the policy. There were also comments in support of a policy for landfill development.

6.910 Core Strategy Policy 8 – Safeguarding of Waste Management Sites

There was strong support for this policy, with 96% of respondents agreeing with it. Only 4% of respondents did not agree. There were very few additional comments made, however it was suggested that as some waste management sites are vast, these could be delivered for mixed use. There was also a suggestion that any opportunities to address any existing conflicting land use between waste and non waste developments could be addressed.

6.911 Development Management Policy 1 – Protection of the natural and built environment

A total of 29 responses were received. 79% of the respondents agreed with this policy, 7% disagreed and the remaining 14% of respondents were unsure. One of the issues that arose a number of times was to make reference to Green Infrastructure. It was also recommended that there should be some acknowledgement of the biodiversity offsetting scheme within the Waste Core Strategy. In addition, there were also comments requesting that the word "historic" is added to the first sentence of the policy and that non-designated historic buildings of local significance be added to 'features of local importance'. There were concerns that there is an over emphasis on archaeological matters rather than heritage assets as a whole and that there is no mention of flood protection.

6.912 Development Management Policy 2 – Managing Health and Amenity Impacts of Waste Development

A total of 27 responses were received. 81% of respondents agreed, 15% disagreed and 4% of respondents were unsure. It was suggested that the list of potential areas of impact should also include, socio economic effects, landscape, archaeology, cultural heritage and public access and recreation. There should be a need to explicitly reduce the impact on Air Quality Management Zones. Finally, the policy should more clearly emphasise the requirement to acknowledge in-combination impacts as a result of other development proposals.

6.913 Development Management Policy 3 – Sustainable Transportation

A total of 28 responses were received. There were 22 who agreed with the policy, 2 respondents who did not agree and 4 who were unsure. Comments that were received suggested that the policy would be better focused on making road transportation as sustainable as possible, and possibly navigable waterways if these are a practical option. Further, there should be a need to explicitly reduce impact on Air Quality Management Zones and there should be improved provision for cycling and walking to reduce hazards.

6.914 Development Management Policy 4 – Design of New Waste Management Facilities

There was favourable support for this policy with 85% of respondents in support, 11% who were unsure and 4% who did not support the policy. Comments suggested that the policy refer to a BREEAM on equivalent standard as a design requirement. The policy should also require a high quality of design with an appropriate level of innovation and respect for the local surroundings. There could also be a requirement for applicants to demonstrate how pre-application consultation feedback has been taken into account in the scheme design.

6.915 Development Management Policy 5 – Recreational Assets and Public Rights of Way

This policy was strongly supported with 93% of respondents in support of the policy, 4% unsure and 4% who did not agree. The comments received reinforced the strong support for the protection of Public Rights of Way and recreational assets.

6.916 Development Management Policy 6 – Flood Risk and Water Quality

This policy received 27 responses. There were 24 responses in support of the policy and 3 who were unsure. This policy did not receive any comments from respondents who did not agree.

6.917 Development Management Policy 7 – Aviation Safeguarding

This policy was well supported with 89% of respondents in agreement and 11% unsure. Again, this policy did not receive comments from anyone who did not support the policy.

6.918 Development Management Policy 8 – Temporary uses and their restoration and aftercare

The total number of respondents in support of this policy was 80%, with 12% not in support of the policy and 8% unsure. It was suggested that a definition of “temporary use” be included. There should be no temporary grants of consent as they tend to have the habit of having extended consent or even application to permanency, temporary planning permission should come with a time limit and finally reassurance should be given to ensure that land should be returned to its former state.

6.919 Conclusion

The majority of responses received to the consultation were in support of the policies put forward. All of the comments were noted and have been taken into consideration, and a Planning Officer has responded to these comments on the Objective electronic software. These have been made available on the web.

7.0 Joint working consultation activities

As well as consulting with everyone as set out in the SCI and everyone on the consultation database, a great amount of consultation and continuous engagement has taken place between adjoining local authorities.

7.1 Workshop for adjoining Local Authorities

On 2nd April 2008, an Adjoining Local Authorities forum event took place at Wedgnoock House in Warwick. The aim of the event was to bring neighbouring authorities up to date with the progress on the Waste Core Strategy , to discuss the Spatial Options proposed and to define the meaning of ‘strategic sites’. There was also a presentation and discussion on the potential for use of renewable energy at waste facilities taking into account the principles established by the “Merton Rule”.

The following Local Authorities attended the workshop:

- Solihull Metropolitan Borough Council
- Oxfordshire County Council
- Leicestershire County Council
- Worcestershire County Council
- Gloucestershire County Council
- Birmingham City Council
- Northamptonshire County Council
- Bromsgrove District Council

7.2 Letter to all adjoining Local Authorities: Cross Boundary Movements

On 20th May 2010, a letter was sent out to all adjoining Local Authorities asking them to provide data that showed the quantities and types of waste being disposed of in their county from Warwickshire. A request was also made for data on the quantities and the types of waste that is exported to sites in Warwickshire. This exercise received very little feedback although the comments that were received suggested that most of the information and data required could be obtained from the EA Waste Data Interrogator.

8.0 Conclusion

This report has provided an overview of the consultation activities that have been undertaken throughout the Waste Core Strategy process. It has also set out who has been consulted and the responses that have been made.

A further report will be produced following the next stage of consultation. This will incorporate all of the representations that have been made during the Publication consultation period.

APPENDICES

Appendix A: Public Notices

Preliminary Consultation, July 2005



NOTICE OF WASTE DEVELOPMENT FRAMEWORK – CORE STRATEGY – PRELIMINARY CONSULTATION

TOWN AND COUNTRY PLANNING (LOCAL DEVELOPMENT) (ENGLAND) REGULATIONS 2004

WARWICKSHIRE WASTE DEVELOPMENT FRAMEWORK 2005-2021

Warwickshire County Council is undertaking the preliminary consultation on the Core Strategy of the Waste Development Framework called Early Stakeholder and Community Engagement for the above Plan.

Copies of the questionnaire are available on the Council's website www.warwickshire.gov.uk/wastecorestrategy and the leaflet containing the questionnaire and the existing Waste Local Plan are available for public inspection, free of charge, on Mondays to Fridays during normal office hours at the following places:

Warwickshire County Council, Shire Hall (Market Place Reception),
Warwick.

Warwickshire County Council, Department of Planning, Transport and
Economic Strategy, Barrack Street, Warwick.

The Planning Receptions at:

- North Warwickshire Borough Council, Council Offices, South Street, Atherstone.
- Nuneaton and Bedworth Borough Council, Town Hall, Coton Road, Nuneaton.
- Rugby Borough Council, Town Hall, Evreux Way, Rugby.
- Stratford-on-Avon District Council, Elizabeth House, Church Street, Stratford upon-Avon.
- Warwick District Council, Riverside House, Milverton Hill, Leamington Spa

We would like your views on the preliminary consultation and these can be made either on-line via the Council's website, in writing on the consultation form and sent to The Strategy Unit at the above Warwickshire County Council address. We would be grateful if you could send your views by Monday 22nd August 2005 but obviously recognise that this is an on-going process.

John Deegan
Director of Planning, Transport and Economic Strategy

14th July 2005

Issues and Options Consultation, 2006



TOWN AND COUNTRY PLANNING (LOCAL DEVELOPMENT) (ENGLAND) REGULATIONS 2004

WARWICKSHIRE WASTE CORE STRATEGY: ISSUES AND OPTIONS CONSULTATION

As part of the new planning system introduced last year by Government, Warwickshire County Council, as the Waste Planning Authority, is required to produce a Waste Development Framework (WDF). This is a portfolio of policy documents, which will replace what used to be the Waste Local Plan. The Core Strategy will establish the framework within which applications for waste disposal facilities should be assessed.

Warwickshire County Council has produced a paper outlining the waste issues in Warwickshire and possible options for dealing with them. We would like to know which options you think the County Council should pursue in the Waste Development Framework Core Strategy. Make your views known by filling in the Waste Issues and Options consultation questionnaire. This questionnaire is available to complete online at www.warwickshire.gov.uk/wastecorestrategy and is available at the following places:

Warwickshire County Council Offices; Shire Hall, Warwick and Barrack Street, Warwick;

All Warwickshire libraries;

The Planning Receptions at:

- North Warwickshire Borough Council, Council Offices, South Street, Atherstone.
- Nuneaton and Bedworth Borough Council, Town Hall, Coton Road, Nuneaton.
- Rugby Borough Council, Town Hall, Evreux Way, Rugby.
- Stratford-on-Avon District Council, Elizabeth House, Church Street, Stratford-upon-Avon.
- Warwick District Council, Riverside House, Milverton Hill, Leamington Spa

We are also sending copies of the Waste Issues and Options paper and questionnaire to all those on our existing mailing list. If you would like to receive a paper copy of the questionnaire contact us on 01926 412538, by e-mail planningstrategy@warwickshire.gov.uk or in writing:

Strategy Unit; Planning Transport and Economic Strategy; Warwickshire County Council; PO Box 43; Shire Hall; Warwick; CV34 4SX.

We would be grateful if you could send us your views by 10th April 2006.

Preferred Option Consultation, August 2006



TOWN AND COUNTRY PLANNING (LOCAL DEVELOPMENT) (ENGLAND) REGULATIONS 2004 WARWICKSHIRE WASTE CORE STRATEGY: PREFERRED OPTIONS AND PROPOSALS CONSULTATION

As part of the new planning system introduced last year by Government, Warwickshire County Council, as the Waste Planning Authority, is required to produce a Waste Development Framework (WDF). This is a portfolio of policy documents, which will replace what used to be the Waste Local Plan. The Core Strategy will establish the framework within which applications for waste disposal facilities should be assessed.

Warwickshire County Council has previously consulted on waste issues and possible options for dealing with them. Using responses submitted during this earlier consultation we have produced a paper outlining the Preferred Options and Proposals. We would like you to tell us your views on these proposals by filling in the 'WDF Core Strategy: Preferred Options and Proposals Consultation Questionnaire'. This questionnaire is available to complete online at www.warwickshire.gov.uk/wastecorestrategy and is available at the following places:

Warwickshire County Council Offices; Shire Hall, Warwick and Barrack Street, Warwick;

All Warwickshire libraries;

The Planning Receptions at:

- North Warwickshire Borough Council, Council Offices, South Street, Atherstone.
- Nuneaton and Bedworth Borough Council, Town Hall, Coton Road, Nuneaton.
- Rugby Borough Council, Town Hall, Evreux Way, Rugby.
- Stratford-on-Avon District Council, Elizabeth House, Church Street, Stratford-upon-Avon.
- Warwick District Council, Riverside House, Milverton Hill, Leamington Spa

As part of the consultation process we have arranged a public consultation event; a Waste Workshop on 7th October 2006 for anybody who would like to attend. A Planning Officer will also be available at the main libraries at various times throughout the consultation period. Please contact us for further details.

We are also sending copies of the WDF Core Strategy: Preferred Options and Proposals paper and questionnaire to all those on our existing mailing list. If you would like to receive a paper copy of the questionnaire contact us on 01926 412455, by e-mail

planningstrategy@warwickshire.gov.uk

or in writing:

Planning Policy; Environment and Economy; Warwickshire County Council; PO Box 43; Shire Hall; Warwick; CV34 4SX.

When making a representation you may request to be notified, at a specified address, that this document has been submitted to the Secretary of State for independent examination under Section 20 and of the adoption of the document.

We would be grateful if you could send us your views by 11th October 2006.

Emerging Spatial Options Consultation, March 2011



TOWN AND COUNTRY PLANNING (LOCAL DEVELOPMENT) (ENGLAND) (AMENDMENT) REGULATIONS 2008

WARWICKSHIRE WASTE CORE STRATEGY: EMERGING SPATIAL OPTIONS CONSULTATION

As part of the new planning system introduced by Government, Warwickshire County Council, as the Waste Planning Authority, is required to produce a Waste Development Framework (WDF). This will replace what used to be the Waste Local Plan. The Core Strategy will establish the framework within which applications for waste management facilities will be assessed until 2028.

Warwickshire County Council has previously consulted on waste issues and options and the preferred options for waste management. Having considered responses submitted during the earlier consultations the Council has produced an 'Emerging Spatial Options' paper to seek your views on which Spatial Option the County Council should pursue in the Waste Development Framework Core Strategy. The Council would also like any further comments you might have on the key issues. Make your views known by filling in the Waste Emerging Spatial Options consultation questionnaire. This consultation document and questionnaire is available online at www.warwickshire.gov.uk/wastecorestrategy and available at the following places:

- Warwickshire County Council Offices; Shire Hall, Warwick;
- All Warwickshire libraries; and
- The Planning Receptions at:
 - North Warwickshire Borough Council, Council Offices, South Street, Atherstone.
 - Nuneaton and Bedworth Borough Council, Town Hall, Coton Road, Nuneaton.
 - Rugby Borough Council, Town Hall, Evreux Way, Rugby.
 - Stratford-on-Avon District Council, Elizabeth House, Church Street, Stratford-upon-Avon.
 - Warwick District Council, Riverside House, Milverton Hill, Leamington Spa

A Planning Officer will be available at various locations during the consultation period. Please visit www.warwickshire.gov.uk/wastecorestrategy or contact us for further details.

Copies of the questionnaire are being sent to all those on the Waste Development Framework mailing list. If you would like to receive a paper copy of the questionnaire contact us on 01926 412391 or 01926 412907, by e-mail planningstrategy@warwickshire.gov.uk or in writing: Planning Policy; Environment and Economy; Warwickshire County Council; PO Box 43; Shire Hall; Warwick; CV34 4SX.

Warwickshire County Council would be grateful if you could submit your views by 20th May 2011.

Paul Galland
Strategic Director for Environment and Economy
21st March 2011

Preferred Option Consultation, September 2011



TOWN AND COUNTRY PLANNING (LOCAL DEVELOPMENT) (ENGLAND) (AMENDMENT) REGULATIONS 2008

WARWICKSHIRE WASTE CORE STRATEGY: PREFERRED OPTION AND POLICIES CONSULTATION

As part of the new planning system introduced by Government, Warwickshire County Council, as the Waste Planning Authority, is required to produce a Waste Development Framework (WDF). This will replace what used to be the Waste Local Plan. The Core Strategy will establish the framework within which applications for waste management facilities will be assessed until 2028.

The County Council has previously consulted on Waste Issues and Options and the Preferred Options for waste management. Having considered and analysed responses submitted during the earlier consultations, a paper has been produced called "**Warwickshire's Waste Development Framework Core Strategy: Preferred Option and Policies document**". This outlines the preferred spatial option, as to where future waste management facilities should be located throughout the County.

Warwickshire County Council would like to receive your comments on the Draft Core Strategy Policies and Draft Development Management Policies within this document. The statutory consultation period will run from **26th September 2011** until **7th November 2011**.

The consultation document and supporting technical information can be viewed online at www.warwickshire.gov.uk/wastecorestrategy.

and is available at the following places:

- Warwickshire County Council Offices; Shire Hall, Warwick;
- All Warwickshire libraries; and
- The Planning Receptions at:
 - North Warwickshire Borough Council, Council Offices, South Street, Atherstone.
 - Nuneaton and Bedworth Borough Council, Town Hall, Coton Road, Nuneaton.
 - Rugby Borough Council, Town Hall, Evreux Way, Rugby.
 - Stratford-on-Avon District Council, Elizabeth House, Church Street, Stratford-upon-Avon.
 - Warwick District Council, Riverside House, Milverton Hill, Leamington Spa

A Planning Officer will also be available at various locations during the consultation period. Please visit www.warwickshire.gov.uk/wastecorestrategy or contact us for further details.

We are sending copies of the questionnaire to all those on our existing mailing list. If you would like to receive a paper copy of the questionnaire please contact us on 01926 412391, by e-mail planningstrategy@warwickshire.gov.uk or in writing:

Planning and Development Group, Communities, Warwickshire County Council; PO Box 43; Shire Hall; Warwick; CV34 4SX.

Monica Fogarty
Strategic Director for Communities
26th September 2011

Appendix B: Press Releases

Issues and Options Consultation, 2nd March 2006

You won't be 'wasting' your time

Warwickshire's residents will not be 'wasting' their time if they get out and start expressing their views on the future planning policy on waste issues at a special forum this month.

Warwickshire County Council is holding a Waste Development Forum as part of its extensive consultation activities. It is seeking to widen participation and community involvement in the Waste Development Framework that will become the policy guide to dealing with planning applications for waste treatment sites countywide.

The forum will include representatives from industry, the voluntary sector, advisory bodies, policy makers and the community.

Cllr Chris Saint, the county Cabinet member with responsibility for planning policy, said: "Forum members are being asked to understand, discuss and challenge the 'Waste Core Strategy: Issues and Options Paper'; in the interest of ensuring that Warwickshire is addressing the right issues in the preparation of the Waste Development Framework."

Members of the public are invited to attend a one-day Waste Development Framework Public Consultation Workshop on Saturday the 18th March.

In preparation for the meeting, Warwickshire's 'Waste Core Strategy: Issues and Options Paper' may be viewed online. Please visit:
<http://www.warwickshire.gov.uk/wastecorestrategy> for details.

Anyone with views on how planning can deliver sustainable waste development can express an interest in attending the Workshop by telephoning Suzanne Osborn, Senior Planning Officer, on (01926) 412538 or email:
planningstrategy@warwickshire.gov.uk by the 10th March 2006.

Ends

For more information contact Suzanne Osborn on 01926 412538.

Preferred Option Consultation, 2006

Press Release

Is how we make provision for the management of wastes in Warwickshire a total waste of time? The people of Warwickshire are being asked to express their views on the future planning policy on waste issues.

Warwickshire County Council's Waste Development Framework will be part of the local planning framework required under new legislation. The County Council is inviting people to become involved in the next stage of the process to create this new policy.

Warwickshire County Council is holding a series of consultation events including library drop in sessions, an industry forum and a workshop for the public in order to widen involvement and raise awareness of the issues related to sustainable waste development in, and around, the county.

Members of the public are invited to attend a one-day Waste Development Workshop on Saturday 7 October 2006 and are asked to register their attendance by telephoning Derek Greedy on 01926 412455 by 26 September 2006.

Cllr Chris Saint, the county Cabinet member with responsibility for planning policy, said: "Forum members are being asked to understand, discuss and challenge the 'Waste Core Strategy: Preferred Options and Proposals Paper'; in the interest of ensuring that Warwickshire is addressing the right issues in the preparation of the Waste Development Framework."

In preparation for the meeting, Warwickshire's 'Waste Core Strategy: Preferred Options and Proposals Paper' may be viewed online. Please visit: <http://www.warwickshire.gov.uk/wastecorestrategy> for details.

Anyone unable to attend this meeting, but interested in the preparation of the Waste Development framework Core Strategy, is invited to attend one of our 'drop-in' sessions held at libraries across the county. The details are listed below:

Rugby Library on 19 September 2006	3.00pm	-	8.00pm
Stratford-upon-Avon on 25 September 2006	9.00am	-	2.00pm
Warwick Library on 28 September 2006	9:00am	-	1:00pm
Kenilworth Library on 10 October 2006	10.00am	-	3.00pm

Anyone interested in expressing their views in writing may complete and return the "Waste Development Framework: Preferred Options and Proposals Questionnaire" by 11 October 2006.

The questionnaire is available from local council offices or libraries or on-line at www.warwickshire.gov.uk/wastecorestrategy until 11 October 2006.

Alternatively telephone 01926 412455 or email planningstrategy@warwickshire.gov.uk for further information.

Ends

For more information contact Derek Greedy on 01926 412455.

Emerging Spatial Options Consultation, March 2011

A chance to influence county waste planning policy

As part of the new planning system introduced by Government, Warwickshire County Council, as the Waste Planning Authority, is required to produce a Waste Development Framework (WDF). This will replace what used to be the Waste Local Plan. The Core Strategy will establish the framework within which applications for waste management facilities will be assessed until 2028.

Warwickshire County Council's WDF has entered a new phase of consultation and exhibitions at libraries in the county along with drop in sessions are being held across Warwickshire to encourage the county's residents to have their say on shaping a key part of future planning policy.

Warwickshire County Council has previously consulted on waste issues and options and the preferred options for waste management. Having considered responses submitted during the earlier consultations, a paper has been produced outlining Emerging Spatial Options. The five draft spatial options are intended to set out where future waste management facilities should be located throughout the County.

We would like to know which Spatial Option you think the County Council should pursue in the WDF Core Strategy together with any comments you might have on the key issues. Each representation received will be considered by Warwickshire County Council and will inform and influence the next stage of the Waste Core Strategy which will be a 'Preferred Option and Draft Policies' document to be produced for consultation in August 2011.

The current consultation is the Waste Core Strategy: Emerging Spatial Options, which has an 8 week consultation period, where the general public, organisations and any other stakeholders can respond and comment. The consultation will start on **Monday 21st March 2011** and end on **Friday 20th May 2011**.

There are a number of ways in which the general public can become involved, details of which are available online at: www.warwickshire.gov.uk/wastecorestrategy together with the consultation document and questionnaire.

Copies of the questionnaire can also be obtained from the Council by ringing 01926 412391.

As part of the process the council has arranged a public consultation event, a waste forum on 6th May 2011 for anybody who would like to attend. A Planning Officer will also be available at various locations during the consultation period. Please visit www.warwickshire.gov.uk/wastecorestrategy or contact us for further details.

Ends

For more information please contact Tony Lyons on 01926 412391 or Adam James on 01926 412538 .

Preferred Option and Policies, September 2011

A chance to influence county waste planning policy

As part of the new planning system introduced by Government, Warwickshire County Council, as the Waste Planning Authority, is required to produce a Waste Development Framework (WDF). This will replace what used to be the Waste Local Plan. The Core Strategy will establish the framework within which applications for waste management facilities will be assessed until 2028.

Warwickshire County Council's WDF Core Strategy has entered a new phase of consultation. The County Council has previously consulted on the key issues and options for planning future waste development in the County. During the last stage of consultation, the Council consulted on five spatial options for locating new waste development in the County. Having analysed the responses received and tested the options through a Sustainability Appraisal, 'option 5' has been chosen to be taken forward as the basis for consultation on a preferred spatial option.

The **Waste Core Strategy: Preferred Option and Policies** consultation document sets out the preferred spatial option in greater detail. We would like comments on this preferred strategy and the draft Development Plan policies that will be used to assess planning applications for new waste developments, together with the vision and objectives for the Core Strategy. The consultation document and supporting technical information can be viewed online at www.warwickshire.gov.uk/wastecorestrategy.

The consultation period will run from **26th September 2011** until **18th November 2011**. Each representation received will be considered and will inform and influence the next stage of the Waste Core Strategy, to be consulted on in March 2012.

Exhibitions are being held at libraries in the county, along with 'drop in' sessions to encourage the county's residents, organisations and other stakeholders to have their say on shaping a key part of future planning policy. Please visit www.warwickshire.gov.uk/wastecorestrategy or contact us for further details on how to become involved.

Copies of the consultation document and questionnaire are available from County libraries and District and Borough planning receptions. Copies of the questionnaire can also be obtained from the Council by ringing 01926 41 2391.

Ends

For more information please contact Tony Lyons on 01926 412391 or Adam James on 01926 412538.

Appendix C: Consultation letters

Preliminary Consultation

Dear Consultee

RE: WASTE DEVELOPMENT FRAMEWORK – CORE STRATEGY – PRELIMINARY CONSULTATION

Thank you for your inquiry concerning the Waste Development Framework Consultation. Warwickshire County Council as Waste Planning Authority is charged with preparing a new Framework for Waste in Warwickshire. The new Waste Development Framework will replace the existing Waste Local Plan.

In July, the County Council published a preliminary consultation paper entitled Waste Development Framework – Core Strategy - Preliminary Consultation. I enclose a copy of this consultation paper for your information and comment, this includes a questionnaire and a pre-paid envelope. These documents are also available to view and answer on the County Council's website at www.warwickshire.gov.uk/wastecorestrategy and this includes a copy of the on-line questionnaire. The consultation paper can be made available in alternative formats (e.g. large print or audiotape) and can be explained in a range of languages. Please contact us for details.

The new Framework provides an opportunity for those members of the community who are interested in waste to engage with stakeholders and the County Council in preparing the new waste documents. This consultation is part of an ongoing process which will feed into the development and drafting of the new policies and proposals which will replace those in the existing Waste Local Plan. Contributions to Stage 1 Consultation are welcome from all interested parties.

The consultation period ends on Monday 22nd August. We look forward to receiving your comments by this date.

The programme for the preparation of the Waste Development Framework is set out in the Minerals and Waste Development Scheme which can be viewed on the web site at www.warwickshire.gov.uk/MWDF

I do hope you will take the opportunity to respond fully to this preliminary consultation and contribute to the preparation and development of the Waste Development Framework. Should you have any queries please contact me on 01926 412391 or email heidiantrobus@warwickshire.gov.uk.

Yours sincerely

Heidi Antrobus
Senior Planning Officer
The Strategy Unit

Issues and Options Consultation, 2006

Standard letter sent to all consultees

Dear Consultee

Waste Core Strategy: Issues and Options Consultation.

The purpose of the Waste Development Framework is to make sufficient land available in the most sustainable locations to enable waste operating companies to provide adequate facilities to dispose of waste in Warwickshire. Before the County Council can identify specific sites there has to be an agreed strategy that determines the broad approach to waste disposal. This Waste Core Strategy is the subject of our current consultation.

The County Council has identified several issues, based on your responses to the previous consultation and national and regional guidance, and outlined various options for dealing with these issues. These are set out in **Warwickshire's Waste Development Framework Core Strategy: Issues and Options paper** which is included with this letter. We would like your views about how you think the issues set out can be dealt with.

The statutory consultation period will run from 27th February until 10th April 2006.

You can make your views known by completing the enclosed questionnaire and returning it by email to planningstrategy@warwickshire.gov.uk or by post to Strategy Unit, Planning, Transport and Economic Strategy, PO Box 43, Shire Hall, Warwick, CV34 4SX. Alternatively the questionnaire is available to complete on our website: www.warwickshire.gov.uk/wastecorestrategy

If you have any comments about how we have consulted you or any suggested improvements please send your comments either by e-mail to planningstrategy@warwickshire.gov.uk or in writing to:

Strategy Unit
Planning Transport and Economic Strategy
Warwickshire County Council
PO Box 43
Shire Hall
Warwick
CV34 4SX

All comments will be considered in our annual review of the Statement of Community Involvement and will be published in our Annual Monitoring Report.

We would request that all completed questionnaires be sent to us by Monday 10th April 2006.

Yours sincerely



Suzanne Osborn
Planning Officer

Preferred Options Consultation, 2006

Standard letter sent to all waste consultees

30 August 2006

Dear Consultee,

TOWN AND COUNTRY PLANNING (LOCAL DEVELOPMENT) (ENGLAND) REGULATIONS 2004

WARWICKSHIRE WASTE CORE STRATEGY: PREFERRED OPTIONS AND PROPOSALS CONSULTATION

The purpose of the Waste Development Framework is to make sufficient land available in the most sustainable locations to enable waste operating companies to provide adequate facilities for waste management in Warwickshire. Before the County Council can identify specific sites there has to be an agreed strategy that determines the broad approach to waste Management. This Waste Core Strategy is the subject of our current consultation.

The County Council has identified several issues and outlined the preferred options for dealing with these issues based on your responses to the previous consultation. They are set out in **Warwickshire's Waste Development Framework Core Strategy: Preferred Options and Proposals paper** which is included with this letter. We would like your views on the preferred options for dealing with waste issues in the county.

The statutory consultation period will run from 30th August 2006 until 11th October 2006.

You can make your views known by completing the enclosed questionnaire and returning it by post in the enclosed pre-paid envelope to Planning Policy, Environment and Economy, PO Box 43, Shire Hall, Warwick, CV34 4SX. Alternatively the questionnaire is available to complete on our website: www.warwickshire.gov.uk/wastecorestrategy.

As part of the consultation process we have arranged a public consultation event; a Waste Workshop at Manor Hall, Leamington Spa, on Saturday 7th October 2006 from 10.00am to 12.30pm for anybody who would like to attend. Please contact us via telephone, e-mail or post if you would like to take part. In addition to this 'drop-in' sessions will be held at the main libraries across the county. The details are listed below:

- | | |
|--|------------------|
| • Atherstone Library on 5 September 2006 | 1.00pm – 6.00pm |
| • Nuneaton Library on 8 September 2006 | 1.00pm – 6.00pm |
| • Rugby Library on 19 September 2006 | 3.00pm – 8.00pm |
| • Stratford-upon-Avon on 25 September 2006 | 9.00am – 2.00pm |
| • Warwick Library on 28 September 2006 | 9:00am – 1:00pm |
| • Kenilworth Library on 10 October 2006 | 10.00am – 3.00pm |

Further, the Preferred Options and proposals paper and questionnaire are also available during normal office hours at the following locations:

Warwickshire County Council Offices; Shire Hall, Warwick and Barrack Street,
Warwick;

All Warwickshire libraries and the Planning Receptions at:

- North Warwickshire Borough Council, Council Offices, South Street, Atherstone.
- Nuneaton and Bedworth Borough Council, Town Hall, Coton Road, Nuneaton.
- Rugby Borough Council, Town Hall, Evreux Way, Rugby.
- Stratford-on-Avon District Council, Elizabeth House, Church Street, Stratford-upon-Avon.
- Warwick District Council, Riverside House, Milverton Hill, Leamington Spa.

When making a representation you may request to be notified, at a specified address, that this document has been submitted to the Secretary of State for independent examination under section 20 and of the adoption of the document.

If you have any comments about how we have consulted you or any suggested improvements please send your comments either by e-mail to planningstrategy@warwickshire.gov.uk or in writing to:

Planning Policy
Environment and Economy
Warwickshire County Council
PO Box 43
Shire Hall
Warwick
CV34 4SX

All comments will be considered in our annual review of the Statement of Community Involvement and will be published in our Annual Monitoring Report.

We would request that all completed questionnaires are returned to us by 11th October 2006.

Yours sincerely



Derek Greedy
Principal Waste Management Advisor

Letter sent to all libraries

Dear Sir/Madam

TOWN AND COUNTRY PLANNING (LOCAL DEVELOPMENT) (ENGLAND) REGULATIONS 2004

WARWICKSHIRE WASTE CORE STRATEGY: PREFERRED OPTIONS CONSULTATION

Warwickshire County Council is at the Preferred Options and Proposals consultation stage in preparing the Warwickshire Waste Core Strategy. The consultation period runs from 30th August until 11th October 2006. Please find enclosed the Preferred Options and Proposals Consultation packs to be made available to the general public during this period.

The consultation pack contains:

- A covering letter
- The 'Warwickshire Waste Development Framework Core Strategy: Preferred Options and Proposals' paper
- A questionnaire
- A pre paid reply envelope

We would be grateful if you would remove any documents you may still have from previous Warwickshire County Council Waste consultations and make the enclosed packs available to the general public. Please retain one copy as a reference document.

If further copies of the consultation pack are needed please contact

Planning Policy
Environment and Economy
Warwickshire County Council
PO Box 43
Shire Hall
Warwick
CV34 4SX

Or telephone the number at the top of the page.

Yours faithfully



Derek Greedy
Principal Waste Management Advisor

Letter sent to Waste Forum invitees

Dear Forum Member

Warwickshire County Council Minerals Development Consultation

Invitation to attend Warwickshire's Waste Development Forum

Warwickshire County Council would like to invite you to participate in Warwickshire's Waste Development Forum. The Council is now at the Preferred Options and Proposals stage in the preparation of the Warwickshire Waste Local Development Framework: Core Strategy.

At the Forum you will be asked to discuss the 'Waste Core Strategy: Preferred Options and Proposals Paper' and therefore contribute to the next stage of the process, the submission of the Waste Core Strategy to the Secretary of State in January 2007.

The Waste Development Forum is open to all stakeholders on our membership database and will be held at Manor Hall in Leamington Spa on 26th September 2006. The forum will start at 5.30pm and last for approximately three hours. The full agenda for the meeting and directions to the venue will be circulated nearer the time.

In preparation for the meeting, Warwickshire's 'Waste Core Strategy: Preferred Options and Proposals Paper' may be viewed online, or a paper copy may be requested. Please visit: <http://www.warwickshire.gov.uk/wastecorestrategy> or telephone Warwickshire County Council's Planning Policy Unit on (01926) 412061 or 412455.

To help us plan for this meeting, please confirm your attendance in writing, by email or by telephone by 18th September 2006 and inform us if you have any special dietary requirements.

For those who are unable to attend this meeting during the week, a half day Development Framework Public Consultation Workshop (which will be covering a similar agenda) will be held at the same venue at 10:00 until 12:30 on Saturday the 7th October 2006. Please express an interest in this alternative event if it is your preferred method of participation.

As a key stakeholder your knowledge, experience and views are valuable in the process of planning sustainable Waste Management in Warwickshire, and we hope you will be able to join us.

Yours sincerely



Derek Greedy
Principal Waste Management Advisor

Emerging Spatial Options, 15 March 2011

Standard letter sent to all consultees

Dear Consultee

TOWN AND COUNTRY PLANNING (LOCAL DEVELOPMENT) (ENGLAND) REGULATIONS 2008 - WARWICKSHIRE WASTE CORE STRATEGY: EMERGING SPATIAL OPTIONS CONSULTATION

The Core Strategy of the Waste Development Framework is a Development Plan Document which sets out the Spatial Strategy, Vision, Objectives and Policies for managing waste for a 15 year plan period up to 2027/2028. It also provides the framework for implementation and monitoring and for waste development management.

Although the County Council has previously consulted on waste issues and options and the preferred options for waste management, the spatial options to deliver the waste strategy were not considered in enough detail to demonstrate that the final locational strategy represents the best way forward. Therefore, Warwickshire County Council has been developing spatial options that will determine where future waste management facilities should be located in the County. They are set out in **Warwickshire's Waste Development Framework Core Strategy: Emerging Spatial Options document**. The consultation document and supporting technical information can be viewed online at www.warwickshire.gov.uk/wastecorestrategy.

Warwickshire County Council would like to know which Spatial Option you think the County Council should pursue in the Waste Development Framework Core Strategy, together with any comments you might have on the key issues. The statutory consultation period will run from **21st March 2011** until **20th May 2011**.

You can make your views known by submitting comments through our easy-to-use 'Limehouse' consultation system at www.warwickshire.gov.uk/wastecorestrategy. Alternatively the questionnaire is available to download at the above website and can be emailed to planningstrategy@warwickshire.gov.uk.

Hard copies of the questionnaires can be returned using the following freepost address:

Waste Core Strategy – Emerging Spatial Options
Strategic Development and Housing
Environment and Economy Directorate
Warwickshire County Council
FREEPOST LG111
PO Box 43
Warwick
CV34 4BR

As part of the consultation process we have arranged a number of 'drop-in' sessions that will be held at the main libraries across the county. The details are listed below:

- | | |
|--------------------------------------|-------------------|
| • Stratford Library on 28 March 2011 | 12.00pm – 17.30pm |
| • Warwick Library on 7 April 2011 | 12.00pm – 18.00pm |
| • Rugby Library on 20 April 2011 | 12.00pm – 17.00pm |
| • Nuneaton Library on 4 May 2011 | 12.00pm – 18.00pm |
| • Atherstone Library on 9 May 2011 | 12.00pm – 18.00pm |

In addition, exhibition boards will be displayed in libraries around the county during the consultation:

Alcester Library – 21st – 24th March 2011
2011*
Stratford Library – 25th – 28th March 2011
2011
Shipston Library – 29th – 31st March 2011
May 2011
Southam Library – 1st – 3rd April 2011
May 2011
Warwick Library – 4th – 7th April 2011
2011
Leamington Library – 8th – 10th April 2011
2011
Kenilworth Library – 11th – 14th April 2011
2011*

Bulkington Library – 15th – 18th April
Rugby Library – 19th – 27th April
Bedworth Library – 28th Apr – 3rd
Nuneaton Library – 4th May – 8th
Atherstone Library – 9th – 12th May
Coleshill Library – 13th – 16th May
Polesworth Library – 17th – 20th May

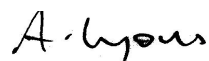
* These dates are subject to confirmation. Please check with your local library nearer the time or visit www.warwickshire.gov.uk/wastecorestrategy.

The Emerging Spatial Options document and questionnaire is also available during normal office hours at the Warwickshire County Council Offices, all Warwickshire libraries and the District and Borough Planning Offices.

If you have any comments about how Warwickshire County Council has consulted you or any suggested improvements please send your comments either by e-mail to planningstrategy@warwickshire.gov.uk or in writing to the above postal address.

Please note that completed questionnaires must be returned by **20th May 2011**.

Yours sincerely



Tony Lyons
Principal Planning Officer
Planning Policy

Preferred Option Consultation, 2011

Standard letter sent to all consultees

Dear Consultee

TOWN AND COUNTRY PLANNING (LOCAL DEVELOPMENT) (ENGLAND) REGULATIONS 2008

WARWICKSHIRE WASTE CORE STRATEGY: PREFERRED OPTION AND POLICIES CONSULTATION

The Core Strategy of the Waste Development Framework is a Development Plan Document which sets out the spatial strategy, vision, objectives and policies for managing waste for a 15 year plan period up to 2027/2028. It also provides the framework for implementation and monitoring and for waste development management.

The County Council has previously consulted on the key issues and options for planning future waste development in the County. During the last stage of consultation, the Council consulted on five spatial options for locating new waste development in the County. Having analysed the responses received and tested the options through a Sustainability Appraisal, 'option 5' has been chosen to be taken forward as the basis for consultation on a preferred spatial option.

The Council have now produced a **Waste Core Strategy: Preferred Option and Policies** consultation document. The document sets out the preferred spatial option in greater detail and provides draft Core Strategy and Development Management policies that will be used to assess the acceptability of new waste management proposals. The consultation document and supporting technical information can be viewed online at www.warwickshire.gov.uk/wastecorestrategy.

The County Council would like to receive your comments on the preferred option, together with the draft Core Strategy and Development Management policies. There is also another opportunity to comment on the Core Strategy's spatial vision and objectives. The consultation period will run for six weeks, from **26th September 2011** until **18th November 2011**.

You can make your views known by submitting comments through our easy-to-use 'Objective' consultation system at www.warwickshire.gov.uk/wastecorestrategy. Alternatively the questionnaire is available to download at the above website and can be emailed to planningstrategy@warwickshire.gov.uk.

Hard copies of the questionnaires can be returned using the following freepost address:

Waste Core Strategy – Preferred Option and Policies Consultation
Planning and Development Group
Communities
Warwickshire County Council
FREEPOST LG111
PO Box 43
Warwick
CV34 4BR

As part of the consultation process we have arranged a number of 'drop-in' sessions that will be held at the main libraries across the county. The details are listed below:

- Stratford Library on 29 September 2011 12.00pm – 17.30pm
- Warwick Library on 11 October 2011 12.00pm – 17.30pm
- Rugby Library on 20 October 2011 12.00pm – 17.30pm
- Nuneaton Library on 28 October 2011 12.00pm – 17.30pm
- Atherstone Library on 1 November 2011 12.00pm – 17.30pm

In addition, exhibition boards will be displayed in libraries around the county during the consultation:

Alcester Library: 26 th – 27 th Sept 2011	Bulkington Library: 4 th – 6 th Sept 2011
Stratford Library: 28 th – 30 th Sept 2011	Rugby Library: 19 th – 24 th Oct 2011
Shipston Library: 17 th – 18 th Nov 2011	Bedworth Library: 25 th – 27 th Oct 2011
Southam Library: 1 st – 3 rd Oct 2011	Nuneaton Library: 28 th – 30 th Oct 2011
Warwick Library: 10 th – 12 th Oct 2011	Atherstone Library: 31 st Oct – 2 nd Nov 2011
Leamington Library: 7 th – 9 th Oct 2011	Coleshill Library: 3 rd – 4 th Nov 2011
Kenilworth Library: 13 th – 16 th Oct 2011	Polesworth Library: 5 th – 7 th Nov 2011

The Preferred Option and Policies document and questionnaire is also available during normal office hours at the Warwickshire County Council Offices, all Warwickshire libraries and the District and Borough Planning Offices.

If you have any comments about how Warwickshire County Council has consulted you or any suggested improvements, please send your comments either by e-mail to planningstrategy@warwickshire.gov.uk or in writing to the above postal address.

Please note that completed questionnaires must be returned by **18th November 2011.**

Yours sincerely



Tony Lyons
Planning Officer
Planning Policy

Letter to Adjoining Local Authorities

20 May 2010

Dear

Cross boundary movements of waste

We are in the process of preparing Waste Development Framework for Warwickshire and are currently working on the Waste Core Strategy and the development of a spatial strategy.

Paragraph 4.45 of Planning Policy Statement 12 advises that core strategies should be “coherent with the core strategies prepared by neighbouring authorities, where cross boundary issues are relevant”.

We are therefore asking if you can assist us by providing us with any data that you may have that shows the quantity and types of waste being disposed of in your county which originated in Warwickshire.

In addition, it would be helpful if you assist us by providing any data which shows the quantity and type of waste that you export to sites in Warwickshire.

It would be appreciated if you could complete the enclosed pro forma and return it to us by xxxxxxxxxxxxxxxx.

Yours sincerely

Eva Neale
Planning Officer

Cross Boundary Movements (Waste)

Warwickshire

Name of Authority

1. Existing waste facilities

Are there any significant movements of waste from within your authority boundary to any of the known waste facilities in Warwickshire which are shown on the enclosed map. If so please complete the table below.

Waste facilities in Warwickshire where waste is being transported to.	Please specify which part of your county the waste is being transported from.	Estimated quantity of waste being transported.	Type of waste being transported.

2. Provision of own waste management facilities

Please indicate whether the authority expects that the transport of waste will continue to the above facilities stated or whether a future facility in your county is planned to meet the demand.

3. Location of waste management facilities

Please could you provide a map outlining the locations of existing waste management facilities in your authority area. If you are aware of any

significant movements of waste from Warwickshire to these facilities please could you confirm the following:

a) Which facilities are being used

b) The approximate quantity of waste and the type of waste involved

Planned Capacity

1. **Your county**

a) Please could you indicate what provision you propose to make for waste facilities in your respective area that may have a bearing on cross boundary movements.

Regionally Significant Facilities

If there are any recovery or processing facilities in your area which serve an area wider than the sub-region please could you provide details of the type of facility and the location. It would also be useful if you could confirm whether provision for these facilities will be included in the Development Framework.

Thank you for taking the time to respond to the questionnaire.

Appendix D: List of Consultees

Specific Consultees

Abbots Morton Parish council
Admington Parish Council
Alcester Town Council
Alderminster Parish Council
Alvecote & Shuttington Parish Council
Ansley Parish Council
Ansty Parish Council
Appleby Magna Parish Council
Arley Parish Council
Arrow with Weethley Parish Council
Ashow & Stoneleigh Parish Council
Astley Parish Council
Aston Cantlow Parish Council
Atherstone Town Council
Atherstone on Stour Parish Council
Austrey Parish Council
Avon Dassett Parish Council
BME Network
Baddesley Clinton Parish Council
Baddesley Ensor Parish Council
Baginton Parish Council
Balsall Parish Council
Barby Parish Council
Barcheston & Willington Parish Council
Barford, Sherbourne & Wasperton Parish Council
Barton on the Heath Parish Council
Baxterley Parish Council
Baxterley Parish Council
Bearley Parish Council
Beaudesert & Henley in Arden Parish Council
Beausale, Haseley, Honiley & Wroxhall Parish Council
Bentley & Merevale Parish Council
Beoley Parish Council
Berkswell Parish Council
Bickenhill Parish Council
Bickmarsh Parish Council
Bidford on Avon Parish Council
Billesley Parish Council
Binley Woods Parish Council
Binton Parish Council
Birdingbury Parish Council
Birmingham City Council
Bishops Itchington Parish Council
Bishops Tachbrook Parish Council
Bitteswell Parish Council
Blaby District Council
Blackdown & Old Milverton Parish Council
Boddington Parish Council
Bourton and Draycote Parish Council
Brailes Parish Council

Brandon & Bretford Parish Council
Braunston Parish Council
Brinklow Parish Council
British Gas Transco
Bromsgrove District Council
Bubbenhall Parish Council
Budbrooke Parish Council
Burbage Parish Council
Burmington Parish Council
Burton Dassett Parish Council
Burton Hastings & Stretton Baskerville Parish Council
Butlers Marston Parish Council
Byfield Parish Council
Caldecote Parish Council
Castle Bromwich Parish Council
Catesby Parish Council
Cattorpe Parish Council
Cawston Parish Council
Chadshunt Parish Council
Chapel Ascote Parish Council
Charlecote Parish Council
Charwelton Parish Council
Chastleton Parish Council
Cherington & Stourton Parish Council
Cherwell District Council
Chesterton Parish Council
Churchover Parish Council
Church Lawford Parish Council
Church Lench Parish Council
Claverdon Parish Council
Claybrooke Magna Parish Council
Claybrooke Parva Parish Council
Claydon with Clattercote Parish Council
Cleeve Prior Parish Council
Clifford Chambers & Milcote Parish Council
Clifton Campville Parish Council
Clifton upon Dunsmore Parish Council
Coal Authority
Coleshill Town Council
Combroke Parish Council
Compton Verney Parish Council
Compton Wynyates Parish Council
Cookhill Parish Council
Coombe Fields Parish Council
Copston Magna Parish Council
Corley Parish Council
Cornwell Parish Council
Cosford Parish Council
Cotesbach Parish Council
Cotswold District Council
Coughton Parish Council
Coventry City Council
Coventry Teaching Primary Care Trust
Crick Parish Council

Cubbington Parish Council
Curdworth Parish Council
Daventry District Council
Dordon Parish Council
Dorsington Parish Council
Drayton Bassett Parish Council
Dudley Metropolitan Borough Council
Dunchurch Parish Council
Easenhall Parish Council
Eathorpe, Hunningham, Offchurch & Wappenbury Parish Council
Ebrington Parish Council
Entec UK Ltd
Environment Agency
English Heritage
English Heritage
Epwell Parish Council
Ettington Parish Council
Evenlode Parish Council
Exhall Parish Council
Farnborough Parish Council
Fenny Compton Parish Council
Fillongley Parish Council
Fordbridge Parish Council
Frankton Parish Council
Fulbrook Parish Council
Gaydon Parish Council
Gloucestershire County Council
Grandborough Parish Council
Great Alne Parish Council
Great Packington & Little Packington Parish Council
Great Wolford Parish Council
Grendon Parish Council
Halford Parish Council
Hampton-in-Arden Parish Council
Hampton Lucy Parish Council
Hanwell Parish Council
Harborough District Council
Harvington Parish Council
Harvington Parish Council
Harborough Magna Parish Council
Harbury Parish Council
Hartshill Parish Council
Haseley Parish Council
Haselor Parish Council
Hatton Parish Council
Health Protection Agency - West Midlands
Hellidon Parish Council
Henley in Arden Parish Council
Herefordshire County Council
Highways Agency
Highways Agency
Higham on the Hill Parish Council
Hinckley & Bosworth Borough Council
Hints and Canwell Parish Council

Hockley Heath Parish Council
Hodnell & Wills Pastures Parish Council
Homes and Communities Agency (Birmingham Office)
Honiley Parish Council
Honington Parish Council
Horley Parish Council
Hornton Parish Council
Hunningham Parish Council
Hutchinson 3G UK Ltd
Idlicote Parish Council
Ilmington Parish Council
Inkberrow Parish Council
Kenilworth Town Council
Kineton Parish Council
Kingsbury Parish Council
Kingshurst Parish Council
King's Newnham Parish Council
Kilsby Parish Council
Kinwarton Parish Council
Ladbroke & Ufton Parish Council
Langley Parish Council
Lapworth Parish Council
Leamington Hastings Parish Council
Lea Marston Parish Council
Leek Wootton and Guys Cliffe Parish Council
Leicestershire County Council
Lichfield District Council
Lighthorne Parish Council
Lighthorne Heath Parish Council
Lilbourne Parish Council
Little Compton Parish Council
Little Lawford Parish Council
Little Wolford Parish Council
Long Compton Parish Council
Long Itchington Parish Council
Long Lawford Parish Council
Loxley Parish Council
Luddington Parish Council
Lutterworth Parish Council
Mancetter Parish Council
Marston Sicca Parish Council (Long Marston)
Marton Parish Council
Mappleborough Green Parish Council
Maxstoke Parish Council
Merevale Parish Council
Meriden Parish Council
Mickleton Parish Council
Middleton Parish Council
Milcote Parish Council
Mobile Operators Association
Mollington Parish Council
Monks Kirby Parish Council
Mono Consulting (acting on behalf of Orange)
Moreton in Marsh Parish Council

Moreton Morrell Parish Council
Morton Bagot, Oldberrow & Spernall Parish Council
Moxhull Parish Council
Napton on the Hill Parish Council
National Trust
Natural England
Natural England
Natural England
Nether Whitacre Parish Council
Newbold Pacey Parish Council
Newton and Biggin Parish Council
Newton Regis & Seckington Parish Council
Network Rail
North & Middle Littleton
North Warwickshire Borough Council
North West Leicestershire District Council
Northamptonshire County Council
Norton Lindsey Parish Council
Nuneaton & Bedworth Borough Council
Offchurch Parish Council
Oldberrow Parish Council
Old Milverton Parish Council
Old Stratford & Drayton Parish Council
O2
Over Whitacre Parish Council
Oxfordshire County Council
Oxhill Parish Council
Pailton Parish Council
Pebworth Parish Council
Pillerton Hersey Parish Council
Pillerton Priors Parish Council
Polesworth Parish Council
Preston Bagot Parish Meeting
Preston on Stour Parish Council
Princethorpe Parish Council
Priors Hardwick Parish Council
Priors Marston Parish Council
Quinton Parish Council
Radbourne Parish Council
Radford Semele Parish Council
Radway Parish Council
Ratley & Upton Parish Council
Redditch Borough Council
Rollright Parish Council
Rowington Parish Council
Royal Leamington Spa Town Council
Rugby Borough Council
Rugby PCT
Ryton on Dunsmore Parish Council
Salford Parish Council
Salford Priors Parish Council
Sambourne Parish Council
Sandwell Metropolitan Borough Council
Seckington Parish Council

Severn Trent Water
Sharnford Parish Council
Shawell Parish Council
Sheepy Parish Council
Shenington with Alkerton Parish Council
Sherbourne Parish Council
Shilton Parish Council
Shipston on Stour Town Council
Shropshire County Council
Shotteswell Parish Council
Shrewley Parish Council
Shuckburgh Lower & Upper Parish Council
Shustoke Parish Council
Shuttington Parish Council
Sibford Gower Parish Council
Smith's Wood Parish Council
Snitterfield Parish Council
Solihull Metropolitan Borough Council
South Northamptonshire County Council
South Warwickshire Environmental Association
South Warwickshire General Hospitals NHS Trust
South Warwickshire Primary Care Trust
Southam Town Council
Spernall Parish Council
Staffordshire County Council
Stratford on Avon District Council
Staverton Parish Council
Stockton Parish Council
Stoneleigh & Ashow Parish Council
Stoneton Parish Council
Stourton Parish Council
Stratford upon Avon Town Council
Stretton Baskerville Parish Council
Stretton-on-Dunsmore Parish Council
Stretton on Fosse Parish Council
Stretton under Fosse Parish Council
Studley Parish Council
STW
Sutton-under-Brailes Parish Council
T-Mobile
Tamworth Borough Council
Tanworth in Arden Parish Council
Telford & Wrekin District Council
Temple Grafton Parish Council
Thames Water Property
The Coal Authority
Thorpe Constantine Parish Council
Thurlaston Parish Council
Tidmington Parish Council
Todenham Parish Council
Tredington Parish Council
Tysoe Parish Council
Twycross Parish Council
Ufton Parish Council

Ullenhall Parish Council
Ullersthorpe Parish Council
University Hospitals Coventry & Warwickshire
Upton Parish Council
Vodafone Ltd
Warwickshire Association of Local Councils (WALC)
Walsall Metropolitan Borough Council
Wappenbury Parish Council
Warmington & Arlescote Parish Council
Warwick District Council
Warwick Town Council
Warwickshire PCT
Wasperton Parish Council
Watergall Parish Council
Water Orton Parish Council
Weethley Parish Council
Welford on Avon Parish Council
Wellesbourne Parish Council
Weston on Avon Parish Council
Weston under Wetherley Parish Council
West Oxfordshire District Council
West Midlands Strategic Health Authority
West Northamptonshire Joint Planning Unit
Whatcote Parish Council
Whichford Parish Council
Whitchurch Parish Council
Whitnash Town Council
Wibtoft Parish Council
Wigston Parva Parish Council
Willey Parish Council
Willoughby Parish Council
Wilmcote Parish Council
Wishaw Parish Council
Witherley Parish Council
Withybrook Parish Council
Wixford Parish Council
Wolfhampcote Parish Council
Wolston Parish Council
Wolverhampton City Council
Wolverton Parish Council
Wolvey Parish Council
Wootton Wawen Parish Council
Worcestershire County Council
Wormleighton Parish Council
Wroxhall Parish Council
Wychavon District Council
Wythall Parish Council

Government Departments

DFT (English Regions
Manager)
National Planning Casework
Unit

General Consultancy Bodies

Activ-Age Unit
Activities Group
African Carribean Project
Ahmadiyya Muslim Association
Alliance Planning
Ansty Pensioners' Group
Asian Community Equality Centre
Asian Girls Group
Asian Women - Active in Leisure
Atherstone Over 55's Club
Atherstone Pensioners Convention
Babe Ke Gurdwara
Baptist Family Group
Benn Partnership Centre
Brooke Court Residents Association
Brinklow Friendship Club
Buccaneers
BME Network
Care & Repair (Warwick)
Rugby Chinese Society
Citizens Advice Bureau - Bedworth
Civil Service Pensioner's Alliance
Coleshill & District Ladies Probus Club
CORE Rugby Forum
Council of Disabled People
Coventry and Warwickshire Learning Partnership
Crescent Youth Club
Darby & Joan Club (Southam)
Darby & Joan Club (Dordon)
Darby & Joan Club (Bidford)
Darby & Joan Club (Stratford)
Dickens Club
Dunchurch & Thurston Over 60s Club
Extend
Fusion on-line Limited
Gujarati Cultural Association
Gurdwara Sahib Leamington & Warwick
Gurdwara
Gurdwara
Garden Organic Ryton
Henley in Arden Evergreen Club
Henna Muslim Womens Group
Hill Street Youth and Community Centre
Hindu Sevika Samiti
Indian Association
Indian Workers Association
IWA
Indoor Bowls
Inter Community Organisation
Inland Waterways Association
Kenilworth Senior Citizens Club
Kenilworth Society
Khalsa Sports Club

Khalifa Cricket Club
Leamington Society
Masjid & Muslim Community Centre
Mela
MENCAP
Mercian Housing Association
Milan Multicultural Group
Milan Project
MILAAP
Mulberry Street Club
Muslim Community Association
Muslim Women's Group
Nachda Punjab
North Warwickshire Older People's Forum
Nuneaton and Bedworth Older People's Forum
Nuneaton & Bedworth Khalifa Muslim Society
Nuneaton & Bedworth Women's Multicultural Resource Centre
Nuneaton Civic Society
Nuneaton All Stars
Orbit Heart of England Housing Association
Over 50s Keep Fit Club
Pakistani Welfare Association
Pakistani Welfare Association
Public & Patient Involvement Forum Support Organisation
Racing Club Warwick
Rajput Council
Roots & Culture Club
Rowan Organisation
Rugby Centre for Indian Classical Music
Rugby Mosque Society
Rugby West Indian Association
Salvation Army Over 60s Club
SATKAAR Asian Elders Day Care Services
SCAN - Stratford
Senior Citizens Club Emscote
Sikh Community Elderly Men's Club
Sikh Community Association
Sikh Social & Welfare Association
Shree Hindu Gujarati Samaj
Shree Krishna Community Centre
Sikh Mission Centre
Sikh Women's Association
Silver Surfers Project
South Warwickshire Housing Association
Sri Guru Tegh Bahadur Gurdwara
Stratford on Avon Society
Stretton Over 60s Club
Sydenham Neighbourhood Initiative
Thursday Club
University of the Third Age Rugby
University of the Third Age Stratford
Warwick District Senior People's Forum
Warwickshire Association for the Blind
Warwickshire Association of Youth Clubs

Warwickshire Clubs for Young People
Warwickshire College
Warwickshire Federation Of Women's Institutes
Warwickshire Police
Warwickshire Rural Community Council
Warwickshire Rural Housing Association
Warwick Society
Warwickshire Wildlife Trust
Voluntary Action (Stratford upon Avon)
Warwickshire Community and Voluntary Action (Nun & Bed)
Warwickshire Community and Voluntary Action (Warwick)
Warwickshire Community and Voluntary Action (Rugby)
Warwickshire Community and Voluntary Action (North Warks)
WCVYS
West Indian Ladies Association
Whitstone Luncheon & Over 60s Club
Young at Heart

Other Consultees

Age Concern Warwickshire
Ancient Monuments Society
Arts Council West Midlands
Birmingham International Airport
British Chemical Distributors and Traders Association
British Geological Survey
British Pipeline Agency
British Waterways
CABE Inclusive Environment Group
Centre for Ecology and Hydrology
CENTRO
Chamber of Commerce
Chiltern Railway
Colliers CRE
Commission for Racial Equality
Council for the Protection of Rural England
Coventry Cathedral & Diocesan Office
Coventry Friends of the Earth
Cotswold Conservation Board
CPRE Regional Policy Officer
Crown Estate Office
Diocesan Board of Finance
DRC London Office
English Partnerships
E.On UK PLC
Forestry Commission
Forestry Commission
Freight Transport Association
Gypsy Council
Gypsy & Traveller Law Reform Coalition
Health & Safety Executive
John Earle and Son Chartered Surveyors
National Trust (Area Manager for Warks)
Nottingham East Midlands Airport
Nuneaton & District Friends of the Earth

Orbit Group
Regional Housing Board
Regional Sports Board
Road Haulage Association
Royal Society for the Protection of Birds
Rugby Friends of the Earth
Sport England
Stagecoach
Stratford-on-Avon Friends of the Earth
Stratford-on-Avon Police Station
Stephen Bowley Planning Consultancy
Sustainable Rugby Management Committee
Sustainable Rugby Working Group
The Georgian Group
The Geological Society
The Society for the Protection of Ancient Buildings
The Victorian Society
The Twentieth Century Society
The Warwickshire Geological Conservative Group
Travel West Midlands
University of Warwick
Virgin Rail
Warwick Police Station
Action 21
West Midlands Friends of the Earth
Women's National Commission
Warwickshire Rings
Warwickshire Wildlife Trust
Derbyshire Gypsy Liaison Group

Waste General

A M Skips
Abbott Josephine
ABS Skip Hire
Acres Mr J
Aggregate Industries UK Ltd
Alderson Ms
Alliance Environment and Planning Ltd
ALP Ambrose
Ancient Monuments Society
Appleby Mr Nigel
Arbury Estate
Art Club
Arup
Atherstone Civic Society
Atkins
Atkinson Mr M
Avis Ms C
Axis
Badham Mr A
Barker Iain
Barton Willmore
Beard Ms
Beaver Metals

Bennett Ms
Biddle (Mr)
Biffa Waste Services Ltd
Biffa Waste Services Ltd
Bird Mr
Black Mr
Blenkinson Mr JE
Bostock Mr P
Bowers Ms
Bratchie Ms
Brett Group
Brian Hall Planning Services
Bridgewater
The Brick Development Association
Briggs Mrs
Brinklow Quarry
British Aggregates Association
British Cement Association
British Marine Federation
British Pipeline Agency Ltd
British Stone
Bromley Mr Peter
Brown
Building Sustainable Neighbourhoods
Bundy Waste Management
Buswell
Butterfly Conservation
Callaghan Ms Carol
Canalside Yard
Carter Mr A L
Cemex UK Operations Ltd
Cemex UK Operations Ltd
Cemex UK Operations Ltd
Cemex UK Operations Ltd
Centro
Cesterover Farm
Chartered Institution of Wastes Management
Chartered Institution of Water and Environmental
Management
Chestnut House
Civil Service Retirement Fellowship
CL Voelcker
Clews Recycling
CoalPro
Coleman & Co Ltd
Coleman Mr
Collerson Mr Howard
Confederation of British Industry
Cook Mr Alan
Cope's of Earlswood
Corylus
Cory Environmental (Central) Ltd
Council for British Archaeology
Councillor Jane Corbett

Councillor Tony Wolfe
Country Land & Business Association
Coventry & Solihull Waste Disposal Ltd
Coventry & Warwickshire Learning Ptnership
Crestwood Environmental
Crichton
Critchlow H
Cross Hands Landfill Site
Crowley Mr
Crowley Ms
Crown Waste Services
CSWP Limited
Cubitt Mr Rq
Cullen Mr & Mrs
CWIKSKIP
David Jarvis Associates
De Mulder & Sons Ltd
Defence Estates
Dickinson Dees
Doherty Skip Hire
DPDS Consulting Group
Drinkwater Mr
Drivers Jonas
DTZ Pieda Consulting
Dunsford Mr
Dunton Mike
EASCO
Ecorys UK
Edwards Ms
Edward Mr
Ennstone Johnstone
Entec UK Ltd
Environmental Services Association
European Metal Recycling
Evans Mr John
Everitt Ms
Farthing Mr GS
Federation House
Federation of Small Businesses
Fernando Ms
Filmer Iris
Fletcher Mrs Kascinta
Flexdart Ltd
Forrest Mr
FPD Savills
Framptons
French Mr Peter
Friends of the Earth (Nuneaton)
FTMins Limited
Fullwood Mr P
Gale Cllr L
Galley Mr P
George Wimpey West Midlands Ltd
Gill Santosh

Gooding Mr R
Goods Again
Gordon Wood and Company Chartered Surveyors
Councillor A Gordon
Green Mr
Green Ms G
Green Party
Griffiths Jane
GD Environmental on behalf of Lichen Renewal
GVA Grimley
GP Planning Ltd
H W Martin Waste
Halletec
Hammond Recycling
Hanson Aggregates
Harbury Lane Breakers & Dismantlers Ltd
Harman Mr Derek
Harrison Mr Terry
Harris Lamb Planning Consultancy
Hart L
Hasener Mr Paul
Hastie
Hazardous Installations Directorate
Head of Construction
Heart of England Group
Heads Mrs
Hermes House
Hill Mr
HLL Humberts Leisure
Hodges Miss
Holland Ms Melanie
Holland Ms
Holmes Ms
Housing & Environmental Health
Howkins and Harrison
Hyder Consulting (UK) Ltd
HW Martin Waste Ltd
Institute of Civil Engineers
Institute of Waste Management
Jackson Mr
Jaguar, Landrover
JEWSON Depot
Job Centre Plus
Johnson
Johnson Mrs
Kent Mr & Mrs
Khozoui Pouri
King Mr
King Sturge
Knight Ms Jean
Kondakor
KSD Haulage
Lafarge Aggregates Ltd
Lampitt Mr J

Lavis Mr
Lewis Mr W J
Line Sue
Little Bourton Garage
Lowe Ms
Lower Huncote Farm
MADE (Midlands Architecture & the Designed Environment)
Mann Mr S
Marks Mr A
Marsh UK Ltd
Martin Bramich Associates
Mason Richards Planning
McCarthy Mr WP
McDonald Mr
Meade Ms
Merchant House
Merevale & Blythe Estates
Midland Quarry Products
Midlands Environmental Business Company
Milaap Group
Minerals, Waste Management & Environmental Consultancy
Minerals Processing Engineer
Mistry Mr I
Monitoring & Control Services Ltd
Murphy Mr J V
Nailor Mrs
National Childminders Association
National Farmers Union
New Earth Solution Ltd
New Ms N
Nuneaton Civic Society
Oak Tree Court
Owen Vaughan
Oxford Ms
P & G Losh
Packington Estate Enterprises
Pain P A
Pallikaropoulos
Peel Ms
Permitting and Planning Interface Consultation
Phillips
Portland Planning Consultants Ltd
Powergen CHP
Powell Ms Lynne
Pritchard Mr Chris
Quince Mr D E
QSP Ltd
R.A Newman & Sons
Radford Mrs
Ragley Estate
Ramblers' Association Main Office
RASE
Ratcliffe Mr
Reading Ms V

Redford WWA
Reid Architecture
Rendell
Renewable UK
RICS Contact Centre
Ripon Cottage
RMC Aggregates (Western)
ROBA Metals Ltd
Robert Brett & Sons Ltd
Rock Cllr
Rouse Mr
Salam Mr A
Sangster
Sayed El
Serviceteam Ltd
Serruys Property Company Ltd
Seville Ms Pamela
Simpro Ltd
Sims Group
Singh Mejar
Singh Mr
Singh Rattan
SITA UK
SITA UK
Slater Mr M
Smallbrook Environmental Business Consultancy
Smith & Sons (Bletchington) Limited
Smith Cllr Philip
Smith Mr M
Smith Stuart Reynolds
Smiths Concrete
Smith Concrete Ltd
Soil Association
South Warwickshire Carers Support Service
Sport England West Midlands
Spragg Mr
Spruth Ms Michelle
St Albans Court
Stafford Mr W
Stanley Ms
Stansgate Planning Consultants LLP
Steel Mr and Mrs A
Stephenson Mrs
Stephen Bowley Planning Consultancy
Stevens Mr
Stock Rev
Stockton Fields Farm
Stone Roger
Stoneleigh Planning Partnership
Stratford Car Breakers
Stratford on Avon Society
Stratford-upon-Avon College
Tarmac Central Ltd
The British Horse Society

The Garden Society
The Georgian Group
The National Archives
The New Ramsden Centre
The Polesworth Society
The Prince's Trust
The Society for the Protection of Ancient Buildings
The Stone Federation
The Techno Centre
The Twentieth Century Society
The Tyler-Parkes Partnership
The Victorian Society
The Willetts Partnership
Thelsford Farm
Thomas Mr WL
Thomas
Thorpe Anthony
TJ Composting Group
TNT
Tompkins
Towson Jocelyn
Tree Tops
Trinder Auto Spares
Truckbusters (Rugby) Ltd
Turley Associates
Turner Mrs A
Tyseley Waste Disposal Ltd
Unison
UK Coal
UK Producing Coal Industry
UWSPCo
Vaughton Mr
Veolia Environmental Services Birmingham Ltd
Veolia Environmental Services PLC
Verdant
Verdult Mr John
Viridor Waste Management Ltd
Virk Mrs
Wainscot Ms
Walker Ms
Walnut Hill Farm
Walsh Ms
Wardell Armstrong LLP
Warner
Warwick Racing Club SC Club
Warwickshire College
Warwickshire Association of Youth Clubs
Warwickshire Clubs for Young People
Warwickshire Federation of YFCs
Warwickshire Geological Conservation Group
Warwickshire Museum
Warwickshire Police Authority
Warwickshire Police Authority
Warwickshire Rings

Warwickshire Specialist Health Promotion Service
Wasperton Hill Farm
Waste Recycling Group
Waste Recycling Group
Watts Rugby Ltd
Waystone Limited
Weir Waste Services
White Young Green Planning
Whites of Coventry Ltd
Whitmore M
Whitnash Parish Council
Williams Mr & Mrs
Wilson Motor Spares & Services
Wilson Ms
Wood Frampton Limited
Woodfields
Woodland Trust
Wootton Grange
WS Atkins Planning Consultants
Wyatt Mrs Patricia
Wyvern
Young Mr & Mrs
Young Mr Peter
Miller Ms Anna
Darrie Ms Maureen
Mr. Carnaby

Appendix E: List of representations and Officer Comments

Preferred Option and Policies Consultation, September 2011

Full Name	Organisation Details	Type	Number	Full comment	Officer response
Mr David Berry	Coal Authority - Planning Liaison Manager	section	1	<p>BACKGROUND ON THE COAL AUTHORITY The Coal Authority is a Non-Departmental Public Body sponsored by the Department of Energy and Climate Change (DECC). The Coal Authority was established by Parliament in 1994 to undertake specific statutory responsibilities associated with the licensing of coal mining operations in Britain; handle subsidence claims which are not the responsibility of licensed coalmine operators; deal with property and historic liability issues and provide information on coal mining. The Coal Authority re-engaged with the three planning systems across England, Scotland and Wales. The main areas of planning interest to The Coal Authority in terms of policy making relate to: <ul style="list-style-type: none"> the safeguarding of coal as a mineral in accordance with the advice contained in MPS1 and MPG3 in England; and ensuring that future development is undertaken safely and reduce the future liability on the tax payer for subsidence and other mining related hazards claims arising from the legacy of coal mining in accordance with the advice in PPG14 and MPG3 in England. </p> <p>BACKGROUND TO COAL RELATED ISSUES IN WARWICKSHIRE</p> <p>Surface Coal Resources, Energy Minerals and Prior Extraction As you will be aware, the Warwickshire area contains coal resources which are capable of extraction by surface mining operations. Information on the extent of these resources is available to Planning Authorities free of charge from The Coal Authority following signing a data sharing licence/memorandum of understanding and was given to Warwickshire County Council in August 2009. The Coal Authority is keen to ensure that coal resources are not unduly sterilised by new development. In cases where this may be the case, The Coal Authority would be seeking prior extraction of the coal. Prior extraction of coal also has the benefit of removing any potential land instability problems in the process. Contact details for individual operators that may be able to assist with coal extraction in advance of development can be obtained from the</p>	

			<p>Confederation of Coal Producersâ€™ website at www.coalpro.co.uk/members.shtml.</p> <p>Coal Mining Legacy</p> <p>As you will also be aware, the Warwickshire area has been subjected to coal mining which will have left a legacy. Whilst most past mining is generally benign in nature, potential public safety and stability problems can be triggered and uncovered by development activities. Problems can include collapses of mine entries and shallow coal mine workings, emissions of mine gases, incidents of spontaneous combustion, and the discharge of water from abandoned coal mines. These surface hazards can be found in any coal mining area, particularly where coal exists near to the surface. The Coal Authority defines areas where these legacy issues may occur. The Coal Authority has records of over 171,000 coal mine entries across the coalfields, although there are thought to be many more unrecorded. Shallow coal which is present near the surface can give rise to stability, gas and potential spontaneous combustion problems. Even in areas where coal mining was deep, in some geological conditions cracks or fissures can appear at the surface. It is estimated that as many as 2 million of the 7.7 million properties across the coalfields may lie in areas with the potential to be affected by these problems. In our view, the planning processes in coalfield areas need to take account of the coal mining legacy issues. The principal source of guidance is PPG14, which despite its age still contains the science and best practice on how to safely treat unstable ground. Within the Warwickshire area there are over 700 recorded mine entries and 7 coal mining related hazards have been reported to The Coal Authority. Mine entries may be located in built up areas, often under buildings where the owners and occupiers have no knowledge of their presence unless they have received a mining report during the property transaction. Mine entries can also be present in open space and areas of green infrastructure, potentially just under the surface of grassed areas. Mine entries and mining legacy matters should be considered by the Local Planning Authority to ensure site allocations and other policies and programmes will not lead to future public safety hazards. Although mining legacy is as a result of mineral workings it is important that new development recognises the problems and how they can be positively addressed. However, it is important to note that land instability and mining legacy is not a complete constraint on the new development; rather it can be argued that because mining legacy matters have been addressed the new development is safe, stable and sustainable.</p>	
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Mr David Berry	Coal Authority - Planning Liaison Manager	section	9	<p>Representation No.1 Do you agree with these Development Management policies (policies DM1-DM8) and what are the reasons for your view? Are there any other policies that you feel need to be included? â€œ</p> <p>TEST OF SOUNDNESS Justified X Effective Consistent with National Policy X</p> <p>Objection - As outlined above, parts of Warwickshire are affected by the legacy of former coal mining activity and there is therefore the potential for land instability and other public safety issues within the plan area. This will need to be taken into account and addressed by proposals for new waste management facilities in accordance with PPG14 (Development on Unstable Land). In addition, there are surface coal resources within the plan area and, in line with the guidance in MPS1 (Planning and Minerals), it is necessary to ensure that these are not sterilised unnecessarily by new waste developments. Where it is necessary for the development of new waste management facilities to take place in areas of surface coal resource, consideration should be given to whether the coal resource could be extracted in advance of the development. For the reasons outlined above, The Coal Authority considers that the Waste Core Strategy should incorporate appropriate policies / policy criteria to ensure that new waste management facilities take into account and address any coal-mining related land instability and other public safety issues. In addition, the plan should include appropriate policies / policy criteria to ensure that, where new waste management facilities are proposed within areas of surface coal resource, consideration is given to the prior extraction of the resource. Without such policies / policy criteria, The Coal Authority considers that the Warwickshire Waste Core Strategy fails to comply with national policy guidance and in therefore UNSOUND.</p> <p>Reason - To meet the requirements of PPG14 (Development on Unstable Land) and MPS1 (Planning and Minerals).</p> <p>CONCLUSION The Coal Authority welcomes the opportunity to make these comments. We are, of course, willing to discuss the comments made above in further detail if desired and would be happy to negotiate suitable wording to address any of our concerns. The Coal Authority also wishes to continue to be consulted both informally if required and formally on future stages. Thank you for your attention.</p>	
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Fiona Blundell	Warwick District Council	section	1	Please note that due to an administrative error, the response has not yet been discussed by members of the Executive and is therefore officer comments only until such time as members are able to ratify the report. Apologies for this further delay.	Noted
Fiona Blundell	Warwick District Council	section	5	It was queried in the response to the previous consultation why, in order that the aims of the SCS are met, there is no objective in relation to using the waste development framework to address inequalities that exist by geography in the county. This has still not been specifically addressed.	It is well recognised that equalities are an issue for Warwickshire but this is not a matter for the waste core strategy to address
Fiona Blundell	Warwick District Council	section	8	Core Strategy Policy 2 (CS2) states that preference will be given to proposals for waste management facilities where they do not have 'adverse impacts upon statutory designated features of natural or built environment and do not have a significant adverse impact upon communities'. There is no definition suggested as to what would constitute an 'adverse impact' or a significant adverse impact'. It would be helpful to give some idea as to what this may mean by reference to an example of the criteria that may be utilised in respect of either for clarity. It should be noted that the District Councils do have an impact on the waste infrastructure required, as they determine waste collection policies, and vice versa. Once long term disposal contracts have been agreed, altering the local collection policy has a very significant financial impact. To what degree will capacity of waste disposal facilities be considered, which may impact on transport networks with waste being imported from surrounding areas, if there is insufficient waste produced locally to make a facility viable? It is suggested that in order to provide a complete set of policies for the Core Strategy, a policy could be incorporated that deals with uses of sites that become redundant or unsuitable for purpose during the life of the Strategy. There will be limitations on the uses to which such sites could be put and it would be useful to suggest how these could be approached and what may be acceptable. Likewise, allocated sites may prove not to be required. If this is the case, land could be released for other uses and monitoring should look at this as a possibility. Whilst there are a number of references to climate change, these are all identified as negative effects or as factors which may reduce the impact on climate change rather than promoting a positive approach to negating or even improving the situation through new and advancing technologies and the introduction of positive policies. Such policies would positively support the aims of the SCS. Could smaller facilities be used on new residential sites for waste disposal/waste generation? Is there any consideration of new initiatives which could deal with on site disposal on a very local, small scale? How does this strategy fit in with other sub-regional strategies/waste disposal provision, and national waste disposal provision? In addition to the Core	Will be addressed through the application process

				<p>Strategy Policies, a further eight Development Management Policies are proposed. These policies give specific guidance to those seeking planning permission for waste site development. A separate list details the information required in support of such an application.</p>	
Ms L Brockett	Redditch Borough Council	section	1	<p>Thank you for providing Redditch Borough Council with the opportunity to respond to the above consultation. We support the Policies contained within the draft document and do not have any further detailed comments to make at this time.</p>	Noted

Kathryn Burgess	Highways Agency - Assistant Asset Manager	statement	Objective 3	We welcome Key Objective 3 which is to "Ensure that new waste developments are steered towards the most sustainable and accessible locations, proximate to waste arisings and using the most sustainable transport mode to minimise the distances waste is transported by road". However we would suggest that the objective could be strengthened by slightly altering the wording to read "Ensure that new waste developments are located in the most sustainable and accessible locations".	<u>Noted and can confirm that the objective will be strengthened in line with your suggestion.</u>
Kathryn Burgess	Highways Agency - Assistant Asset Manager	section	8	General Comments We note that Spatial Option 5 has been selected to be taken forward as the as the basis for consultation on a preferred spatial option, in our response at the Emerging Spatial Options consultation earlier this year the Highways Agency advised that we could see the benefits of spatial options 4 and 5. In our response we explained that we were concerned that one of the advantages identified in relation to option 5 was that the primary settlements are served by transport routes such as the A45/A46 axis and this may result in a detrimental impact on the strategic road network (SRN). The HA therefore welcomes the fact that this draft policy that seeks to maximise the use of sustainable transport systems and minimise the distance, as much as possible, between where waste is generated and where it is treated. Thus minimising the need for transportation by road. In general the HA favours the location of facilities that will have the least impact on the strategic road network (SRN). This is likely to include existing facilities and those on brownfield/industrial land where the type of traffic movements likely to be generated would be expected to be broadly similar to that which already exists. Circular 02/07: Planning and Strategic Road Network explains the Agency's role in the planning system and details how individual planning applications will be assessed. Paragraphs 41 - 42 of Circular the set out Government policy on new accesses onto the strategic trunk roads, there is general presumption against the provision of new accesses.	Noted
Kathryn Burgess	Highways Agency - Assistant Asset Manager	section	9	Paragraph 9.9 states that conditions may be imposed or agreements entered into in order to secure a list of measures. The list does not include access/ road improvements which may be necessary to improve safety or the operation of the road network; we would suggest that this is included.	Noted and will add the additional wording as suggested <u>access/ road improvements which may be necessary to improve safety or the operation of the road network</u>

Kathryn Burgess	Highways Agency - Assistant Asset Manager	box	Development Management Policy 3	In relation to Draft Development Management Policy 3, DM3 "Sustainable Transportation. The Agency supports the requirement that waste proposals must seek to use alternatives to road transport where feasible, it is our belief that more sustainable alternatives should always be considered first and not ruled out without good reason. We fully endorse the requirement that developers must demonstrate that there is no unacceptable adverse impact on the safety, capacity and use of the highway network. Where the policy states that a Transport Assessment (TA) will need to demonstrate that "The proposed development has direct access or suitable links to the routes set out on the Warwickshire Advisory Lorry Route map/ principal highway network". We would reiterate the policy restrictions in relation to the strategic road network outlined above. We support the requirements that the TA must demonstrate that the highway network is suitable to accommodate the additional number of movements and that the proposal not result in an unacceptable detrimental impact to road safety. The further requirement that sufficient mitigation works directly related to the development are identified in the TA and may need to be funded by the developer is also welcome. Paragraph 9.47 encourages applicants to undertake pre-application discussion with the Council to establish whether a TA is required. The Highways Agency would welcome this being extended to include where appropriate pre-application discussion with the Highways Agency. Similarly paragraph 9.49 states that travel plans are to be submitted alongside planning applications and that they should be produced in consultation with the local authorities and transport providers. Again we would recommend that where appropriate consultation is also sought from the Highways Agency.	Noted
Mrs R Buswell		question	Question 1	Yes	Noted
Mrs R Buswell		question	Question 2	Yes	Noted
Mrs R Buswell		policy	Core Strategy Policy 1	Yes	Noted
Mrs R Buswell		policy	Core Strategy Policy 2	Yes	Noted
Mrs R Buswell		policy	Core Strategy Policy 3	Yes	Noted
Mrs R Buswell		policy	Core Strategy Policy 4	Yes	Noted

Mrs R Buswell		policy	Core Strategy Policy 5	Yes	Noted
Mrs R Buswell		policy	Core Strategy Policy 6	Yes - The way forward is with this process, it gets rid of refuse and produces energy, far preferable to windfarms.	Noted
Mrs R Buswell		policy	Core Strategy Policy 7	Yes	Noted
Mrs R Buswell		policy	Core Strategy Policy 8	Yes - Very important to protect these sites well.	Noted
Mrs R Buswell		box	Development Management Policy 1	No - There should be NO development within the Green Belt, this should be sacrocant!	Noted and will be resisted but where there is already brownfield development within the Green Belt this may be acceptable.
Mrs R Buswell		box	Development Management Policy 2	Yes	Noted
Mrs R Buswell		box	Development Management Policy 3	Yes	Noted
Mrs R Buswell		box	Development Management Policy 4	Yes	Noted
Mrs R Buswell		box	Development Management Policy 5	Yes	Noted
Mrs R Buswell		box	Development Management Policy 6	Yes	Noted
Mrs R Buswell		box	Development Management Policy 7	Yes	Noted
Mrs R Buswell		box	Development Management Policy 8	No - Long term projects - reassurance should be given that land should be returned to its former state - i.e. green field back to green field, and not as often happens, green field to industrial estate.	Noted
Mrs R Buswell		question	Question 5	No	Noted

M Chant	Northamptonshire County Council	section	6	Thank you for consulting the county council on the above. As a waste planning authority we have comments in relation to hazardous waste provision. Northamptonshire County Council is encouraged by the statement "It is accepted that hazardous waste is a very specialised waste stream and whilst there should be policies to access such types of facility in Warwickshire, it must be recognised that as only relatively small amounts of hazardous waste are generated in each Waste Planning Authority, due to economies of scale a hazardous waste facility could be regional in nature, hence requiring importation of waste from other authorities" On the basis of this statement Northamptonshire County Council consider that a specific policy containing criteria on which proposals for radioactive waste treatment/disposal would be determined should be included within the DPD. Northamptonshire County Council would also like to see reference made to radioactive waste and would like to see a policy on this waste type included in the DPD. If you require clarification of the above comments please do not hesitate to contact me.	<u>Noted and consideration will be given as to whether your suggestion has merit</u>
Parish Councillor David Collins	Stretton under Fosse Parish Council	question	Question 1	Yes	Noted
Parish Councillor David Collins	Stretton under Fosse Parish Council	question	Question 2	Yes	Noted
Parish Councillor David Collins	Stretton under Fosse Parish Council	policy	Core Strategy Policy 1	Yes - I can add nothing to paras 8.1 - 8.3.	Noted
Parish Councillor David Collins	Stretton under Fosse Parish Council	policy	Core Strategy Policy 2	Yes - Again as set out in paras 8.4 - 8.7.	Noted
Parish Councillor David Collins	Stretton under Fosse Parish Council	policy	Core Strategy Policy 3	Yes - As set out in paras 8.8 - 8.10.	Noted
Parish Councillor David Collins	Stretton under Fosse Parish Council	policy	Core Strategy Policy 4	Yes - There is already a waste site within Rugby.	Noted
Parish Councillor	Stretton under Fosse Parish	policy	Core Strategy	Yes - Paras 8.12 in particular and 8.13.	Noted

David Collins	Council		Policy 5		
Parish Councillor David Collins	Stretton under Fosse Parish Council	policy	Core Strategy Policy 6	Yes - Paras 8.14 and 8.15 sufficient.	Noted
Parish Councillor David Collins	Stretton under Fosse Parish Council	policy	Core Strategy Policy 7	Yes - As set out in paras 8.16 to 8.19.	Noted
Parish Councillor David Collins	Stretton under Fosse Parish Council	policy	Core Strategy Policy 8	Yes - 8.20 cannot be expanded.	Noted
Parish Councillor David Collins	Stretton under Fosse Parish Council	box	Development Management Policy 1	Yes - I cannot add to paras 9.16 to 9.29.	Noted
Parish Councillor David Collins	Stretton under Fosse Parish Council	box	Development Management Policy 2	Yes - Again paras 9.30 to 9.43.	Noted
Parish Councillor David Collins	Stretton under Fosse Parish Council	box	Development Management Policy 3	Yes - 9.44 to 9.50 are comprehensive.	Noted
Parish Councillor David Collins	Stretton under Fosse Parish Council	box	Development Management Policy 4	Yes	Noted
Parish Councillor David Collins	Stretton under Fosse Parish Council	box	Development Management Policy 5	Yes - As set out in paras 9.54, 9.55, 9.56, 9.57 particularly significant, and 9.58.	Noted
Parish Councillor David Collins	Stretton under Fosse Parish Council	box	Development Management Policy 6	Yes - I can add nothing to paras 9.59 to 9.65.	Noted
Parish Councillor David Collins	Stretton under Fosse Parish Council	box	Development Management Policy 7	Yes	Noted
Parish Councillor	Stretton under Fosse Parish	box	Development Management	Yes - I cannot add to paras 9.68 to 9.70.	Noted

David Collins	Council		Policy 8		
Parish Councillor David Collins	Stretton under Fosse Parish Council	question	Question 5	No	Noted
Mr Alan Cook		question	Question 1	Yes	Noted
Mr Alan Cook		question	Question 2	Unsure - Obj 3 - steering waste to most accessible locations - rail links must be considered not just road links. Carbon footprint on congested roads if serious eg. Nuneaton ring road.	Noted and addressed in Development Management Policy 3
Mr Alan Cook		policy	Core Strategy Policy 1	Unsure - RSS has been revoked? Under RDA closures.	It still has to be revoked although it is inevitable that it will be but the technical studies to support remain as the best evidence to date.
Mr Alan Cook		policy	Core Strategy Policy 2	Unsure - Many quarries in N.Warks are hard rock, highly jointed, fissured. Sealing them has proved expensive and difficult. There are globally important geology features in Nuneaton - Atherstone quarries.	Agreed and noted but landfill engineering techniques have improved over the years and will continue to do so
Mr Alan Cook		policy	Core Strategy Policy 3	No - Quarries in N.Warks do not have rail connections and existing road access to most are B, C or D road status. Traffic and carbon footprint and pollution CO NOX gases.	This policy is aimed at ensuring that waste is managed as close to its arisings as possible
Mr Alan Cook		policy	Core Strategy Policy 4	Yes	Noted
Mr Alan Cook		policy	Core Strategy Policy 5	Yes	Noted
Mr Alan Cook		policy	Core Strategy Policy 6	Yes	Noted

Mr Alan Cook		policy	Core Strategy Policy 7	Yes - Prevailing wind from S.West 3 days and 5 days 60%. Down wind suburbs need to be considered. Above ground tank storage requires protective bunds to capture/retain soils or leaks. See Appra BS EN 1992-3.	Noted
Mr Alan Cook		policy	Core Strategy Policy 8	Yes	Noted
Mr Alan Cook		box	Development Management Policy 1	Yes	Noted
Mr Alan Cook		box	Development Management Policy 2	Yes	Noted
Mr Alan Cook		box	Development Management Policy 3	Yes	Noted
Mr Alan Cook		box	Development Management Policy 4	Yes	Noted
Mr Alan Cook		box	Development Management Policy 5	Yes	Noted
Mr Alan Cook		box	Development Management Policy 6	Yes	Noted
Mr Alan Cook		box	Development Management Policy 7	Yes	Noted
Mr Alan Cook		box	Development Management Policy 8	Yes	Noted
Mr Alan Cook		question	Question 5	Yes - 3.19 Environment. There will be an increase in 3.20 LGS (Local) and hopefully upgrade of 3.2. Several LGS in N Warks to SSSI. The Nuneaton - Hartshill - Oldsbury ridge is a very important landscape feature. There are initiatives via Warw geol cons group and others to create an area of geological/geomorphological importance.	Noted

Mr N Cox	Lichfield District Council	section	1	I would like to advise you that in relation to the whole document I have no comments to make on behalf of Lichfield District Council.	Noted
Dr David Custance	Idlicote Parish Council	question	Question 1	Yes	Noted
Dr David Custance	Idlicote Parish Council	question	Question 2	Yes	Noted
Dr David Custance	Idlicote Parish Council	policy	Core Strategy Policy 1	Yes - The principle is correct but it will need careful monitoring to ensure it is operated effectively.	Noted
Dr David Custance	Idlicote Parish Council	policy	Core Strategy Policy 2	Yes - It is important to limit the distance waste has to be transported from source to disposal. In this respect small scale waste development would be more acceptable in rural locations subject to no conflict with Development Management policies.	Noted
Dr David Custance	Idlicote Parish Council	policy	Core Strategy Policy 3	Yes - There should be a limit on the number of large scale waste sites in the County and the criteria for selecting those named in the document are correct.	Noted
Dr David Custance	Idlicote Parish Council	policy	Core Strategy Policy 4	Yes - Again, reducing transport of waste as far as possible is to be welcomed.	Noted
Dr David Custance	Idlicote Parish Council	policy	Core Strategy Policy 5	Yes - In principle re-use and recycling must be encouraged. However, storage of waste must not conflict with development management policies.	Noted
Dr David Custance	Idlicote Parish Council	policy	Core Strategy Policy 6	Yes - Again, an alternative to landfill is to be welcomed - provided that toxic and undesirable emissions are controlled and properly treated.	Noted
Dr David Custance	Idlicote Parish Council	policy	Core Strategy Policy 7	Yes - Landfill must be reduced as far as possible. It is vital that long-term effects are monitored to prevent build-up of gas and leachate.	Agreed

Dr David Custance	Idlicote Parish Council	policy	Core Strategy Policy 8	Yes - Any future development on sites close to existing waste facilities must give priority to waste management. This has to be enforced by the planning authority.	Agreed
Dr David Custance	Idlicote Parish Council	box	Development Management Policy 1	Yes - Great care must be taken with the preservation of heritage assets and Warwickshire's historic landscape. Small changes which may affect particular habitats can, over the long term, disrupt the biodiversity of an area irrevocably.	Noted
Dr David Custance	Idlicote Parish Council	box	Development Management Policy 2	Yes - The list of impacts seems generally inclusive. Suitable criteria will have to be developed to take account of the variation in tolerance to pollutants such as noise. If this management policy is to be effective, close monitoring will be essential.	Agreed
Dr David Custance	Idlicote Parish Council	box	Development Management Policy 3	Yes - Warwickshire is a rural county so it is not clear what alternatives there are to carry transport. What is vital is to ensure transport is related to the size of the highway used. Sat Nav devices have a habit of directing lorries along narrow roads which are not designed to accommodate them!	Noted
Dr David Custance	Idlicote Parish Council	box	Development Management Policy 4	Yes - The components of the policy include features which are desirable for any new facility - as long as they are fully implemented and not sacrificed in the interests of convenience!	Noted
Dr David Custance	Idlicote Parish Council	box	Development Management Policy 5	Yes - This is important - particularly the protection of open spaces. Perhaps there is too much leeway in favour of developers in the last sentence of the first paragraph.	Noted
Dr David Custance	Idlicote Parish Council	box	Development Management Policy 6	Yes - It is vital to protect the quality of water in the water table - liable to pollution from leachate.	Noted

Dr David Custance	Idlicote Parish Council	box	Development Management Policy 7	Yes - The potential increase in the number of birds around the waste disposal site is particularly significant.	Noted
Dr David Custance	Idlicote Parish Council	box	Development Management Policy 8	Unsure - There should be provision for a time limit to be associated with temporary planning permission. Temporary arrangements have a habit of becoming permanent unless controlled!	This is a matter for Development Control and not one that can be addressed through the core strategy
Dr David Custance	Idlicote Parish Council	question	Question 5	Yes - There seems to be no clear policy for monitoring these sites after planning permission has been given. A policy should be stated for periodic monitoring procedures.	Noted
Mr Peter Davies	Severn Trent Water Ltd	section	1	Thank you for giving Severn Trent Water the opportunity to comment on the Warwickshire Waste Core Strategy - Preferred Options document. Severn Trent has no specific issue to raise but wish to make the following points by way of general comment:- 1. Severn Trent Water considers that the proposals will not have a detrimental effect on groundwater quality; the Environment Agency Groundwater Source Protection Zone policy provides guidance on development. 2. The proposals will not have a detrimental impact on the water quality at water supply surface water abstraction sites, classified by the Environment Agency as surface water Drinking Water Protected Areas. They will not significantly impact on the water resources or natural surface water and groundwater flows. 3. They will not significantly impact on the biodiversity of groundwater supported systems ecosystems or surface water courses; they may even be designed to enhance biodiversity. The proposals should take into account the principles of Water Framework Directive and taking into account details summarised in the River Basin Management Plans as prepared by the Environment Agency. I trust the above comments are sufficient for you at this stage.	Noted
Mr Mike Dittman	North Warwickshire Borough Council	section	1	Please find attached the covering letter and supporting documents.	
Mr Mike Dittman	North Warwickshire Borough Council	question	Question 1	Yes	Noted
Mr Mike Dittman	North Warwickshire Borough Council	question	Question 2	Yes	Noted
Mr Mike Dittman	North Warwickshire Borough Council	policy	Core Strategy Policy 1	Yes	Noted

Mr Mike Dittman	North Warwickshire Borough Council	policy	Core Strategy Policy 2	Yes - with qualifications noted in the Board Report 17th October 2011 regarding Green Belt designations and the need to protect such areas from development, targeting brown field sites or sites within current development boundaries. The Strategy should also emphasise the need to look at cross boundary solutions, particularly where existing facilities exist that could accommodate or expanded to cater for growth, temporary or otherwise, without/rather than requiring new sites, particularly in Green Belt locations. In the case of the Coleshill area, many people use the Solihull MBC site at Bickenhill	Noted – With the duty to cooperate cross boundary solutions will take on greater importance and will need to be reflected in the core strategy.
Mr Mike Dittman	North Warwickshire Borough Council	policy	Core Strategy Policy 3	No - In particular it is the reference to close proximity (5km) of Coleshill which lies in the Green Belt. The Draft of the Preferred Option for the Borough's own Core Strategy strongly protects the Green belt and is concerned that although the Green belt is seen as a constraints in section 3 this does not seem to have stopped the inclusion of this policy steer.	The need to protect the green belt is recognised in the core strategy but some waste related activities can be appropriate for the green belt.
Mr Mike Dittman	North Warwickshire Borough Council	policy	Core Strategy Policy 4	Unsure - there may be the opportunity of combining this policy with the latter CS3 on large sites. The issues appear to be the same and the spatial location requirements are essentially the same. So why separate the two policies?	This proposed policy does allow for small developments outside of the primary settlements whereas CS3 specifically precludes this.
Mr Mike Dittman	North Warwickshire Borough Council	policy	Core Strategy Policy 5	Yes. Nevertheless, the Strategy should emphasise the need to look at cross boundary solutions, particularly where existing facilities exist that could accommodate or expanded to cater for growth without/rather than requiring new sites, particularly in Green Belt locations. In the case if the Coleshill area, many people use the Solihull MBC site at Bickenhill.	Noted – With the duty to cooperate cross boundary solutions will take on greater importance and will need to be reflected in the core strategy.
Mr Mike Dittman	North Warwickshire Borough Council	policy	Core Strategy Policy 6	Yes.	Noted
Mr Mike Dittman	North Warwickshire Borough Council	policy	Core Strategy Policy 7	Yes.	Noted
Mr Mike Dittman	North Warwickshire Borough Council	policy	Core Strategy	Yes.	Noted

			Policy 8		
Mr Mike Dittman	North Warwickshire Borough Council	box	Development Management Policy 1	Yes.	Noted
Mr Mike Dittman	North Warwickshire Borough Council	box	Development Management Policy 2	Yes.	Noted
Mr Mike Dittman	North Warwickshire Borough Council	box	Development Management Policy 3	Yes (Encouraging alternative transport options and discouraging use of Rural roads by heavy lorries, impacting on rural communities, is considered important).	Noted
Mr Mike Dittman	North Warwickshire Borough Council	box	Development Management Policy 4	Yes.	Noted
Mr Mike Dittman	North Warwickshire Borough Council	box	Development Management Policy 5	Yes.	Noted
Mr Mike Dittman	North Warwickshire Borough Council	box	Development Management Policy 6	Yes.	Noted
Mr Mike Dittman	North Warwickshire Borough Council	box	Development Management Policy 7	Yes.	Noted
Mr Mike Dittman	North Warwickshire Borough Council	box	Development Management Policy 8	Yes. Nevertheless, the Strategy should emphasise the need to look at cross boundary solutions, particularly where existing facilities exist that could accommodate or expanded to cater for growth, temporary or otherwise, without/rather than requiring new sites, particularly in Green Belt locations. In the case of the Coleshill area, many people use the Solihull MBC site at Bickenhill.	Noted – With the duty to cooperate cross boundary solutions will take on greater importance and will need to be reflected in the core strategy.
Mr Mike Dittman	North Warwickshire Borough Council	question	Question 5	Unsure, possibly clearer reference to Green Belt protection and retention in either existing proposed Policy Development Management Policy 1 or as a stand alone policy?	Noted – ‘Impact on the openness of the Green Belt’ will now be included as a consideration in Policy DM1 and further elaboration will be provided in the supporting text.
Mr. Clive	Principal Engineer	question	Question 1	Yes	Noted

Dorney	Jaguar Land Rover				
Mr. Clive Dorney	Principal Engineer Jaguar Land Rover	statement	Objective 1	Yes	Noted
Mr. Clive Dorney	Principal Engineer Jaguar Land Rover	statement	Objective 2	Yes - Strong support for 'self-sufficiency' principle	Noted
Mr. Clive Dorney	Principal Engineer Jaguar Land Rover	statement	Objective 3	Yes	Noted
Mr. Clive Dorney	Principal Engineer Jaguar Land Rover	statement	Objective 4	Yes	Noted
Mr. Clive Dorney	Principal Engineer Jaguar Land Rover	statement	Objective 4	Yes	Noted
Mr. Clive Dorney	Principal Engineer Jaguar Land Rover	statement	Objective 5	Yes	Noted
Mr. Clive Dorney	Principal Engineer Jaguar Land Rover	statement	Objective 6	Yes	Noted
Mr. Clive Dorney	Principal Engineer Jaguar Land Rover	statement	Objective 7	Unsure - Each site should be judged upon its merits, taking account of:- Current waste technologies on the site Proposed re-use Alternative facilities and capacities	This judgement will be made as part of the planning application process.
Mr. Clive Dorney	Principal Engineer Jaguar Land Rover	statement	Objective 8	Yes	Noted
Mr. Clive Dorney	Principal Engineer Jaguar Land Rover	question	Question 2	Yes	Noted
Mr. Clive Dorney	Principal Engineer Jaguar Land Rover	section	7	The selected option is supported as it provides maximum flexibility to reach the right solution going forward.	Noted
Mr. Clive Dorney	Principal Engineer Jaguar Land Rover	policy	Core Strategy Policy 1	Yes - Local self-sufficiency is necessary to contain transport impacts, encourage use, and make responsible waste management sustainable.	Noted
Mr. Clive Dorney	Principal Engineer Jaguar Land Rover	policy	Core Strategy Policy 2	Yes - Waste facilities should be located as close as possible to sources of generation to reduce transport impacts.	Noted
Mr. Clive Dorney	Principal Engineer Jaguar Land Rover	policy	Core Strategy Policy 3	Yes - Waste facilities should be located as close as possible to places of generation to reduce transport impacts.	Noted

Mr. Clive Dorney	Principal Engineer Jaguar Land Rover	policy	Core Strategy Policy 4	Yes - Waste facilities should be located as close as possible to places of generation to reduce transport impacts.	Noted
Mr. Clive Dorney	Principal Engineer Jaguar Land Rover	policy	Core Strategy Policy 5	Yes - Essential to treat waste as high as possible in the hierachy.	Noted
Mr. Clive Dorney	Principal Engineer Jaguar Land Rover	policy	Core Strategy Policy 6	Yes - A portfolio of processing methods and technologies will be required to reach targets. This diversity should therefore be encouraged.	Noted
Mr. Clive Dorney	Principal Engineer Jaguar Land Rover	policy	Core Strategy Policy 7	Yes - Aligns with JLR policies to reduce reliance on landfill into the future	Noted
Mr. Clive Dorney	Principal Engineer Jaguar Land Rover	policy	Core Strategy Policy 8	Yes - Protects local capacity for waste management	Noted
Mr. Clive Dorney	Principal Engineer Jaguar Land Rover	question	Question 3	No	
Mr. Clive Dorney	Principal Engineer Jaguar Land Rover	box	Development Management Policy 1	Yes - Links to Jaguar Land Rover's support of the local environment and habitats.	Noted
Mr. Clive Dorney	Principal Engineer Jaguar Land Rover	box	Development Management Policy 2	Yes	Noted
Mr. Clive Dorney	Principal Engineer Jaguar Land Rover	box	Development Management Policy 3	Yes	Noted
Mr. Clive Dorney	Principal Engineer Jaguar Land Rover	box	Development Management Policy 4	Yes	Noted
Mr. Clive Dorney	Principal Engineer Jaguar Land Rover	box	Development Management Policy 5	Yes	Noted
Mr. Clive Dorney	Principal Engineer Jaguar Land Rover	box	Development Management Policy 6	Yes	Noted
Mr. Clive Dorney	Principal Engineer Jaguar Land Rover	box	Development Management Policy 7	Yes	Noted
Mr. Clive Dorney	Principal Engineer Jaguar Land Rover	box	Development Management Policy 8	Yes - Necessary for long term sustainable development.	Noted

Mr. Clive Dorney	Principal Engineer Jaguar Land Rover	question	Question 4	No - Proposed policies provide a basis for sustainable waste management facility development.	
Mr. Clive Dorney	Principal Engineer Jaguar Land Rover	question	Question 5	No	
Ms Everitt		question	Question 1	Yes	Noted
Ms Everitt		question	Question 2	Yes	Noted
Ms Everitt		policy	Core Strategy Policy 2	Unsure - I am unsure about hazardous waste treatment and its effects.	Other than bonded asbestos which is managed locally by depositing into specially prepared cells at permitted landfills hazardous waste is treated at sites located in the region and not within Warwickshire.
Ms Everitt		policy	Core Strategy Policy 3	Yes - 8.9 & 8.10 make sense although as I have stated in Question 13 transporting by canal could have a detrimental effect on the leisure and recreation industry built up over the last few years and on unique habitats along canalways.	Noted
Ms Everitt		policy	Core Strategy Policy 4	Unsure - Would these small scale waste sites inappropriately develop into large scale?	Clearly there is the potential for this to happen but the development control and permitting processes will be able to address this.
Ms Everitt		policy	Core Strategy Policy 5	Yes - The earth resources are not infinite and we need to reuse and recycle for the benefit of future generations conserving resources wherever possible.	Noted
Ms Everitt		policy	Core Strategy Policy 6	Unsure - My fear is that any energy recovery systems would need material for maximum energy recovery and as a result demand for material could result in less recycling.	Noted but evidence from our European neighbours does show that energy from waste and recycling can exist in harmony.
Ms Everitt		policy	Core Strategy Policy 7	Yes - 8.16 - 8.19 measures mean that sensible decisions will be made regarding landfill developments.	Noted

Ms Everitt		policy	Core Strategy Policy 8	Yes - If a 'Waste Management Site' has been successful then accessibility and traffic to & fro will have already been considered. Hopefully the whole scenario will have been considered with regard to potential future development. NB. Roads up to a waste site e.g. JUDKINS, Nuneaton, should be monitored in a decent condition for visitors of some.	Noted
Ms Everitt		box	Development Management Policy 1	Yes - Ref 9.19 sites of sub regional or local importance are often vital for the health and well being of residents and often are home to building blocks of nature. ie insects - the numbers of which are decreasing, which has a knock on effect on the food chain.	Noted
Ms Everitt		box	Development Management Policy 2	Unsure - ref 9.41. There will be a increasing need for agricultural land in the future for the production of food. Lowest grade agricultural land can be improved.	<u>Consideration will be given to revising the agricultural land bullet point to reflect your concerns</u>
Ms Everitt		box	Development Management Policy 3	Yes - However ref 9.44. I am against transportation of waste by canal as it would have a negative effect on the growing recreational use of the canal system the environment of which is unique and should be preserved and protected. Alternative transportation by rail should be encouraged.	Noted
Ms Everitt		box	Development Management Policy 4	Yes - 9.51 - 9.53 are comprehensive points on paper. Strict conditions should be adhered to and work monitored regularly so that no dangerous shortcuts are made.	Noted

Ms Everitt		box	Development Management Policy 5	Yes - Some PROW's are so important in the everyday lives of the public, cutting journey times and often run through open spaces and countryside which is good for the health and well-being of adults and children alike getting them away from busy roads.	Noted
Ms Everitt		box	Development Management Policy 6	Unsure - Having witnessed the consequences of the building upstream in flood valleys and the proposed building on the edge of the some I am not confident in the relevant bodies e.g Environment Agency making the right decisions.	This policy does address your very concerns but unfortunately the actions of the Environment Agency are matters for them and not something that the core strategy can address.
Ms Everitt		box	Development Management Policy 7	Unsure - On reading 9.66 and 9.77 precautions appear comprehensive but I do not have the knowledge to be sure.	Noted
Ms Everitt		box	Development Management Policy 8	Vale View Open Space (Stockingford) and Hawthorne in Whittleford Park are good examples to me of what can be achieved after landfill. In this case those two areas were a clay and mortar hole created by clay extraction by Haunchwood Brick & Tile Co and are now part of a (SINC) Site of Importance for Nature Conservation.	Noted
Ms Everitt		question	Question 5	Yes - Waste bins in our area are increasinly being used for dog waste being put in with letter, which I expect goes to landfill which means items suitable for recycling in these are not. Litter bins and dog bins should not be combined. Litter of drinks containers e.g. bottles and cans are blighting the landscape. A push for a returnable deposit system on drinks containers could solve the problem.	Noted but unfortunately we can only try to influence public behaviour.

Ms Sarah Faulkner	National Farmers Union	section	1	Thank you for giving the National Farmers' Union (NFU) the opportunity to comment on the Warwickshire Waste Core Strategy. The NFU is the foremost trade association representing farmers and growers in England and Wales. Around 75% of all farm businesses are in membership nationally and the NFU has over 6400 members in the West Midlands. This response gives views on behalf of the farming and land management sector.	Noted
Ms Sarah Faulkner	National Farmers Union	section	5	We welcome strategy objectives particularly those that address the following issues: - Valuing, enhancing and protecting regional biodiversity - Using natural resources such as water and minerals efficiently - Encouraging and enabling waste minimisation, reuse, recycling and recovery to divert resources away from the waste stream	Noted

Ms Sarah Faulkner	National Farmers Union	section	8	<p>We are concerned that you primarily wish to locate waste management sites close to urban centres, this does not support those in rural areas who also have waste to recycle and dispose of. This includes domestic refuse from dwellings, agricultural waste from farm businesses and commercial waste. Households, farms and small businesses (i.e. from farm diversification) in rural areas all need the provision of local waste management facilities. Therefore we would like to see a commitment to more rural local facilities being made available. We would also like to draw attention to the fact domestic waste sites often refuse vans and commercial vehicles on site. However, as many farming families have such vehicles this can lead to problems when trying to access these services. It must be remembered that farmers do also produce domestic wastes and have a right to access facilities provided by Local Authorities to householders. We support landowner engagement and liaison to ensure suitable facilities are developed in the best locations, particularly in rural areas producing varying amounts of different wastes. We recognise it is important to reduce the distance that waste travels but locating waste facilities only in urban areas, without provision of adequate rural facilities, would mean increased journeys for those from rural areas. Small rural waste management facilities can be valuable when located within the green belt, particularly anaerobic digestion plants, composting sites and waste collection hubs (i.e. for collecting farm waste plastics). It is important to consider how to make it easier and more affordable for businesses (many of whom want to "do the right thing" with their waste) to access these facilities. With regards to farm plastics such as pesticide containers, fertiliser, seeds bags and silage wrap, we would like to see development of facilities to enable farmers to recycle these materials. The NFU in principle supports the concept of producer responsibility and the development of a recovery scheme for all agricultural waste plastics. We encourage Local Authorities to take a pro-active role in providing advice and assistance for agricultural businesses looking to recycle or dispose of farm plastics. Farmers' waste is also seasonal, for example netwrap and silage wrap will be generated over winter as silage is used to feed stock, thus there is a large quantity of plastic to dispose of during spring. We are pleased to see your references to encouraging anaerobic digestion, which promises to be an exciting area of growth over the coming years, both in terms of waste management and renewable energy production. However, we believe that most on-farm AD facilities will be developed for energy production purposes rather than as waste management treatment plants, making use of agricultural residues, manures/slurries and energy crops. We want to encourage farmers to adopt anaerobic digestion technologies in order to realise the multiple environmental benefits this could bring. There are many advantages to on-farm AD: not only in terms of renewable energy generation and reduced methane emissions from</p>	<p>Noted and we understand your concerns but despite rural communities generating waste it is not at the same level as it is in urban areas and therefore economies of scale play an important role in the provision of facilities. It is accepted that composting and AD are better suited to the rural environment and this will be encouraged within the constraints imposed by both the core strategy and development management policies.</p>
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			<p>agriculture; but also the production of a less odorous, high quality fertiliser product, with enhanced crop nutrient availability and improved hygiene standards. We would therefore urge Local Authorities to consider such AD facilities as non-waste planning applications, unlike larger "merchant" AD plants which are clearly waste facilities. In addition to management of farm-generated materials, the agricultural sector plays a vital role in the recovery and recycling of organic wastes from non-agricultural sources. Examples include: on-farm composting of municipal greenwastes; landscaping of "waste" materials from industry to provide agricultural benefit and anaerobic digestion of agricultural, municipal or commercial wastes. These activities are subject to the requirements of Environmental Permits from the Environment Agency and should be seen as part of the local solution to waste management. Efficient utilisation of "waste" materials in agriculture makes good environmental and economic sense, especially in rural areas where alternative options for waste management are usually limited. The Warwickshire Waste Core Strategy should encourage such efficient use of materials. Farmers are encouraged to optimise the amount of artificial fertilisers they use and increase soil organic matter. Therefore we support the beneficial use of suitable 'waste' derived materials for agricultural benefit to provide plant nutrients or organic matter (i.e. composts and digestates). This has the benefit of reducing reliance on artificial fertilisers and in diverting wastes from other industries from landfill. The planning system ought to support use of suitable wastes for the benefit of agriculture. I hope that you find our contribution to the Joint Waste Core Strategy consultation useful.</p>	
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Mr John Fenlon	South Warwickshire Environmental Association	section	1	<p>Our Association has studied the County Councils Preferred Options and Policies Consultation for the Waste Core Strategy and in principle support the Vision Statement, the Key Objectives, the Draft Core Strategy Policies and the Draft Development Management Policies. Our Committee Liaises regularly with Salford Priors Parish Council who in general support the above policies. In their letter dated 24th October 2011 (copy enclosed) some additional issues were raised which are not only of particular concern to Salford Priors Parish, but also to South Warwickshire Environmental Association. Our own Committee fully endorses The Parish Councils comments, particularly the issues of possible new waste treatment facilities within our Parish, which predominantly is considered high value agricultural land and should be protected at all costs. We would ask that WCC seriously considers these concerns at this stage of the Policy development and keep us fully informed on the progress of the Core Strategy.</p>	Noted
Kelly Ford	Nuneaton & Bedworth Borough Council	section	1	<p>Thank you for inviting Nuneaton and Bedworth Borough Council to comment on the above consultation document. The following comments have been agreed by the Portfolio Holder for Regeneration and Public Protection.</p>	Noted

Kelly Ford	Nuneaton & Bedworth Borough Council	section	8	In principle, NBBC supports much of Warwickshire County Council's Waste Core Strategy's (WCS) policies and Preferred Option, previously option 5. However NBBC objects to Policy CS8, based on the statement: "The County Council will object to proposals for non-waste development within or adjacent to existing waste facilities and sites with a permitted waste management use". We feel that such a statement may impinge on the Council's Potential Development Areas for the Borough Plan, as the policy is negatively worded and may undermine the choice of potential sustainable locations for future development in the Borough Plan. It is therefore suggested that Warwickshire County Council: - amend policy CS8 to set out criteria where proposals for non-waste development would be acceptable within or adjoining existing waste facilities. - work with NBBC to ensure that development proposals do not prejudice the Borough Plan and vice versa. Furthermore, in relation to waste management facilities, NBBC would like to be kept fully informed at the earliest stages of any future waste development proposals. This will allow the Borough Council to set out any concerns it has with the proposal and put forward recommendations to address those concerns. Please contact me if you have any queries pertaining to this representation.	Noted. The position has already been recognised which has opened the dialogue between the 2 authorities on this very issue. CS8 will be further scrutinised to see how best this can be addressed as it clearly will be an issue for all of the DCs in the County.
Cllr A Gordon		question	Question 1	Unsure - Very verbose and over-elaborate for a basically simple exercise.	Noted
Cllr A Gordon		question	Question 2	Unsure - 1) "Landfill" should no longer be used to dispose of any waste. 2) Earlier landfilled sites should be excavated and re-cycled and only if necessary re-filled to natural low level with inert waste. 3) Non-recyclable waste (excluding inert waste) should be incinerated in new plants to produce heat and power - do in Coventry.	

Cllr A Gordon		policy	Core Strategy Policy 1	No -1) Waste Management should be operated on a regional basis. 2) Landfill is not an option to be factored in.	Clearly economies of scale are likely to result in larger regional facilities but from the sustainability perspective waste should be handled as close to its origin as is commercially and economically viable.
Cllr A Gordon		policy	Core Strategy Policy 2	No -Exclude landfill sites altogether. Exclude agricultural buildings as this would spread over agricultural land, which must be protected against any such developments.	Accepted that landfill is the least preferred option but the infrastructure already associated with the landfill can be readily adapted to allow for alternative waste management activities which allow for the treatment and management of waste in a manner that is higher in the waste hierarchy than landfill.
Cllr A Gordon		policy	Core Strategy Policy 3	No -If the policy of reducing waste at source is to be effective, there should be no need for new waste sites, anywhere.	Zero waste is welcomed but to enable us to get there treatment capacity will be required.
Cllr A Gordon		policy	Core Strategy Policy 4	No - As before - waste reduction efforts should negate need for any new sites.	Zero waste is welcomed but to enable us to get there treatment capacity will be required.
Cllr A Gordon		policy	Core Strategy Policy 5	Unsure - Composting benefits are limited - there is not an unsatisfied demand for compost - much of basic material could be used to improve agricultural land, especially less productive areas.	Noted but composting along with Anaerobic Digestion are recognised treatment options for organic waste and as part of that markets will need to be established.
Cllr A Gordon		policy	Core Strategy Policy 6	Yes - Incineration is the only sensible method to deal with non-recyclable waste AND derive real benefits from heat and power generation. (New flue scrubbers can eliminate emissions).	Noted
Cllr A Gordon		policy	Core Strategy Policy 7	No -The only criteria for landfill sites should be for agricultural land improvement, with a view to improved yield for food production. (see earlier note ref returning old landfill sites to agriculture).	Landfill would normally be used to improve previously despoiled land with a view to returning it to a beneficial use which would include agriculture.
Cllr A Gordon		policy	Core Strategy Policy 8	Yes - Seems sensible policy.	Noted

Cllr A Gordon		box	Development Management Policy 1	Yes - 1) NB: The "constraints map" (p.20) does not provide - for protection of rivers (notably the River Avon) and watercourses. Flood zones are only in danger a few times in any year - whereas rivers are in constant danger of pollution and, therefore require constraints on any waste proposals nearby. AGRICULTURE needs to appear as an item listed for protection - it is more important as a stand-alone designation than any of those listed.	Noted
Cllr A Gordon		box	Development Management Policy 2	No - "loss of best and most versatile agricultural land" should be placed at the top of this list - not the last (least important?) item.	Noted
Cllr A Gordon		box	Development Management Policy 3	Yes - But "alternative to road transport" is hardly a serious statement that merits its top position in the hierarchy - concentrate on the "do-able" things!	Noted
Cllr A Gordon		box	Development Management Policy 4	Yes	Noted
Cllr A Gordon		box	Development Management Policy 5	Yes - "mitigation" is a feeble concept and experience indicates it is meaningless.	Noted
Cllr A Gordon		box	Development Management Policy 6	Yes - See earlier note re "flooding" - normal river sources and regular water flow need protection from contamination, not merely at flood times.	Noted
Cllr A Gordon		box	Development Management Policy 7	Yes	Noted
Cllr A Gordon		box	Development Management Policy 8	Yes - Except where "temporary waste management" could apply to excavations and restoration to agriculture of old landfill (and overfill) sites - such restorations should be welcomed, on a temporary activity basis only.	Noted

Cllr A Gordon		question	Question 5	Yes - 1) The protection, improvement and extension of land for agricultural food production is so important now and in the future, that it needs a fully considered policy, rather than minor references. 2) Incineration plants are the only sensible long-term solution to waste disposal and their construction and location should be considered more vigorously.	
Mr R Grainger	Wolston Parish Council	question	Question 1	Yes - This seems a bit lengthy for a vision statement and, given the existing arrangements, it also seems a little aspirational. However, the content is supported.	Noted
Mr R Grainger	Wolston Parish Council	question	Question 2	Yes - Suggest that Objective 4 be extended to include education of waste producers within communities (the general public) of the importance of minimising and separating their own waste, to help ensure that the bottom of the waste pyramid is fully aligned with all other parts of the waste management process.	Noted
Mr R Grainger	Wolston Parish Council	policy	Core Strategy Policy 1	Yes - Sensible, and consistent with the vision statement.	Noted
Mr R Grainger	Wolston Parish Council	policy	Core Strategy Policy 2	Yes - The policy has been thoroughly thought through.	Noted
Mr R Grainger	Wolston Parish Council	policy	Core Strategy Policy 3	Yes - The large scale sites have to go somewhere, and on 'brownfield' sites adjacent to the large conurbations is preferable.	Noted
Mr R Grainger	Wolston Parish Council	policy	Core Strategy Policy 4	Yes - The small scale sites have to go somewhere, and on 'brownfield' sites adjacent to primary or secondary settlements is preferable.	Noted

Mr R Grainger	Wolston Parish Council	policy	Core Strategy Policy 5	Yes - Reduce, Reuse and Recycle is the mantra of good waste management. This principle is adequately captured here.	Noted
Mr R Grainger	Wolston Parish Council	policy	Core Strategy Policy 6	Yes - The proposals are all consistent with the objective to maximise diversion from landfill and maximise creation of secondary products, whether that be compost or energy.	Noted
Mr R Grainger	Wolston Parish Council	policy	Core Strategy Policy 7	Yes - This is a good strong policy which will help to drive the other waste management options.	Noted
Mr R Grainger	Wolston Parish Council	policy	Core Strategy Policy 8	Yes - The principle is supported, but it is not clear how WCC will implement the safeguards suggested.	Noted
Mr R Grainger	Wolston Parish Council	box	Development Management Policy 1	Yes - This is comprehensive, and appears to cover all relevant aspects.	Noted
Mr R Grainger	Wolston Parish Council	box	Development Management Policy 2	Yes - This is comprehensive, and appears to cover all relevant aspects.	Noted
Mr R Grainger	Wolston Parish Council	box	Development Management Policy 3	Yes - Whilst agreeing with the policy in principle, I believe that the use of the word 'feasible' in paragraph one is incorrect and should be replaced by 'reasonably practicable'.	Noted and will change the wording to <u>"reasonably practicable"</u>
Mr R Grainger	Wolston Parish Council	box	Development Management Policy 4	Yes - No further comment.	Noted
Mr R Grainger	Wolston Parish Council	box	Development Management Policy 5	Yes - No further comment.	Noted
Mr R Grainger	Wolston Parish Council	box	Development Management Policy 6	Yes - Good strong policy, meets national requirements.	Noted
Mr R Grainger	Wolston Parish Council	box	Development Management Policy 7	Yes - Meets statutory requirements.	Noted

Mr R Grainger	Wolston Parish Council	box	Development Management Policy 8	Yes - The principle is supported, but would suggest that for a temporary waste management development a full restoration scheme will need to be approved, as well as submitted.	Noted. However any approval would include the requirement to restore in accordance with the submitted scheme
Mr R Grainger	Wolston Parish Council	question	Question 5	Yes - There seems to be little here about education of the waste generators to understand their responsibility to assist WCC and the LAs within Warwickshire to meet the aspirations set out in the Vision Statement. I would therefore propose a Policy that addresses this aspect.	
Mr Alan Granger	Chief Executive Ragley Hall	question	Question 1	Yes	Noted
Mr Alan Granger	Chief Executive Ragley Hall	question	Question 2	Yes	Noted
Mr Alan Granger	Chief Executive Ragley Hall	policy	Core Strategy Policy 7	Yes - This policy should assist and enable Ragley Estate to aim to achieve adequate satisfactory restoration of worked out mineral excavation areas to the benefit of the County at large, the local environment and in keeping with the principles of sustainable waste management, sustainable economic land management and sustainable environmental policies.	Noted
Mr Alan Granger	Chief Executive Ragley Hall	question	Question 3	Yes	Noted
Mr Alan Granger	Chief Executive Ragley Hall	question	Question 4	Yes	Noted

Amanda Grundy	Lead Advisor	section	1	<p>Thank you for consulting Natural England on the above. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. General Overall we are satisfied that the strategy and supporting consultation documents appear thorough, evidence based (where available), and to be in accordance with relevant international, national and regional planning plans and policies. The preferred option is based on "settlement hierarchy" and broadly seeks to steer new development to areas of higher population and existing waste management capacity rather than allocating strategic waste sites. Natural England recognises the advantages of this option, not least in terms of proximity to waste arising; however this will mean that detailed sustainability assessment for individual proposals will be particularly important to ensure potential impacts on the natural environment, landscape and public access are fully understood and can be avoided or mitigated.</p> <p>Ecological evidence</p> <p>We are pleased to note the reference in the preferred strategy to the County Biodiversity Strategy, District Biodiversity Action Plans and to data collected in the Habitat Biodiversity Audit. Natural England would expect this to inform all future waste development proposals. Monitoring We are satisfied that the Warwickshire Minerals and Waste Development Framework - Annual Monitoring Report (AMR) would provide a robust mechanism for effective monitoring of the Waste Core Strategy, which is recognised as being a key role for the WMWD. Natural England would be pleased to advise on existing and/or new targets and indicators in due course, particularly with respect to the natural environment.</p> <p>Sustainability Appraisal</p> <p>The 2007 Sustainability Appraisal provides a clear explanation of the issues and objectives and appears to present a robust assessment of each of each option against sound objectives. The more recent Emerging options SA presents a tabular assessment of the preferred options.</p> <p>Habitats Regulations Assessment</p> <p>The HRA covers both minerals and waste. It appears to be based on sound evidence and to accord with government and other guidance. Possible effects on European Sites within 15km of the County boundary</p>	Noted and welcome the offer of assistance to advise on the 2 remaining uncertainties in the HRA.
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				<p>have been assessed. Most sites have been screened out, but we note that effects on air quality still need to be investigated for Ensonâ€™s Pool SAC, and that effects on air and water quality still need to be investigated for the River Mease SAC. Natural England would be pleased to advise further with respect to the remaining uncertainties for both Ensonâ€™s Pool and the River Mease SACs. I hope this letter is helpful but please contact me if you would like to discuss any of the points raised.</p>	
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Amanda Grundy	Lead Advisor	section	3	<p>Constraints Map and Griff Hill Quarry SSSI The constraints map is currently confusing, the key appears to be incomplete and an inert landfill symbol partially obscures Griff Hill Quarry SSSI due to their close proximity. The core waste strategy aims to make best use of existing waste management capacity; however we would be concerned about any future expansion of the landfill site or other waste related activity adjacent to Griff Hill Quarry that affected the favourable conservation status of this geological SSSI. To address this we recommend that the Constraints Map is amended to show only those features listed in the key, and that a reference is made to the proximity of the SSSI to an existing landfill in the waste core strategy and the need to ensure future proposals do not impact on the qualifying interests of the geological SSSI is made clear.</p> <p>Environment chapter - correction Paragraph 3.20, and repeated elsewhere in the document, suggests there are approximately 90 SSSIs and 42 local nature reserves within Warwickshire. However our records suggest there are 61 SSSIs and 22 LNRs. We would be pleased to provide further information on these sites if that would helpful.</p>	<p><u>Agreed and can confirm that the deficiencies identified re the constraints map will be addressed.</u></p> <p>The map will be amended to include reference to the waste site symbology on figures 3.1 and 3.2. Unfortunately, it is not feasible/possible to include a key with all features on the one map.</p> <p>The Griff Hill Quarry SSSI is actually layered above the inert waste symbol and therefore is not obscured. The constraints map is for 'indicative' purposes only - it is intended that applicants undertake pre-application consultation with the Council so that designated sites that may be affected can be established at the outset. This will ensure that developments are designed to reduce any potential adverse impacts to an acceptable level, and ensure that the development is designed so as to enhance or improve such assets where possible.</p> <p>Comments in terms of number of SSSI and LNR designations are noted and will be changed.</p>
Amanda Grundy	Lead Advisor	question	Question 1	Yes	Noted

Amanda Grundy	Lead Advisor	question	Question 2	<p>Yes - We are broadly satisfied with the proposed key objectives, especially the emphasis on the waste hierarchy, ensuring facilities do not harm the environment, and seeking positive benefits where possible. We particularly welcome the objective to conserve & enhance natural, built, cultural and historic environment. However we suggest the relationship between waste reduction and the need to minimise the use of natural resources could be made clearer. We note that the reference to climate change has been removed since the Emerging options consultation. The rationale for this is unclear, as the waste strategy will have implications, positive and negative, for climate mitigation and adaptation.</p>	<p>Noted</p> <p>The reference to climate change has not been omitted – it has now been incorporated into Objective 8.</p>
Amanda Grundy	Lead Advisor	section	8	<p>We appreciate that the Core Strategy policies are overarching and focused on waste in terms of: - meeting capacity requirements; setting broad, spatial locations for large scale/small scale facilities; encouraging recycling, transfer, storage, composting and other types of recovery; minimising landfill and safeguarding existing waste sites. The core policies appear reasonable and we recognise that development management policies will provide more detailed guidance needed to assess individual planning applications.</p>	<p>Noted</p>

Amanda Grundy	Lead Advisor	box	Development Management Policy 1	<p>Policy DM1 We support this policy which seeks to protect and enhance the natural and built environment and welcome the inclusion of natural resources, biodiversity, geodiversity, archaeology, cultural assets, landscape quality and character, adjacent land uses, distinctive character and setting of settlements. We are satisfied the policy makes clear that waste proposals must be assessed to ensure international and national interests will be preserved or protected, and where possible enhanced. We are pleased to note that proposals must also seek to maintain and/or enhance recognised sites, features, and species of sub-regional or local import. The supporting text is also helpful, providing further detail of the County's ecological, cultural, landscape importance. We are pleased the valuable role of non-statutory sites is recognised and that planning permission will not be granted where it would result in the loss or deterioration of irreplaceable habitats, unless it can be demonstrated the loss would be outweighed by other benefits. The reference to wildlife networks is also welcome. We also recommend the text includes a reference to green infrastructure to help identify opportunities for waste development to contribute, and not undermine, the emerging green infrastructure plans and policies being developed by District Councils within Warwickshire. We are pleased to note the Warwickshire Historic Landscape Characterisation project will further contribute to understanding the landscape and its capacity for change and that new waste proposals will be informed by the HLC and other relevant County landscape assessments to enable an integrated approach to sustainable development.</p>	<p><u>We will ensure that the text is revised to include reference to Green Infrastructure.</u></p>
Amanda Grundy	Lead Advisor	box	Development Management Policy 2	<p>Policy DM2 We support this policy that will only permit proposals where they will not have significant adverse impacts on the local environment or communities. We consider the list of impacts is reasonably comprehensive and should help to protect the interests of both people and wildlife, for example minimising impacts from lighting/illumination is often also an important ecological consideration.</p>	Noted

Amanda Grundy	Lead Advisor	box	Development Management Policy 3	Policy DM3 We support this policy that seeks alternatives to road transport and to minimise distances and carbon emissions related to the movement of waste. We also support the requirement for a Transport Assessment for appropriate applications.	Noted
Amanda Grundy	Lead Advisor	box	Development Management Policy 4	Policy DM4 We support this policy, including the requirement for the design, construction and operation of waste facilities to demonstrate a contribution to climate change mitigation and adaptation.	Noted
Amanda Grundy	Lead Advisor	box	Development Management Policy 5	Policy DM5 We support this policy and the protection it affords to recreational assets and public rights of way.	Noted
Amanda Grundy	Lead Advisor	box	Development Management Policy 6	Policy DM6 We support this policy that seeks to avoid adverse impacts on water quality or increased flood risk.	Noted
Amanda Grundy	Lead Advisor	box	Development Management Policy 7	No comment	Noted
Amanda Grundy	Lead Advisor	box	Development Management Policy 8	Policy DM8 We support this policy and the emphasis it places on the need for the provision of high quality restoration.	Noted
Ms Rachel Hamblin	QSP Ltd	question	Question 1	Yes - written in an interesting tense: "will have"	Noted
Ms Rachel Hamblin	QSP Ltd	question	Question 2	Yes	Noted
Ms Rachel Hamblin	QSP Ltd	policy	Core Strategy Policy 1	Yes - I agree with it because I think that self sufficiency in an area is key and is closely linked with helping people to see the impact of the amount of waste they produce rather than just moving waste out of the county and out of 'sight'.	Noted

Ms Rachel Hamblin	QSP Ltd	policy	Core Strategy Policy 2	Unsure - I think it is important not to 'squeeze out' smaller waste operators by making it incredibly difficult to locate a business without the finances of the Biffas and Veolias of the industry. Smaller operators are key to self sufficiency within the county.	Your concerns are recognised but WCC is unable to show a preference to either small, medium or large enterprises.
Ms Rachel Hamblin	QSP Ltd	policy	Core Strategy Policy 3	Yes - In essence I agree with this but on the other hand the closer that waste treatment centres are to major and minor urban conurbations the more opposition you get to a planning proposal.	Agreed but something that has to be addressed as part of the planning process,
Ms Rachel Hamblin	QSP Ltd	policy	Core Strategy Policy 4	Yes - Small scale operators are key for hitting recycling/reuse targets especially in more remote locations.	Noted
Ms Rachel Hamblin	QSP Ltd	policy	Core Strategy Policy 5	Yes	Noted
Ms Rachel Hamblin	QSP Ltd	policy	Core Strategy Policy 5	Yes	Noted
Ms Rachel Hamblin	QSP Ltd	policy	Core Strategy Policy 6	Yes - However projects of this nature require the support and guidance of the planning team, more so than other waste proposals, as many emerging technologies are still fairly pioneering and someone somewhere has to give them an opportunity to succeed rather than refusing because they are relatively un-tested on a commercial scale.	Noted
Ms Rachel Hamblin	QSP Ltd	policy	Core Strategy Policy 7	Yes - There is likely to be waste that we cannot treat, recycle, reuse or anything else for many years to come and so it is realistic to assume that landfill will have a continuing role in the UK's management of waste.	Noted and agreed

Ms Rachel Hamblin	QSP Ltd	policy	Core Strategy Policy 8	Yes - This is very important to ensure that this whole core strategy is deliverable.	Agreed
Ms Rachel Hamblin	QSP Ltd	box	Development Management Policy 1	Yes - An assessment of all impacts is integral.	Agreed
Ms Rachel Hamblin	QSP Ltd	box	Development Management Policy 2	Yes - This, as above, is important however it is also important that perceived impacts are not taken as factual impacts as can often happen with public perception of a waste management project.	Noted
Ms Rachel Hamblin	QSP Ltd	box	Development Management Policy 3	Yes - It is important that transport is considered - rail and canal should be top of the agenda.	Noted but unlikely that rail and canals are likely to provide a transport solution for Warwickshire's waste
Ms Rachel Hamblin	QSP Ltd	box	Development Management Policy 4	Yes - A good policy - still needs to be careful not to price out smaller operators by making planning unobtainable.	Noted
Ms Rachel Hamblin	QSP Ltd	box	Development Management Policy 5	Yes	Noted
Ms Rachel Hamblin	QSP Ltd	box	Development Management Policy 6	Yes	Noted
Ms Rachel Hamblin	QSP Ltd	box	Development Management Policy 7	Yes	Noted
Ms Rachel Hamblin	QSP Ltd	box	Development Management Policy 8	Yes - This is important as operators in the past have left sites in a mess after moving on.	Noted
Ms Rachel Hamblin	QSP Ltd	question	Question 5	No	
Lynda Hart		question	Question 1	Yes	
Lynda Hart		question	Question 2	Yes	
Lynda Hart		policy	Core Strategy Policy 1	Yes -Recycling policy for municipal waste Warwickshire area very slow in getting to target (area) compared with other areas of UK.	Noted but Warwickshire did recover and compost 49.2% of its waste in 2010/11
Lynda Hart		policy	Core Strategy Policy 2	Yes - It is better to use existing sites than make new ones.	Noted

Lynda Hart		policy	Core Strategy Policy 3	No - Surely if recycling is the county's main objective there should be no need for large scale waste sites. Larger sites more impact on area they are in or adjacent to.	Large scale waste sites may include technologies that can contribute to enhanced recycling.
Lynda Hart		policy	Core Strategy Policy 4	Unsure - Depends on area - held close to local amenities and residents.	Noted
Lynda Hart		policy	Core Strategy Policy 5	Unsure - Traffic generates site to site - location - enviro impact - where high scale activity already taking place or has taken place close to residential area not entirely in agreement with further activity.	Existing sites will invariably have much of the infrastructure in place that may be beneficial for alternative and additional uses.
Lynda Hart		policy	Core Strategy Policy 6	Yes - In principle - but I do not agree with mass-burn incineration. Energy recovery yes.	Noted
Lynda Hart		policy	Core Strategy Policy 7	Yes - Providing it is 'managed' properly - traffic impact on local area should be considered carefully.	Noted
Lynda Hart		policy	Core Strategy Policy 8	Yes - Residential and landfill sites do not go hand in hand.	Supported but not necessarily agreed
Lynda Hart		box	Development Management Policy 1	Yes - Proposals where there could be adverse impacts should be avoided - we are losing green areas to housing as it is. SSSI areas of conservation should be left alone.	Noted
Lynda Hart		box	Development Management Policy 2	Yes - It's a great pity this was not on the agenda in the past! 'Health', 'Noise', Visual Disturbance, 'Vibration', 'Odour', Dust, Emissions. All these & more should be at the top of list along with enviro impact on surrounding area (up to now it hasn't been). Traffic generated - contamination of surrounds, pollution, gases generated. Health of residents close to site top priority.	Noted

Lynda Hart		box	Development Management Policy 3	Yes - Transportation is another item that has come way down the list in the past years - when suggestions made about other modes of transport they have been seemingly ignored - traffic impact heavy vehicles need for other forms of transport - carbon emissions - health of those close to roads - infrastructure if some roads do not lend themselves to ever increasing heavy traffic.	Noted but alternative modes of transport to manage Warwickshire's waste are unlikely to be viable but any application for new or changes to existing facilities will need to justify this.
Lynda Hart		box	Development Management Policy 4	Yes - Only 10%? - more of percentage hoped for. I agree with use of enviro friendly materials and that pollution should be reduced (or better still non-existent) solar power for all new buildings should be a must!	Noted but generally accepted by Government as being reasonable.
Lynda Hart		box	Development Management Policy 5	Yes - Public rights of way should be protected. There have been problems of this nature on old sites to present day.	Noted
Lynda Hart		box	Development Management Policy 6	Yes - I do not agree with any buildings where land is likely to flood or where the possibility of putting in a facility could cause a problem to adjacent land. Common sense I would have thought?	Noted
Lynda Hart		box	Development Management Policy 7	Yes - Again I would hope common sense would prevail as aviation travel increases - commercial etc lights are a nuisance anywhere let along for pilots in charge of a dangerous machine.	Noted
Lynda Hart		box	Development Management Policy 8	Yes - Provided it is done sensitively and residents (close by) point of view taken into consideration as they have to live with 'any' decision made.	Noted
Lynda Hart		question	Question 5	Yes - Road infrastructure seems to be low priority. Facility close to residential area.	The need for traffic assessments will address this very issue
Mr Tim Harvey-Smith		question	Question 1	Yes	Noted
Mr Tim		question	Question 2	Yes	Noted

Harvey-Smith					
Mr Tim Harvey-Smith		policy	Core Strategy Policy 1	Yes	Noted
Mr Tim Harvey-Smith		policy	Core Strategy Policy 2	Yes	Noted
Mr Tim Harvey-Smith		policy	Core Strategy Policy 3	Yes	Noted
Mr Tim Harvey-Smith		policy	Core Strategy Policy 4	Yes	Noted
Mr Tim Harvey-Smith		policy	Core Strategy Policy 5	Yes	Noted
Mr Tim Harvey-Smith		policy	Core Strategy Policy 6	Yes	Noted
Mr Tim Harvey-Smith		policy	Core Strategy Policy 7	Yes	Noted
Mr Tim Harvey-Smith		policy	Core Strategy Policy 8	Yes	Noted
Mr Tim Harvey-Smith		box	Development Management Policy 1	Yes	Noted
Mr Tim Harvey-Smith		box	Development Management Policy 2	Yes	Noted
Mr Tim Harvey-Smith		box	Development Management Policy 3	Yes	Noted
Mr Tim Harvey-Smith		box	Development Management Policy 4	Yes	Noted
Mr Tim Harvey-Smith		box	Development Management Policy 5	Yes	Noted
Mr Tim Harvey-Smith		box	Development Management Policy 6	Yes	Noted

Mr Tim Harvey-Smith		box	Development Management Policy 7	Yes	Noted
Mr Tim Harvey-Smith		box	Development Management Policy 8	Yes	Noted
Mr Tim Harvey-Smith		question	Question 5	No	Noted
Mr Stephen Hill	Birmingham International Airport	section	1	I refer to your consultation letter, dated 22 September 2011, concerning the Warwickshire Waste Core Strategy: Preferred Option & Policies (where Option 5 has been chosen as the Preferred Option from the previous consultation on Emerging Spatial Options). Birmingham International Airport Limited (the Airport Company operating Birmingham Airport) was consulted previously by the Council on the Waste Core Strategy - Emerging Options and submitted an electronic consultation response, where the critical issue for an airport concerning waste management policy is Aerodrome Safeguarding (as set out in the "Town & Country Planning (Safeguarding Aerodromes, Technical Sites & Military Explosives Storage Areas) Direction 2002"). Aerodrome Safeguarding ensures the safety of aircraft when in the vicinity of an airport by controlling potentially hazardous development activity. 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 and the vulnerability of aircraft to bird strikes from large and flocking birds due to the potential bird attraction of waste disposal. With this in mind, the Airport Company refers the Council to its previous consultation response and the need for the same comments to be considered in the context of Option 5, the Preferred Option for the Warwickshire Waste Development Framework Core Strategy now subject to this consultation process. In addition, by way of a consultation response, the Airport Company includes a copy of its previous consultation response on the Waste Core Strategy - Emerging Core Options, as the same comments, in terms of Aerodrome Safeguarding, apply to the Preferred Option as any of the Emerging Policy Options previously consulted on.	Noted

Mr Stephen Hill	Birmingham International Airport	question	Question 1	Birmingham International Airport Limited ("the Airport Company") agrees with the vision in terms of minimising the amount of waste sent to landfill. However, the vision needs to go further in making reference to "communicating" with industry, land owners and local communities when looking to deliver additional waste management capacity, it should "consult" with these interested parties and stakeholders i.e."When looking to deliver additional waste management capacity, consultation with industry, landowners and local communities will be of importance".	Noted
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Mr Stephen Hill	Birmingham International Airport	question	Question 2	<p>Birmingham Airport is a Strategic National Asset, the region's principal airport and plays a vital role in supporting the regional economy. Birmingham Airport is important in terms of the air links it provides and the role it can play in international connectivity by way of supporting business, commerce and industry, stimulating inbound tourism, attracting inward investment, fostering international trade and enhancing cultural and educational links. The Airport Company's interest in the Waste Development Framework and waste management policy is primarily related to Aerodrome Safeguarding (refer to "The Town & Country Planning (Safeguarding Aerodromes, Technical Sites and Military Explosives Storage Areas) Direction 2002"). Aerodrome Safeguarding ensures the safety of aircraft, and their occupants, when in the vicinity of an airport by controlling potentially hazardous development and activity. 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. Aircraft are vulnerable to bird strikes, i.e. collisions with large and flocking birds. Bird strikes are a major hazard and are also costly in terms of damage and delays to aircraft. Airport operators are required, as set out in the "The Town & Country Planning (Safeguarding Aerodromes, Technical Sites and Military Explosives Storage Areas) Direction 2002", to take necessary steps to ensure that bird strike is reduced to the lowest practicable level. The safeguarding area for birds extends some 13km from an airport. Thus, many airport operators, like the Airport Company, are statutory consultees on planning applications. Safeguarding of airports should be considered as part of the Waste Development Framework, particularly as the safeguarding zone for airports will affect many of the spatial options available for the strategy. The Key Objectives in the Waste Development Framework should therefore incorporate an additional objective relating to Aerodrome Safeguarding. Suggested inclusion: "To have regard to the Aerodrome Safeguarding requirements of an airport within 13km of any proposals for new or extended waste management facilities". Alternatively, the existing objective "To have regard for the concerns and interests of local communities" could be amended as follows: "To have regard for the concerns and interests of local communities and businesses, including airports in terms of Aerodrome Safeguarding".</p>	Addressed by the inclusion of Development Management Policy 7
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Mr James Hollyman		section	1	We respond to the current consultation on the Waste Development Framework Core Strategy as follows. Our representations are submitted on behalf of our client EMR Limited, operators of the metal recycling facility at Kingsbury in North Warwickshire.	Noted
Mr James Hollyman		section	4	We support the statement in paragraph in 4.42 that the core strategy needs to contain policies to ensure that there is no shortfall in waste treatment capacity.	Noted
Mr James Hollyman		section	8	As stated in our representations to the emerging spatial options consultation in May 2011, it is our view that the core strategy should recognise that existing waste recycling facilities in the Green Belt may be highly suitable locations for waste management facilities. As in the case of EMR at Kingsbury, these sites often benefit from excellent road and rail connections with few neighbours and the consequent issues in terms of residential amenity. Core Strategy Policy 2 - The Spatial Waste Planning Strategy for Warwickshire should be amended to recognise this.	Noted
Mr James Hollyman		policy	Core Strategy Policy 3	Core Strategy Policy 3 - Strategy for locating large scale waste sites should not preclude the use of sites not falling within the policy's areas i) and ii), provided that they are well served by water or rail transport.	Your concerns are adequately addressed in iii) of Core Strategy Policy 3
Mr James Hollyman		policy	Core Strategy Policy 8	We also support Policy CS8 which seeks to ensure that the operation of waste management facilities is not prejudiced by adjacent non-waste developments.	Noted

T.A. Hopkins		question	Question 1	No - Some existing facilities already have an adverse effect on local areas because lorries ignore preferred routes and there seems to be no structured enforcement of routes.	Noted
T.A. Hopkins		question	Question 2	Yes - Although I agree with the objectives I feel that there should be limits on the number of different facilities in a given area.	Noted
T.A. Hopkins		policy	Core Strategy Policy 1	Yes - Landfill diversion targets should be of great importance.	Noted
T.A. Hopkins		policy	Core Strategy Policy 2	No - The Northern Area of the County has been seriously blighted by its industrial past and because of this the option to use such sites continues to propagate this and gives no balance to the future.	Noted but equally much of the commercial and industrial developments are in the North of the county which accords with the principles of proximity.
T.A. Hopkins		policy	Core Strategy Policy 3	No - 8-9 would mean that the Atherstone area could become a "centre" for waste because of existing permissions and sites already in operation e.g. Bentley, Work---site, De Mulder and the new Biomass facility!	Noted and yes your assertions are correct.
T.A. Hopkins		policy	Core Strategy Policy 4	No - 8.13 The Atherstone area already has sufficient sites both large and small and should have structured limits.	Noted
T.A. Hopkins		policy	Core Strategy Policy 5	Yes - Providing existing small facilities are not allowed to develop into larger sites which would cause problems for the local population.	Noted
T.A. Hopkins		policy	Core Strategy Policy 6	Unsure - The last statement requires greater clarification on the management of residues.	Noted
T.A. Hopkins		policy	Core Strategy Policy 7	Yes - There should be no excuse for the new Company management of quarry sites at Mancetter to apply for landfill consent.	Noted

T.A. Hopkins		policy	Core Strategy Policy 8	Yes - Providing it has no knock on effect to existing agricultural/forestry activity.	Noted
T.A. Hopkins		box	Development Management Policy 1	Yes - 9.4: is extremely important. 9.5: enforceable - there have been instances in the past where planning applications have been "amended" by ignoring contraventions. Heritage and Cultural assets are extremely important.	Noted
T.A. Hopkins		box	Development Management Policy 2	Yes - Odour and dust are already issues raised. Background noise travels greater distances than many realise. Traffic movement particularly if weekend operation continues has great impact on recreational use of the countryside.	Noted
T.A. Hopkins		box	Development Management Policy 3	Yes - Traffic movements cause the greatest concern to people in the immediate area of facilities - e.g. out of hours movements, waiting for entry to facility etc.	Noted
T.A. Hopkins		box	Development Management Policy 4	Yes -9.53: Landscaping of sites is important but even with it some facilities in the Northern Area can be seen and heard for some considerable distance.	Noted
T.A. Hopkins		box	Development Management Policy 5	Yes - Even with such structure PROW have been subject to diversion or temporary suspension of use.	Noted
T.A. Hopkins		box	Development Management Policy 6	Yes - Some sites under consideration already have potential problems with water quality because of previous mining and quarrying activity.	Noted
T.A. Hopkins		box	Development Management Policy 7	Yes - I would consider that some existing sites in the county (including Coventry) are within the 13km limit.	Noted

T.A. Hopkins		box	Development Management Policy 8	Yes - There should be no temporary grants of consent they tend to have the habit of having extended consent or even application to permanency - permission by the "back door".	Noted
T.A. Hopkins		question	Question 5	No - My only comments, that such an important policy document should be adhered to without any easments.	Noted
Joanna Illingworth	Kenilworth Society	question	Question 1	Yes	Noted
Joanna Illingworth	Kenilworth Society	question	Question 2	Yes	Noted
Joanna Illingworth	Kenilworth Society	policy	Core Strategy Policy 1	Yes	Noted
Joanna Illingworth	Kenilworth Society	policy	Core Strategy Policy 2	Yes	Noted
Joanna Illingworth	Kenilworth Society	policy	Core Strategy Policy 3	Yes	Noted
Joanna Illingworth	Kenilworth Society	policy	Core Strategy Policy 4	Yes	Noted
Joanna Illingworth	Kenilworth Society	policy	Core Strategy Policy 5	Yes	Noted
Joanna Illingworth	Kenilworth Society	policy	Core Strategy Policy 6	Yes	Noted
Joanna Illingworth	Kenilworth Society	policy	Core Strategy Policy 7	Yes	Noted
Joanna Illingworth	Kenilworth Society	policy	Core Strategy Policy 8	Yes	Noted
Joanna Illingworth	Kenilworth Society	box	Development Management Policy 1	Yes	Noted
Joanna Illingworth	Kenilworth Society	box	Development Management Policy 2	Yes	Noted

Joanna Illingworth	Kenilworth Society	box	Development Management Policy 3	Yes	Noted
Joanna Illingworth	Kenilworth Society	box	Development Management Policy 4	Yes	Noted
Joanna Illingworth	Kenilworth Society	box	Development Management Policy 5	Yes	Noted
Joanna Illingworth	Kenilworth Society	box	Development Management Policy 6	Yes	Noted
Joanna Illingworth	Kenilworth Society	box	Development Management Policy 7	Yes	Noted
Joanna Illingworth	Kenilworth Society	box	Development Management Policy 8	Yes	Noted
Joanna Illingworth	Kenilworth Society	question	Question 5	The Kenilworth Society would like to see a commitment from Warwickshire County Council to keeping the existing opening hours for amenity tips. We believe that this is necessary to prevent further fly tipping. For similar reasons we do not wish to see increased restrictions on the use of these tips or the introduction of charges. This is perhaps more a management issue than a Core Policy matter. We welcome the retention of the Pipers Lane tip in Kenilworth.	Noted but a management matter for our Waste Management colleagues who are already aware of such implications.
Mr Keith Kondakor	Friends of the Earth (Nuneaton)	question	Question 1	No - Need to change to read "Recycling, composting and Anaerobic Digestion will have increased significantly".	<u>Noted but to ensure that the waste hierarchy is reflected in its entirety it is perhaps more appropriate to remove the word energy and just leave the word recovery which will equally reflect AD and energy infrastructure.</u>
Mr Keith Kondakor	Friends of the Earth (Nuneaton)	question	Question 2	No - Need to include AD. Need to add word flexible before "provision of waste management infrastructure".	Will insert the word flexible into objective 2.

Mr Keith Kondakor	Friends of the Earth (Nuneaton)	policy	Core Strategy Policy 1	No - CS1 needs to be based on actual arising. The tonnages and percentages in the RSS are ridiculous. It should be assumed the big fall in C&I waste estimated for 2009 would followed by falls in future as business becomes less wasteful. Rework as:- Sufficient and flexible waste management capacity will be provided to manage the equivalent of actual waste arisings in Warwickshire and as a minimum, achieve the County's targets for recycling, composting, reuse and landfill diversion. Your expected tonnages of C&I are implausible.	It is not necessary to include your suggested word "actual" into this policy as economics will clearly reflect that there is not overprovision.'
Mr Keith Kondakor	Friends of the Earth (Nuneaton)	policy	Core Strategy Policy 2	Unsure	Noted
Mr Keith Kondakor	Friends of the Earth (Nuneaton)	policy	Core Strategy Policy 3	No - Large scale facilities should only be located in the county where it can be shown that the need for the waste stream cannot be met by a smaller facility.	This will be addressed through the planning application process when the applicant will need to demonstrate need for the development.
Mr Keith Kondakor	Friends of the Earth (Nuneaton)	policy	Core Strategy Policy 4	Should include location at railheads.	It is not necessary to be specific about any particular location and as such Core Strategy 4 does not exclude the location at railheads
Mr Keith Kondakor	Friends of the Earth (Nuneaton)	policy	Core Strategy Policy 5	Yes	Noted
Mr Keith Kondakor	Friends of the Earth (Nuneaton)	policy	Core Strategy Policy 6	No - Need to add before other bullet points - where the facility is flexible or small enough not to undermine moving waste even higher up the waste hierarchy (this needs to tie in with WR2011 aim of getting more energy from the waste not more waste into energy recovery).	Noted and can add the additional bullet point as suggested <u>"where the facility is flexible or small enough not to undermine moving waste further up the waste hierarchy"</u>
Mr Keith Kondakor	Friends of the Earth (Nuneaton)	policy	Core Strategy Policy 7	Yes	Noted

Mr Keith Kondakor	Friends of the Earth (Nuneaton)	policy	Core Strategy Policy 8	Some waste management sites are vast and could in part be developed for mixed use. Need to be able to reduce size of sites.	Noted
Mr Keith Kondakor	Friends of the Earth (Nuneaton)	question	Question 3		
Mr Keith Kondakor	Friends of the Earth (Nuneaton)	box	Development Management Policy 1	Unsure	Noted
Mr Keith Kondakor	Friends of the Earth (Nuneaton)	box	Development Management Policy 2	Unsure - Need to explicitly reduce impact on Air Quality management zones.	Noted
Mr Keith Kondakor	Friends of the Earth (Nuneaton)	box	Development Management Policy 3	No - Need to explicitly reduce impact on Air Quality management zones. Also must not make route less safe for cycling and walking due to HGVs on narrow roads or ones without pavements. Should mitigate with improved provision for cycling and walking to reduce hazards.	Minimising the production of carbon emissions will in themselves help to address the air quality issues.
Mr Keith Kondakor	Friends of the Earth (Nuneaton)	box	Development Management Policy 4	No - Should maximise generation of renewable energy and where possible generate 100% of requirement.	Noted but would not be practicable to ask operators to generate that level of renewable energy from the development. Better to be specific about a minimum fixed percentage rather than introducing words like where possible.
Mr Keith Kondakor	Friends of the Earth (Nuneaton)	box	Development Management Policy 5	No - Should also look at creating positive recreational facilities such as rock climbing, BMX track etc.	Noted
Mr Keith Kondakor	Friends of the Earth (Nuneaton)	box	Development Management Policy 6	Yes	Noted
Mr Keith Kondakor	Friends of the Earth (Nuneaton)	box	Development Management Policy 7	Unsure	Noted

Mr Keith Kondakor	Friends of the Earth (Nuneaton)	question	Question 5	Yes - Need strong policy to include reuse in waste developments including such things as reuse shops at HWRC and extracting reusable C&D materials. Need a policy requiring all monitoring data and annual reports to be made available to the public on-line and main town halls in Warwickshire.	Noted
Professor R. D. Langman	SCAN - Stratford	question	Question 1	No - The vision does not explicitly state the objectives. For example, a waste developmet must include a conversion rate to providing energy- also see section 19. THIS IS A DIFFICULT PAPER TO DOWNLOAD YOU SHOULD MAKE IT EASIER TO 'CLICK' TO SPECIFIC ITEMS!	Noted
Professor R. D. Langman	SCAN - Stratford	question	Question 2	No - There should be a reference to how to minimise the results of waste collection and treatment. This latter should require a method of obtaining energy - note the Edmonton exercise.	Noted
Professor R. D. Langman	SCAN - Stratford	policy	Core Strategy Policy 1	Unsure - It is not absolutely clear what your annual target capacity of waste handling is to be. It is not enough to state "sufficient waste management capacity" in 8.1. You obviously anticipate a shortfall - what are the boundaries of this assumption?	Shortfall identified through technical studies undertaken by the Regional Technical Advisory Body. Existing capacity identified through the permit returns to the Environment Agency.
Professor R. D. Langman	SCAN - Stratford	policy	Core Strategy Policy 2	Unsure - I do not feel qualified to contribute to this section. Obviously we have run into problems in developing new sites and the extent to which these objections have been met is not clear.	Noted
Professor R. D. Langman	SCAN - Stratford	policy	Core Strategy Policy 3	Unsure - Again I do not feel qualified to make suggestions.	Noted
Professor R. D. Langman	SCAN - Stratford	policy	Core Strategy Policy 4	Unsure - This section lacks specific detail. Would you include, for example, Burton Farm in this category or is it merely a collection point?	Noted and yes this would include the Burton Farm type of facility.

Professor R. D. Langman	SCAN - Stratford	policy	Core Strategy Policy 5	Unsure - Again this section lacks detail - what are the circumstances leading to hierarchical development?	European and National legislation requires an hierarchical approach.
Professor R. D. Langman	SCAN - Stratford	policy	Core Strategy Policy 6	No - This is perhaps the weakest part of the document. My personal feeling is that waste is a prime source of energy and its derivational resource should be properly assessed and planned for in such a document as this.	Noted and yes waste is recognised throughout the document as a potential source of energy but this should not be to the detriment of recycling.
Professor R. D. Langman	SCAN - Stratford	policy	Core Strategy Policy 7	Yes	Noted
Professor R. D. Langman	SCAN - Stratford	policy	Core Strategy Policy 8	Yes - There should be strategic protection of these sites. Incidentally how will you provide with security? also note next section.	Noted
Professor R. D. Langman	SCAN - Stratford	box	Development Management Policy 1	In itself this section OK but there should be a paragraph on making proposals subject to open and public scrutiny. NOTE - there is no mention of FLOOD protection - you have to wait till much later - BUT it is an aspect of waste management.	Noted but the planning process is already transparent and open to public scrutiny.
Professor R. D. Langman	SCAN - Stratford	box	Development Management Policy 2	Difficult to comment on this section.	Noted
Professor R. D. Langman	SCAN - Stratford	box	Development Management Policy 3	Clearly there must be 2 main objectives. 1) To reduce mileage between waste source and treatment. 2) To maximise use of transport route via main roads. Clearly item 2 may need clarification. In other words are paragraphs 9.45 strong enough?	Noted and that is why the strategy is to encourage the provision of facilities as close to the waste arisings as practicable.
Professor R. D. Langman	SCAN - Stratford	box	Development Management Policy 4	You do not state your expectations for the future. For example, will the population increase - and where. Will waste production from various sources remain static or increase? What will industry contribute to waste in the future?	These matters are dealt with in the chapters dealing with the spatial portrait and the waste management context.

Professor R. D. Langman	SCAN - Stratford	box	Development Management Policy 5	Not qualified to comment. Note however there shall be a restraint on local authorities selling off playing fields as happened in Stratford - you will argue not a waste management matter?	Noted
Professor R. D. Langman	SCAN - Stratford	box	Development Management Policy 6	BUT see earlier. Reference to flood risk should be associated with other risks.	Noted
Professor R. D. Langman	SCAN - Stratford	box	Development Management Policy 7	Not qualified to comment.	Noted
Professor R. D. Langman	SCAN - Stratford	box	Development Management Policy 8	Not really qualified to comment.	Noted
Professor R. D. Langman	SCAN - Stratford	question	Question 5	I may seem to have been critical - for which apologies since I recognise the problems of drafting. However it is not a good report. You do not state what the statistical position is now and what will be the spatial and quantitative position both in the medium and long term. You do not as a result have to estimate the budgetary requirements of the policy. I would not like to implement this document!	
Mr Lavis		question	Question 1	Yes	Noted
Mr Lavis		question	Question 2	Yes	Noted
Mr Lavis		policy	Core Strategy Policy 1	Yes	Noted
Mr Lavis		policy	Core Strategy Policy 2	Yes	Noted
Mr Lavis		policy	Core Strategy Policy 3	Yes	Noted
Mr Lavis		policy	Core Strategy Policy 4	Yes	Noted
Mr Lavis		policy	Core Strategy	Yes	Noted

			Policy 5		
Mr Lavis		policy	Core Strategy Policy 6	Yes - but, I have concern that the flue gases, although clean may have unpleasant smells that may affect neighbouring communities.	Noted but be assured that the components associated with odour are removed during the gas cleaning process.
Mr Lavis		policy	Core Strategy Policy 7	Yes	Noted
Mr Lavis		policy	Core Strategy Policy 8	Yes	Noted
Mr Lavis		box	Development Management Policy 1	Yes	Noted
Mr Lavis		box	Development Management Policy 2	Yes	Noted
Mr Lavis		box	Development Management Policy 3	Yes	Noted
Mr Lavis		box	Development Management Policy 4	Yes	Noted
Mr Lavis		box	Development Management Policy 5	Yes - because footpaths & rights of way are a very valuable resource.	Noted
Mr Lavis		box	Development Management Policy 6	Yes	Noted
Mr Lavis		box	Development Management Policy 7	Yes	Noted
Mr Lavis		box	Development Management Policy 8	Yes	Noted
Mr Lavis		question	Question 5	No	Noted
Mrs Jenny Mason	Whitnash Town Council	question	Question 1	Yes	Noted

Mrs Jenny Mason	Whitnash Town Council	question	Question 2	Unsure about Objective 2 - we understand the need for some cross boundary waste transfer, but this should be kept to a minimum to avoid large wagons on motorway.	Noted but economies of scale will undoubtedly result in cross boundary movements.
Mrs Jenny Mason	Whitnash Town Council	policy	Core Strategy Policy 1	Unsure about using previously developed land especially agricultural/forestry land.	Noted but promoted by Planning Policy Statement 10
Mrs Jenny Mason	Whitnash Town Council	policy	Core Strategy Policy 2	Yes	Noted
Mrs Jenny Mason	Whitnash Town Council	policy	Core Strategy Policy 3	Yes	Noted
Mrs Jenny Mason	Whitnash Town Council	policy	Core Strategy Policy 4	Yes	Noted
Mrs Jenny Mason	Whitnash Town Council	policy	Core Strategy Policy 5	Yes	Noted
Mrs Jenny Mason	Whitnash Town Council	policy	Core Strategy Policy 6	Yes	Noted
Mrs Jenny Mason	Whitnash Town Council	policy	Core Strategy Policy 7	Yes	Noted
Mrs Jenny Mason	Whitnash Town Council	policy	Core Strategy Policy 8	Yes	Noted
Mrs Jenny Mason	Whitnash Town Council	box	Development Management Policy 1	Yes	Noted
Mrs Jenny Mason	Whitnash Town Council	box	Development Management Policy 2	Yes	Noted
Mrs Jenny Mason	Whitnash Town Council	box	Development Management Policy 3	Yes	Noted
Mrs Jenny Mason	Whitnash Town Council	box	Development Management Policy 4	Yes	Noted
Mrs Jenny Mason	Whitnash Town Council	box	Development Management	Yes	Noted

			Policy 5		
Mrs Jenny Mason	Whitnash Town Council	box	Development Management Policy 6	Yes	Noted
Mrs Jenny Mason	Whitnash Town Council	box	Development Management Policy 7	Yes	Noted
Mrs Jenny Mason	Whitnash Town Council	box	Development Management Policy 8	Yes	Noted
Mrs Jenny Mason	Whitnash Town Council	question	Question 5	No	Noted
Mr W P McCarthy		question	Question 1		
Mr W P McCarthy		question	Question 2		
Mr W P McCarthy		policy	Core Strategy Policy 1	Yes - It encompasses all matters that are important.	Noted
Mr W P McCarthy		policy	Core Strategy Policy 2	Yes - It follows the object of siting facilities near the larger settlements.	Noted
Mr W P McCarthy		policy	Core Strategy Policy 3	Yes -Follows the aim of siting facilities near primary and secondary settlements.	Noted
Mr W P McCarthy		policy	Core Strategy Policy 4	Yes - It agrees with priority i) but accepts that some sites such as ii) may be acceptable.	Noted
Mr W P McCarthy		policy	Core Strategy Policy 5	Yes - I strongly agree with both composting and incineration where the latter can be achieved by adding heat to power production.	Noted
Mr W P McCarthy		policy	Core Strategy Policy 6	Yes - Agreed, provided that due care is taken with composting not to spread undesirable infestations etc.	Noted
Mr W P McCarthy		policy	Core Strategy Policy 7	Yes - Agree that this aims to produce minimal disposable material.	Noted

Mr W P McCarthy		policy	Core Strategy Policy 8	Yes - I agree that it is wise to keep these protected by such control of development nearby, which might hinder proper operation or potentially cause the facility to close.	Noted
Mr W P McCarthy		box	Development Management Policy 1	Yes - Sites not specified in DM1 need protection if waste sites are proposed nearby. All are important.	Noted
Mr W P McCarthy		box	Development Management Policy 2	Yes - Any site which impacts on the health and amenities of the population in its vicinity will need to reduce such impact to a minimum.	Noted
Mr W P McCarthy		box	Development Management Policy 3	Yes - It is agreed that a minimum cost due to distance or type of transport is essential.	Noted
Mr W P McCarthy		box	Development Management Policy 4	Yes - By minimisation of carbon emissions and consequent energy usage.	Noted
Mr W P McCarthy		box	Development Management Policy 5	Yes - Most of these impacts would affect the local population and leisure facilities, which therefore must be minimised.	Noted
Mr W P McCarthy		box	Development Management Policy 6	Yes - Already, there is evidence of flooding above previous levels, and therefore in such locations all such planning proposals for these sites should be banned.	Noted
Mr W P McCarthy		box	Development Management Policy 7	Yes - These are usually structures such at Jaguar at Gaydon which should either be refused or provided with early warning devices.	Noted
Mr W P McCarthy		box	Development Management Policy 8	Yes - There would need to be very compelling reasons to grant permission for such proposals.	Noted
Mr W P McCarthy		question	Question 5	No	Noted
Ms Lesley Mobbs		question	Question 1	Yes	Noted
Ms Lesley Mobbs		question	Question 2	Yes	Noted

Ms Lesley Mobbs		policy	Core Strategy Policy 1	Unsure - Parish Councils need to be involved in planning applications which may affect their area.	Noted but the planning consultation process does allow Parish Council input to the decision making.
Ms Lesley Mobbs		policy	Core Strategy Policy 2	No - Facilities should be away from rural areas that may be affected.	Noted but some waste management treatment processes such as composting are better suited to rural areas
Ms Lesley Mobbs		policy	Core Strategy Policy 3	No	Noted
Ms Lesley Mobbs		policy	Core Strategy Policy 4	Unsure	Noted
Ms Lesley Mobbs		policy	Core Strategy Policy 5		
Ms Lesley Mobbs		policy	Core Strategy Policy 6	Unsure - It must not impact in any way on rural communities.	Noted
Ms Lesley Mobbs		policy	Core Strategy Policy 7		
Ms Lesley Mobbs		policy	Core Strategy Policy 8	Yes - All proposals for non waste development must be placed elsewhere.	Noted
Ms Lesley Mobbs		box	Development Management Policy 1	Yes	Noted
Ms Lesley Mobbs		box	Development Management Policy 2	Yes	Noted
Ms Lesley Mobbs		box	Development Management Policy 3	Unsure - Any transport should stick to main major highways and not come through rural villages, which would be detrimental to the inhabitants.	Noted
Ms Lesley Mobbs		box	Development Management Policy 4	Yes	Noted
Ms Lesley Mobbs		box	Development Management Policy 5	Yes	Noted
Ms Lesley Mobbs		box	Development Management Policy 6	Yes	Noted

Ms Lesley Mobbs		box	Development Management Policy 7	Yes	Noted
Ms Lesley Mobbs		box	Development Management Policy 8	Yes	Noted
Ms Lesley Mobbs		question	Question 5	No	Noted
Mr Jonathan Parkhouse	Warwickshire County Council	section	1	I have very little to say about this document, other than to warmly support the very positive way in which Historic Environment considerations are dealt with, starting with the Vision Statement, through Objective 6 and in Policies SC2 and in particular DM1 and the associated text in paras 9.22 - 9.29. The only change I would recommend is to para 3.23, where it would be more accurate to state that there are 18883 HLC records, rather than HLC Areas. We should like to be able to engage with the waste strategy once specific site allocations are being selected.	Noted and the text will be changed as you suggest to <u>there are 18883 HLC records</u> rather than HLC Areas Noted and to be amended accordingly.
Ms Laura Perry	Environment Agency	section	1	Thank you for consulting the Environment Agency on the above document that was received on 26 September 2011. We welcome the opportunity to comment. This consultation follows the meeting held at our offices on 2 September to discuss our previous response to the Core Strategy (CS).	
Ms Laura Perry	Environment Agency	section	2	We support the European level of legislation being incorporated in to the policy content. This now sets the scene from European down to local level enabling better understanding of where the policy comes from. We welcome the changes to the Waste Hierarchy under Planning Policy Statements which reflects the revised Waste Framework Directive.	

Ms Laura Perry	Environment Agency	section	3	<p>We welcome the additions to the Transport section on pages 14 and 15. This highlights the opportunities for more sustainable ways to move waste by non-road transport including rail-freight and canal movements. Figures 3.1 and 3.2 demonstrate the transport infrastructure beyond the boundary of the County Council. We considered this would be beneficial also in Figure 3.3, Indicative Constraints Map, which currently does not show cross boundary constraints. This would be beneficial for facilities located close to the border of neighbouring local authorities. We support the addition of paragraph 3.26 which acknowledges the additional work that maybe required regarding updating the Strategic Flood Risk Assessment. We note water quality has been incorporated in the objectives and policies, however there is still no mention of the Water Framework Directive (WFD) within the CS. We would therefore reiterate our previous WFD comments as follows:"We consider it would be advantageous to also include the spatial portrait of water quality as this will highlight where improvements are needed to meet the Water Framework Directive (WFD) targets. As a co-deliverer of WFD, your Authority should ensure that your policies and strategies actively support its aspirations and targets. The WFD does not allow for any drop in quality of the water environment, and aims for all waterbodies achieved Good Status by 2015. River Basin Management Plans (RBMP) have been drawn up, which assess the current state of the water environment, by dividing up the water environment into river basins and water bodies. The RBMPs then specify what is required to be undertaken to ensure that Good Status is achieved on schedule. Warwickshire largely falls within the Severn RBMP. In the absence of RSS policies supporting the implementation of these plans, all Planning Authorities should now include a commitment towards meeting these targets within their strategic plans. To achieve this, while mitigating climate change and the additional development proposed between now and 2015, policy and decision makers need to take a tough stance on the control of water pollution, ensuring betterment from the existing situation is achieved wherever possible, and the risk of contamination of Controlled Waters is minimised in all new developments and redevelopment proposals. More information and access to the Severn RBMPs can be found at this link: http://www.environment-agency.gov.uk/research/planning/33106.aspx We therefore strongly recommend that the CS further considers including the WDF. The CS should refer to having due regard to the WFD and ensure no deterioration from activities controlled or which fall under this options and policy document. As discussed at our meeting on 2 September we now agree that it is unlikely there will be a need for a Water Cycle Study specifically for this waste strategy, however when a site is planned or extended, the County Council will have to ensure there will be no deterioration to the relevant waterbody caused by the process/actions or discharges from that site (hence the requirement for a</p>	
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				<p>paragraph relating specifically to WFD and no deterioration in the policy document itself). Again, as discussed at the meeting, the sub-regional WCS does not take into account or discuss waste sites, only housing and development (generally from a foul effluent and water supply perspective). We therefore recommend removing the last sentence from paragraph 3.28.</p>	
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Ms Laura Perry	Environment Agency	section	4	<p>Background to waste management in Warwickshire The background to waste management in Warwickshire is good, and provides a clear picture of the strategic interactions with neighbouring waste management authorities and waste flow to key sites into and out of Warwickshire. It would be useful to have these strategic sites shown on the Warwickshire Waste Context map (Figure 3.1), including the sites outside of Warwickshire which are strategic sites in terms of managing waste from Warwickshire. Section 4.5 identifies synergies in Warwickshire where waste from MRF facilities provides fuel to a cement kiln, it would also be helpful to highlight this synergy on the Figure 3.1. Local Authority Collected Municipal Waste (LACMW) We welcome the changes to the definition of LACMW. Figures 4.1 and 4.2 are badly pixelated and are hard to read, both when printed and electronically. Construction and Demolition Waste As suggested in our previous response, we recommend the references to licensing are removed. 4.35 states "only the larger sites are licensed for the requirement of Site Waste Management Plans (SWMP's)" Please remove this sentence as it is incorrect. Although SWMP's are a legal requirement for construction projects costing over Â£300,000, they are not licensed. 4.36 states "for sites under Â£300,000 in value there are no such requirements which means that there aren't isn't accurate data about C&D waste arisings and disposals". Please note that for projects under Â£300,000 in value there is no legal requirement for SWMP although producing such a plan would be considered best practise. 4.37 states ".. In such circumstances e.g in Quarry restoration schemes for instance, the material never becomes waste under the definition". Please remove this sentence, determining the legal definition of waste is complex, and is ultimately a matter for the courts to decide. To avoid any ambiguity and to prevent any impression of tacit approval please omit this sentence.</p>	
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Ms Laura Perry	Environment Agency	section	5	<p>Vision Statement We now consider the Vision is much more positive. It highlights cross boundary working, engagement with all parties and a strong consideration of the natural environment. We welcome and support the Vision. Key Objectives We welcome and support the changes made to the Objectives with particular reference to 2, 3, 4 and 8 which represent the comments in our previous response. Waste Management Treatment and Disposal Options 6.8 makes the following comment: "Any future waste strategy could not discount the use of incineration and thermal treatment as this would be outside government and EU law". Given that the policy context is given in Chapter 2 we do not consider it necessary to include this statement here, it should be deleted.</p>	
Ms Laura Perry	Environment Agency	section	7	<p>Option 5 sets out broad locations, however it is clear from the constraints map that not all sites within these locations will be acceptable. The Development Management Policies set out in Section 9 will help direct developers towards the most suitable sites within these broad locations. Amenity issues can arise if a waste management facility is located in proximity to sensitive land uses. Acceptability of the development will vary depending on the nature of the facility, whether waste management activities are carried out within a building or in the open air and the extent to which fugitive emissions will be controlled or abated.</p>	

Ms Laura Perry	Environment Agency	section	8	Overall we support the draft policies. We consider a clearer link between policies and objectives would benefit this document, i.e. highlight how the policies will achieve the objectives.	
Ms Laura Perry	Environment Agency	policy	Core Strategy Policy 1	Yes - Agree.	
Ms Laura Perry	Environment Agency	policy	Core Strategy Policy 5	We agree with these policies. However, proposals captured under these policies must also accord with the waste hierarchy.	
Ms Laura Perry	Environment Agency	policy	Core Strategy Policy 6	We agree with these policies. However, proposals captured under these policies must also accord with the waste hierarchy.	

Ms Laura Perry	Environment Agency	policy	Core Strategy Policy 7	<p>We believe it is important for the protection of Controlled Waters that our Landfill Location position statement is incorporated into Figure 7.1 and Policy CS7. The Warwickshire and Coventry region incorporates important Principal Secondary aquifers that are important for both Public and Private water supply and provide important baseflow contribution to rivers and streams locally. Therefore, it is important that groundwater quality is protected from inappropriate landfill development. Incorporation of our position statement in to the CS is likely to be the most effective way of achieving this. Our Position Statement; Background The disposal of waste into landfill is a major potential hazard to groundwater quality. Landfills represent a store of pollutants some of which will inevitably find their way into the environment. To reduce the risk to groundwater our Position Statement aims to direct landfill to areas where the risk of groundwater pollution is minimised and to avoid the situation where the development of a groundwater resource is constrained by the presence of a landfill. This will ensure the groundwater resource is available for future generations. The objectives of the Position Statement on landfill location are: - to ensure that in vulnerable areas, groundwater protection measures will be viable for the entire duration of the pollution risk from a landfill; - to provide a framework for risk based advice to waste planning authorities (WPAs) and developers. The aim is to steer development into less sensitive locations and to facilitate WPA compliance with their statutory role under the Landfill Directive. Landfill location position statement (i) There is a presumption against any proposed landfill site in groundwater Source Protection Zone 1. (ii) For all other proposed landfill site locations, a risk assessment must be conducted based on the nature and quantity of the wastes and the natural setting and properties of the location. (iii) Where this risk assessment demonstrates that active long-term site management is essential to prevent long-term groundwater pollution, the Environment Agency will object to sites: - below the water table in any strata where the groundwater provides an important contribution to river flow or other sensitive surface waters; on or in a Principal Aquifer; within Source Protection Zones 2 or 3. We therefore recommend as an additional point is added to Policy CS7 as follows: vi) it complies with the Environment Agency position statement of Landfill Location.</p>	
Ms Laura Perry	Environment Agency	policy	Core Strategy Policy 8	<p>We welcome this policy to safeguard existing waste sites. Although opportunities to address any existing conflicting land use, between waste and non waste developments could also be addressed.</p>	

Ms Laura Perry	Environment Agency	section	9	<p>We welcome and support Policy DM6 - Flood Risk and Water Quality. To strengthen this policy and the supporting text we recommend the following: Policy DM6 - Flood Risk and Water Quality Planning permission will not be granted where waste management proposals would have a detrimental effect on water quality and achieving the targets of the Water Framework Directive or would be at risk of flooding or because of its impact, would be likely to cause flooding elsewhere.</p> <p>9.63....The use of SuDS such as ponds, reedbeds and other landscape features that help to reduce flood risk, improve water quality and increase biodiversity will be supported. The County Council is a co-deliver of the WFD and therefore also has a responsibility over water quality. We therefore recommend the additional following text within paragraph 9.64: 9.64 The County Council is a co-deliver of the Water Framework Directive. The Water Framework Directive sets a target of aiming to achieve at least Good Status' in all water bodies by 2015. Waste Management activities can potentially.....</p>	
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Ms Laura Perry	Environment Agency	question	Question 5	Tracking Progress Targets and milestones should be set out to track progress. With the current economic uncertainties it is also important that requirements for and delivery of additional waste management capacity is regularly re-evaluated to ensure timely delivery of sufficient waste capacity to meet Warwickshire's needs. We thank you again for the opportunity to be involved in the Waste Core Strategy. We trust the information provided is self-explanatory, however if you have any queries, please do not hesitate to contact us.	
Mr M J Phillpot	Salford Priors Parish Council	section	2	The aims of the Warwickshire Waste Management Strategy (Pages 5 and 6) to increase recycling is not helped when schools are charged for the collection of their recycled materials as is apparently happening in our area. It is well known that children are important ambassadors for the recycling message now and in the future.	Noted
Mr M J Phillpot	Salford Priors Parish Council	policy	Core Strategy Policy 2	New facilities for waste treatment should be sited on industrial estates, brownfield sites or within existing waste management facilities. Salford Priors is an area with high value agricultural land and this should be protected from development. (Page 45).	Noted
Mr M J Phillpot	Salford Priors Parish Council	section	9	Salford Priors has suffered from short-comings in enforcement of waste management operations at another location whereby inert fill to restore a derelict mineral working in our parish was dumped illegally elsewhere. The Parish Council is very concerned about the lack of enforcement officers at the County Council. (Page 54).	Noted

Ms Barbara Plummer	Pillerton Priors Parish Council	section	1	We would wish to see a clear strategy set out in the Waste Core Strategy document in relation to the location and development of Animal Carcass Transfer Stations and the regulations governing them. There is currently no clear strategy involving the collection/storage/disposal of animal carcasses. This would necessitate all parties involved in such an operation to be consulting together - WCC, SDC, DEFRA, TRADING STANDARDS, PARISH COUNCILS, RESIDENTS who may be affected. The strategy should also encompass Abattoirs, Incinerators, Knackers Yards and Slaughterhouses.	It is not the intention of the waste core strategy to differentiate between the different uses of waste transfer stations as these will be dealt with through planning conditions.
Mrs V J Pratt	Wootton Wawen Parish Council	question	Question 1	Yes	Noted
Mrs V J Pratt	Wootton Wawen Parish Council	question	Question 2	Yes	Noted
Mrs V J Pratt	Wootton Wawen Parish Council	policy	Core Strategy Policy 1	Yes - Looks a sound basis on which to move forward.	Noted
Mrs V J Pratt	Wootton Wawen Parish Council	policy	Core Strategy Policy 2	Yes - The strategy seems to be appropriate for delivery of a waste planning strategy.	Noted
Mrs V J Pratt	Wootton Wawen Parish Council	policy	Core Strategy Policy 3	Yes - Common sense and appropriate in business terms for WCC. ie the benefits of scale.	Noted
Mrs V J Pratt	Wootton Wawen Parish Council	policy	Core Strategy Policy 4	Yes - The caveat under point ii is very important and essential in this situation.	Noted
Mrs V J Pratt	Wootton Wawen Parish Council	policy	Core Strategy Policy 5	Yes - Looks to be a practical solution.	Noted
Mrs V J Pratt	Wootton Wawen Parish Council	policy	Core Strategy Policy 6	Yes - Any development will need to accord to all other policies - good safeguard.	Noted
Mrs V J Pratt	Wootton Wawen Parish Council	policy	Core Strategy Policy 7	Yes - Underlines the need/policy to deal with waste as high up the waste hierarchy as possible.	Noted

Mrs V J Pratt	Wootton Wawen Parish Council	policy	Core Strategy Policy 8	Yes - Considered to be sensible both environmentally and in commercial terms.	Noted
Mrs V J Pratt	Wootton Wawen Parish Council	box	Development Management Policy 1	Yes - WCC is quite capable of delivering Policy 1 without any interference from "European Dictat". The policy is quite acceptable as presented.	Noted
Mrs V J Pratt	Wootton Wawen Parish Council	box	Development Management Policy 2	Yes - It is very important to take into account any "unacceptable cumulative impact" - an essential back stop.	Noted
Mrs V J Pratt	Wootton Wawen Parish Council	box	Development Management Policy 3	Yes - In terms of the environment this is a key policy statement.	Noted
Mrs V J Pratt	Wootton Wawen Parish Council	box	Development Management Policy 4	Yes - Very laudible and ambitious - surely there is an issue of public education involved in this development.	Noted and as you rightly say there is an issue of public education that still needs to be addressed.
Mrs V J Pratt	Wootton Wawen Parish Council	box	Development Management Policy 5	Yes - This is a key policy development in putting together the whole "jigsaw". Again the public needs to understand the policy objectives.	Noted
Mrs V J Pratt	Wootton Wawen Parish Council	box	Development Management Policy 6	Yes - Sound thinking and policy. As we found in Wootton Wawen it is all about managing the flood risk.	Noted
Mrs V J Pratt	Wootton Wawen Parish Council	box	Development Management Policy 7	Yes - Practical common sense.	Noted
Mrs V J Pratt	Wootton Wawen Parish Council	box	Development Management Policy 8	Yes - It is important that we set high quality objections as an ongoing policy.	Noted
Mrs V J Pratt	Wootton Wawen Parish Council	question	Question 5	No	Noted
Mrs Elaine Priestley	Lapworth Parish Council	section	1	I appreciate that Lapworth has missed the deadline for comments but was only able to consider this document at last night's meeting. However Lapworth would like to advise that it has no comment other than it believes that those that are employed to consider the options have more expertise than local representatives.	Noted

Mr W Robinson	Stockton Parish Council	question	Question 1	Yes	Noted
Mr W Robinson	Stockton Parish Council	question	Question 2	Yes	Noted
Mr W Robinson	Stockton Parish Council	policy	Core Strategy Policy 1	Yes	Noted
Mr W Robinson	Stockton Parish Council	policy	Core Strategy Policy 2	Yes	Noted
Mr W Robinson	Stockton Parish Council	policy	Core Strategy Policy 3	Yes	Noted
Mr W Robinson	Stockton Parish Council	policy	Core Strategy Policy 4	Yes	Noted
Mr W Robinson	Stockton Parish Council	policy	Core Strategy Policy 5	Yes	Noted
Mr W Robinson	Stockton Parish Council	policy	Core Strategy Policy 6	Yes	Noted
Mr W Robinson	Stockton Parish Council	policy	Core Strategy Policy 7	Yes	Noted
Mr W Robinson	Stockton Parish Council	policy	Core Strategy Policy 8	Yes	Noted
Mr W Robinson	Stockton Parish Council	box	Development Management Policy 1	Yes	Noted
Mr W Robinson	Stockton Parish Council	box	Development Management Policy 2	Yes	Noted
Mr W Robinson	Stockton Parish Council	box	Development Management Policy 3	Yes	Noted
Mr W Robinson	Stockton Parish Council	box	Development Management Policy 4	Yes	Noted
Mr W Robinson	Stockton Parish Council	box	Development Management Policy 5	Yes	Noted

Mr W Robinson	Stockton Parish Council	box	Development Management Policy 6	Yes	Noted
Mr W Robinson	Stockton Parish Council	box	Development Management Policy 7	Yes	Noted
Mr W Robinson	Stockton Parish Council	box	Development Management Policy 8	Yes	Noted
Mr W Robinson	Stockton Parish Council	question	Question 5	No	Noted
Mr M Slater	Butterfly Conservation	question	Question 1	Yes	Noted
Mr M Slater	Butterfly Conservation	question	Question 2	Yes	Noted
Mr M Slater	Butterfly Conservation	policy	Core Strategy Policy 1	Yes	Noted
Mr M Slater	Butterfly Conservation	policy	Core Strategy Policy 2	Yes	Noted
Mr M Slater	Butterfly Conservation	policy	Core Strategy Policy 3	Yes	Noted
Mr M Slater	Butterfly Conservation	policy	Core Strategy Policy 4	Yes	Noted
Mr M Slater	Butterfly Conservation	policy	Core Strategy Policy 5	Yes	Noted
Mr M Slater	Butterfly Conservation	policy	Core Strategy Policy 6	Yes	Noted
Mr M Slater	Butterfly Conservation	policy	Core Strategy Policy 7	Yes	Noted
Mr M Slater	Butterfly Conservation	policy	Core Strategy Policy 8	Yes	Noted
Mr M Slater	Butterfly Conservation	box	Development Management Policy 1	Yes	Noted
Mr M Slater	Butterfly Conservation	box	Development Management	Yes	Noted

			Policy 2		
Mr M Slater	Butterfly Conservation	box	Development Management Policy 3	Yes	Noted
Mr M Slater	Butterfly Conservation	box	Development Management Policy 4	Yes	Noted
Mr M Slater	Butterfly Conservation	box	Development Management Policy 5	Yes	Noted
Mr M Slater	Butterfly Conservation	box	Development Management Policy 6	Yes	Noted
Mr M Slater	Butterfly Conservation	box	Development Management Policy 7	Yes	Noted
Mr M Slater	Butterfly Conservation	box	Development Management Policy 8	Yes	Noted
Mr M Slater	Butterfly Conservation	question	Question 5	No	Noted
Mr Geoff Symes	Kenilworth Town Council	section	1	Thank you for the opportunity to comment upon the latest stage of the proposals. The views of this Council gave at the start of the process remain valid and we will still support the overall proposed strategy. Members are delighted that a key feature is the retention of the Household Waste site in Kenilworth; from our perspective, that is a fundamental element of the local strategy. Please keep us informed of future developments.	Noted

Mr. Phillip Taylor	British Pipeline Association	section	9	Thank you for your letter dated 22 September 2011 which notified us of your forthcoming consultation. The British Pipeline Agency Limited (BPA) owns or manages a number of assets within your Council area. It is a requirement that any development within the vicinity of the pipeline(s) does not encroach onto land which may affect the infrastructure. Whilst your strategic document may not affect BPA operations, any further development may. Therefore it is respectfully requested that your development management teams are passed our details and that any planning applications which may affect the pipeline(s) are accordingly notified and the opportunity to comment permitted. In terms of this consultation BPA has no comment to make.	Noted
Nicola Thompson	Harbury Parish Council	question	Question 1	Yes	Noted
Nicola Thompson	Harbury Parish Council	question	Question 2	Yes	Noted
Nicola Thompson	Harbury Parish Council	policy	Core Strategy Policy 1	Yes - Manages waste within the County as far as possible.	Noted
Nicola Thompson	Harbury Parish Council	policy	Core Strategy Policy 2	Yes - Makes use of current sites rather than new ones. Keeps lorry movements down.	Noted
Nicola Thompson	Harbury Parish Council	policy	Core Strategy Policy 3	Unsure - We would like it made more certain that current sites will not expand and that no new sites should be allowed.	Such a guarantee cannot be given as the strategy is all about ensuring that there is sufficient infrastructure to satisfy the treatment requirements.
Nicola Thompson	Harbury Parish Council	policy	Core Strategy Policy 4	Yes - Sensible arrangement - cuts down on road use to sites further away from settlements.	Noted
Nicola Thompson	Harbury Parish Council	policy	Core Strategy Policy 5	Yes - We need to re-use and recycle as much as possible.	Noted

Nicola Thompson	Harbury Parish Council	policy	Core Strategy Policy 6	Yes - Would like to see energy being produced by this method I preference to landfill with no use.	Noted
Nicola Thompson	Harbury Parish Council	policy	Core Strategy Policy 7	Yes - Landfill should be the last option.	Agreed
Nicola Thompson	Harbury Parish Council	policy	Core Strategy Policy 8	Yes - Safeguards local amenities.	Noted
Nicola Thompson	Harbury Parish Council	box	Development Management Policy 1	Yes - Too much countryside might be devastated without protection.	Noted
Nicola Thompson	Harbury Parish Council	box	Development Management Policy 2	Yes - Pollution could have a devastating effect on countryside and buildings if not carefully controlled.	Noted
Nicola Thompson	Harbury Parish Council	box	Development Management Policy 3	Yes - We are affected by lorry movements to our local tip and would be pleased to see curbs on transportation and use of trains/canals.	Noted
Nicola Thompson	Harbury Parish Council	box	Development Management Policy 4	Yes - To conform with planning guidelines and any local/neighbourhood plans.	Noted
Nicola Thompson	Harbury Parish Council	box	Development Management Policy 5	Yes - Local people need to have access to these amenities at all times.	Noted
Nicola Thompson	Harbury Parish Council	box	Development Management Policy 6	Yes - No landfill should be permitted if there is any flooding risk and all water courses need to be safeguarded.	Noted and agreed
Nicola Thompson	Harbury Parish Council	box	Development Management Policy 7	Yes - Avoids any possible dangers to aircraft.	Noted
Nicola Thompson	Harbury Parish Council	box	Development Management Policy 8	Yes - This means that any development will not harm the environment in the long run.	Noted
Nicola Thompson	Harbury Parish Council	question	Question 5	No	Noted
Rohan Torkildsen	English Heritage	question	Question 1	Yes	Noted
Rohan Torkildsen	English Heritage	question	Question 2	Yes	Noted

Rohan Torkildsen	English Heritage	policy	Core Strategy Policy 2	No - Policy should also refer to the "historic environment". Built, natural & the historic environment. It may also be useful to clarify the importance of safeguarding the setting of these assets. A consideration sometimes overlooked.	Can add the words <u>historic environment</u> to this policy
Rohan Torkildsen	English Heritage	policy	Core Strategy Policy 3	Due to the historic significance of these settlements consideration of the historic environment, individual assets and their settings is an extremely important consideration.	Addressed by the amendment to Core Strategy Policy 2
Rohan Torkildsen	English Heritage	policy	Core Strategy Policy 5	Unsure - Suggest revised to read natural, built and historic environment.	<u>Will look at amending the Policy in line with that suggested</u>

Rohan Torkildsen	English Heritage	box	Development Management Policy 1	First sentence - revise to read natural, built & historic. Features of local importance - can you please add non designated historic buildings of local significance e.g. local uses. Para 9.22 PPS 5 likely to be replaced by NPPF. The expectations could provide a succinct requirement (bullet points) in one form of a policy due to the imprecision of NPPF. Para 9.23 This needs to be rewritten. Either there is an adverse effect or there isn't? i.e if there is acceptable mitigation there will be no adverse impact. Delete last sentence re projects of national importance as these will be matters for the IPC and the National Policy Statements and not this plan. Para 9.22 - 9.26. There is perhaps an over emphasis on archaeological matters rather than heritage assets as a whole. Expectations for the archaeology may well equally apply to other historic features and townscapes. This section could explain the issue of the importance of considering the setting of heritage assets, and cross reference to recent English Heritage guidance published on the matter.	<u>Paragraph 9.23 will be amended as suggested in your response</u>
Rohan Torkildsen	English Heritage	question	Question 5	Do the requirements set out in para 9.22 onwards suggest the need for a specific historic environment policy or are the expectations voluntary?	<u>Not expecting to introduce a specific historic environment policy but it will be reconsidered in the light of your comment</u>
J Twaddle		question	Question 1	Yes	Noted
J Twaddle		question	Question 2	Yes - Note 7. Objective 7. Does this mean 'active' existing waste management sites. An objective relating to the restoration and amenity potential of closed landfill sites e.g. Ryton Pools would be beneficial.	They may not necessarily be active

J Twaddle		policy	Core Strategy Policy 1	Yes	Noted
J Twaddle		policy	Core Strategy Policy 2	Yes - I have some concern over facilities such as anaerobic digestion facilities on contaminated/derelict land. I assume that these will have due regard for proximal residential/commercial uses and the appropriate risk assessment is put in place.	Noted
J Twaddle		policy	Core Strategy Policy 3	Yes	Noted
J Twaddle		policy	Core Strategy Policy 4	Yes	Noted
J Twaddle		policy	Core Strategy Policy 5	Yes - Common sense and in accordance with European Legislation.	Noted
J Twaddle		policy	Core Strategy Policy 6	Yes	Noted
J Twaddle		policy	Core Strategy Policy 7	Yes - Agree that landfill will always remain an important option for domestic wastes.	Noted but only as a last resort option
J Twaddle		policy	Core Strategy Policy 8	Yes - To prevent additional waste management sites. However strict measures are required if a change to the licence conditions are proposed especially a change to the types of waste that can be accepted for example. Also several different types of waste management operation can result in an impact.	Noted
J Twaddle		box	Development Management Policy 1	Yes - Natural Resources, biodiversity and geodiversity.	Noted
J Twaddle		box	Development Management Policy 2	Yes - General common sense to take this approach.	Noted
J Twaddle		box	Development Management	Yes	Noted

			Policy 3		
J Twaddle		box	Development Management Policy 4	Yes - Sustainable Approach.	Noted
J Twaddle		box	Development Management Policy 5	Yes - Common sense.	Noted
J Twaddle		box	Development Management Policy 6	Yes - Because water resources are extremely valuable to future generations. Flood risk.	Noted
J Twaddle		box	Development Management Policy 7	Yes	Noted
J Twaddle		box	Development Management Policy 8	No - There is no definition of what a 'temporary use' is?	Noted
J Twaddle		question	Question 5	Yes - A very worrying decision was made recently on the acceptance of low level radioactive waste at the Kingscliffe site in Northampton. I feel that the overall contamination loadings that go to landfill rather than increase i.e. the aim of the Landfill Directive is to reduce hazardous wastes to landfill. I could not see where this was addressed in the document.	The Landfill Directive does not specifically require the reduction of hazardous waste to landfill as it has clear engineering standards for hazardous waste landfills. The Landfill Directive has diversion targets for biodegradable municipal waste and nothing else.
Sir/madam Unknown	Biffa Waste Services Ltd	section	1	I generally agree with all policies and objectives but would make one comment on Core Strategy Policy 2.	
Sir/madam Unknown	Biffa Waste Services Ltd	policy	Core Strategy Policy 2	Yes In table 8.1 in this policy it lists waste management facilities and possible locations for them. It suggests that buildings with lawful Class B2 and Class B8 uses, or land allocated for these uses, would be suitable for Transfer Stations, HWRC and recycling facilities. However, it does not extend this suggestion to Material Recovery Facilities (MRF). I would contend that MRFs should also be considered suitable for land allocated for, or in use as, Class B2 use. Whilst MRFs do involve more processing than transfer stations, they are akin to many other non-waste industrial processes and so are usually capable of being accommodated in buildings, or on land, allocated for Class B2 use. Clearly they would need to be subject to appropriate environmental controls (as would any other waste management use) but these are regulated by the Environment Agency, and so should have no bearing on the planning	This is an omission as it was felt that recycling facilities would include MRFs but if this is not clear then the Policy can be amended to address your concerns

				principle of use. I hope these comments can be taken into account.	
Sir/madam Unknown	Packington Estate Enterprises	section	1	We have studied the above and have refocused our minds on the March 2010 consultation and our reply. We are pleased to see that our comments have met with a positive response in the September document. We would have given greater prominence to the merits of landfill restoration of quarries, but are pleased to see the mentions you make at: para 4.37 in CS2 on page 34; para 8.7 on page 45; and Policy CS7 (v), paras 8.16 and 8.17 on page 50 We do not propose to quibble on detail and are happy to support this Waste Strategy.	Noted
Sir/madam Unknown	Arup	question	Question 1		
Sir/madam Unknown	Arup	question	Question 2		
Sir/madam Unknown	Arup	policy	Core Strategy Policy 1	Yes - This policy seeks to ensure sufficient provision in terms of both capacity and types of waste management development whilst minimising over-provision and hence the possibility of increasing waste importation into the county. The narrative to Policy 1 should clearly state where the County's waste targets are documented. The narrative refers to targets within the Regional Spatial Strategy (RSS), which will be abolished with the passing of the Localism Bill late 2011/early 2012. Whilst the body of evidence supporting the RSS is relevant, the narrative should be sufficiently future proofed.	Noted

Sir/madam Unknown	Arup	policy	Core Strategy Policy 2	Yes - This policy applies a site preference hierarchy which seeks to preserve green field sites and avoid, as far as possible, development in rural locations.	Noted
Sir/madam Unknown	Arup	policy	Core Strategy Policy 3	Yes - This policy enforces the Proximity Principle for large scale waste sites and it is appropriate that developments of this scale are linked to centres of population and commerce. However, whilst we agree in principle we question whether the application of this policy should be restricted to waste management developments in the lower tiers of the Waste Hierarchy - see response to Question 7.	Noted
Sir/madam Unknown	Arup	policy	Core Strategy Policy 4	Yes - This policy whilst seeking to ensure as much waste management development as possible is close to primary and secondary settlements does acknowledge that small scale waste sites have smaller impacts and therefore development outside of primary and secondary settlements may be justified.	Noted
Sir/madam Unknown	Arup	policy	Core Strategy Policy 5	Unsure - Whilst development policy should apply to all waste management developments equally some large scale waste treatment processes may find it difficult to find appropriately sized development sites close to primary and secondary settlements e.g. open windrow composting. Can the Core Strategic Policies taken into consideration the proposed development's position in the Waste Hierarchy?	<u>That is already an aim of the strategy which perhaps needs to be reinforced</u>

Sir/madam Unknown	Arup	policy	Core Strategy Policy 6	Yes - Development policy should, in general, be applied equally to all waste management development proposals but see above comments in relation to factoring in developments' position in the Waste Hierarchy.	Noted
Sir/madam Unknown	Arup	policy	Core Strategy Policy 7	Yes - As the available evidence suggests there is sufficient consented landfill to meet final disposal needs over the plan period it is appropriate that further landfill should only be brought forward in exceptional circumstances.	Noted
Sir/madam Unknown	Arup	policy	Core Strategy Policy 8	Yes - If landfill diversion and other targets are to be met it is important to safeguard existing development and ensure it can continue to operate without additional risk or burdens. As acknowledged waste management sites can suffer from 'bad neighbour' development too.	Noted
Sir/madam Unknown	Arup	box	Development Management Policy 1	Yes - It is critical that all new development, not just waste management related development does not have an unacceptable or unmitigated impact on the existing natural and built environment. New development should, as far as practicable, enhance and add to what is already there. This policy should acknowledge the need to avoid unacceptable impacts on and demonstrate where possible positive impact on the local economy and wider socio-economic considerations.	Noted

Sir/madam Unknown	Arup	box	Development Management Policy 2	<p>Unsure -The list of potential areas of impact is not exhaustive, and would be decided through an appropriate EIA screening and scoping procedure in line with EIA legislation. The list should include socio-economic effects, landscape, archaeology/cultural heritage and public access and recreation. The policy should more clearly emphasise the requirement to acknowledge in-combination impacts as a result of other development proposals, and require applicants to discuss other development proposals with the local authority. The policy should also emphasise the need to acknowledge cumulative impacts on one receptor and the potential need for combined mitigation proposals.</p>	<p><u>Consideration will be given to your suggested additions when finalising this policy.</u></p>
Sir/madam Unknown	Arup	box	Development Management Policy 3	<p>No - Whilst waste is transported by various transport modes the majority of waste is transported by road. Rail transfer is only economically for very large quantities and would require significant extra capital investment in railheads in addition to the waste management development itself. There are similar additional infrastructure and investment costs in relation to transport by water and the speed of travel may possibly restrict the type of wastes that can be carried e.g. canals are used the maximum speed of travel would be 4mph. This policy would be better focused on making road transportation as sustainable as possible, and, possibly, navigable waterways if these are a practical option within Warwickshire.</p>	<p>To exclude rail and canal transport just because they appear to be uneconomic would not be acceptable although the comments you are making are likely to be the reality.</p>

Sir/madam Unknown	Arup	box	Development Management Policy 4	<p>Unsure - The requirement to produce 10% of the development's energy needs on site may hinder development as the cost of achieving this requirement could make the difference between the development going ahead or not and, therefore may ultimately impact on the general economic development of Warwickshire. Obviously, those waste developments which recover energy will have no difficulty in addressing the requirement but for other types of waste management development the requirement may create additional planning hurdles e.g inclusion of a wind turbine on-site. A caveat to this policy should be considered which would allow its waiver in the event that appropriate evidence demonstrates the requirement would render the development unviable. The policy could refer to a BREEAM on equivalent standard as a design requirement; this would provide a wider range of sustainability options for the developer to consider in achieving a sustainable proposal. The Policy should also require a high quality of design with an appropriate level of innovation and respect for local surroundings. The policy should also require applicants to demonstrate how pre-application consultation feedback has been taken into account in the scheme design.</p>	Your comments are noted
Sir/madam Unknown	Arup	box	Development Management Policy 5	Yes - See response to Question 11.	Noted
Sir/madam Unknown	Arup	box	Development Management Policy 6	Yes - Protection of water quality including from flood risk is paramount.	Noted
Sir/madam Unknown	Arup	box	Development Management Policy 7	Yes -The consequences resulting from aviation accidents, particularly involving passenger carrying aircraft, far out-weigh any waste management development need.	Noted

Sir/madam Unknown	Arup	box	Development Management Policy 8	Yes - This policy is necessary to ensure such developments are genuine and not an attempt to circumvent planning and environmental constraints relating to waste management, leading to the setting up of 'fringe' waste management developments.	Noted
Sir/madam Unknown	Arup	question	Question 5	Within the Development Management Policies there should be a clear requirement for appropriate pre-application consultation, in line with the key objectives at the start of the document.	Although pre-application discussions are useful there are no statutory drivers to support this.
Mr Malcolm Watt	Cotswolds conservation Board	section	2	The following is the response of the Cotswolds Conservation Board ("the Board") to the above consultation. The Board is supportive of the vision, objectives and policies set out in the consultation with the following exception: Policy DM1 - Protection of the natural and built environment The Board would suggest that the word "conserve" is substituted for "protect" both in the Policy and elsewhere in the supporting text. This change would ensure that the policy better reflects the underlying legislative requirements and suggests a more pro-active approach. The Board is pleased to note the reference to the AONB Management Plan in paragraph 9.28 of the supporting text to this policy.	<u>Agree to substitute the word "protect" with "conserve" in Policy DM1</u>

Mr P Webster	Forestry Commission	section	1	Thank you for the invitation to comment on the strategy. The Forestry Commission is the government department responsible for woodlands and forestry and therefore wish to see the safeguarding of existing forests and woodlands in Warwickshire and, where appropriate the creation of new woodlands. From my interpretation the strategy does not indicate that trees or woodlands will be affected and therefore I have no further comments.	Noted
Laura Weston	Gloucestershire County Council	section	1	Please note that these are an officer response and have not received member approval.	Noted
Laura Weston	Gloucestershire County Council	policy	Core Strategy Policy 7	'Gloucestershire County Council had previously raised comment on the need for a landfill policy and for the County to become self-sufficient in terms of hazardous waste. We are pleased to see the inclusion of a landfill policy and a method for hazardous waste applications to be judged.	Noted

Mr Richard Wheat	Warwickshire Wildlife Trust	section	1	<p>Thank you for your letter dated 05/10/2011, inviting Warwickshire Wildlife Trust's comments on the above consultation. Warwickshire Wildlife Trust is the leading local charity dedicated to the protection and enhancement of wildlife and natural habitats in Warwickshire, Coventry and Solihull. We are working to promote the interests of wildlife, wild places and the natural environment for the wider benefit of society and local communities. The Trust has a vision of a Living Landscape, a recovery plan for nature, which principally aims to create a resilient and healthy environment rich in wildlife and to provide ecological security for people. The Trust has reviewed the Warwickshire Waste Core Strategy revision and broadly supportive of the spatial approach and policy direction at this stage. We welcome the County Council's commitment to embed the protection and enhancement of biodiversity and the natural environment into the vision, objectives and policies of the plan and recommend that such provisions are taken forward in future revisions of the Core Strategy. The Trust would also like to make the following comments and recommendations.</p>	Noted
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Mr Richard Wheat	Warwickshire Wildlife Trust	section	1	<p>General Comments The Trust welcomes the addition of Local Wildlife Sites and Local Nature Reserves on the constraints map in figure 3.3. As mentioned above, we recommend that this map is linked to policy CS2 to ensure that all wildlife sites (statutory and non-statutory) are listed and identified as constraints to development within the broad priority areas. As strategic sites come forward as part of the preferred spatial option, it will be necessary to review the Habitat Regulations Assessment in accordance with the conclusions of the HRA screening report. The Trust recommends that Natural England are contacted to discuss this requirement further but would welcome the opportunity to consult on the ongoing HRA process for any strategic waste site allocations.</p>	Noted
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Mr Richard Wheat	Warwickshire Wildlife Trust	section	5	<p>Vision The Trust is generally supportive of the Warwickshire Waste Development Framework vision detailed in paragraph 5.3. We are pleased to note that both the protection and enhancement of the natural environment has been referenced in this vision and believe that this provides a context for the objectives and policies detailed within the plan.</p> <p>Objectives The Trust is supportive of objectives 6 and 8 which further expand on the strategy vision to protect and enhance the natural environment and to promote high quality and sustainable design within new waste infrastructure. We welcome the retention of PPS9's avoid, mitigate hierarchy for adverse impacts on the natural environment from Emerging Options document and believe that this principle should be embodied into relevant core policies for strategic site selection.</p>	Noted
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Mr Richard Wheat	Warwickshire Wildlife Trust	policy	Core Strategy Policy 2	<p>Whilst the Trust supports the preferred spatial option in principle, we believe that greater reference to the protection of the natural environment is needed within the spatial policies if the vision is to be realised. With new waste infrastructure being prioritised within the broad areas outlined in figure 7.1, it is essential that clear guidance is given about the relative constraints that will apply during strategic site selection (such as those listed on the constraints map detailed in figure 3.3). Policy CS2 goes part way to achieving this for statutory wildlife sites; however there is no requirement to avoid non-statutory sites. The Trust believes this fails to implement the 'avoid adverse impacts first' principle from the very outset of the spatial planning process. In turn, to deliver the sustainable waste infrastructure envisaged in the spatial vision and objectives, and to adhere to the local authority's duty under section 40 of the NERC Act 2006, it is strongly recommended that policy CS2 should be expanded to ensure that non-statutory sites are also listed as a constraint to new waste development within the broad spatial approach.</p>	<u>?</u>
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Mr Richard Wheat	Warwickshire Wildlife Trust	box	Development Management Policy 1	<p>Note: It is noted that policy DM1 does require avoidance and mitigation of adverse impacts on non-statutory sites but this policy appears to be applicable only after strategic sites have been selected. It is considered that policy DM1 therefore specifically relates to the design of the development and not to the spatial selection of strategic sites. Policy DM1 The Trust welcomes the inclusion of policy DM1 to promote the protection and enhancement of biodiversity and the natural environment within the design and layout of all new waste developments. As referenced above, we believe new waste infrastructure should be spatially planned to avoid statutory and non-statutory sites from the outset; however the provision on DM1 will ensure that any residual and cumulative impacts are avoided or mitigated accordingly. We specifically support the reference to potential Local Wildlife Sites and LBAP Habitats and species within the list of regionally and locally important features. We believe that the consideration of these features within the design and layout of a waste infrastructure development will be essential to deliver the biodiversity protection and enhancement promoted throughout the plan. Policy DM1 also requires the protection and enhancement of open space and recreational areas and refers to the areas specifically outlined in Local Development Plans as being of specific importance. The Trust believes that this statement should include a reference to Green Infrastructure (GI) networks and subsequent local authority GI strategies as these will also be of strategic importance in supporting the growth within their respective areas. Additional Policy - Planning Obligations It is currently understood that all local authorities in the Warwickshire, Coventry and Solihull sub-regional green infrastructure SPD. This SPD is intended to secure developer contributions throughout the participant areas towards the delivery of a sub-regional GI network. Part of this work takes account of the recent sub-regional GI Study that was undertaken by Land Use Consultants for Natural England. What this study and the proposed SPD will impose on local planning authorities is unclear at this stage but it is likely that planning obligations or a Community Infrastructure Levy (CIL) will have a fundamental role in its delivery. It will therefore be necessary for Warwickshire County Council to account for this scheme as part of a specific planning obligations/CIL policy in the Waste Core Strategy. The Trust recommends that further discussions with Dave Lowe of Warwickshire County Council (lead), interested stakeholders and delivery partners is undertaken at the first available opportunity to consider how this can be effectively integrated within the development management policies. Warwickshire Wildlife Trust would welcome the opportunity to contribute towards these discussions. In addition, the Coventry, Solihull and Warwickshire Association of Planning Officers (CSWAPO) have recently submitted an expression of interest to DEFRA to participate in a pilot scheme for biodiversity offsetting. Biodiversity Offsets introduce a clear and systematic method</p>	?
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				<p>of ensuring adequate mitigation and compensation is provided for impacts on biodiversity. To enable this, a matrix assessment is used to calculate the level of impact, based on a variety of different factors and multipliers so that developers can take account of the costs of offsetting their impacts on biodiversity from an early stage of the development process. The biodiversity offsetting scheme is again in the development stage but is unlikely to involve the use of planning obligations to enable the necessary compensation to be delivered offsite where appropriate. This scheme may have links to the aforementioned sub-regional GI requirements and so further clarity will be needed on this matter. However, based on Warwickshire County Council's commitment to take part in this pilot, it is advised that the Waste Core Strategy includes some acknowledgement of this scheme within an integrated planning obligations/CIL policy.</p>	
		question	Question 1		
		question	Question 2		
		policy	Core Strategy Policy 1		
		box	Development Management Policy 2		

Emerging Spatial Options Consultation – March 2011

Representor : 1 Mr Philip Hirst (BPA)

Heading	Nature of Response	Response / Representation	Officer comments
Waste Core Strategy - Emerging Spatial Options (March 2011)	Observations	BPA request that the rights of statutory consultation on all planning matters are maintained within our pipeline Area of Interest or easement.	Noted

Representor : 1135 Mr Neil Cox (Lichfield District Council)

Heading	Nature of Response	Response / Representation	Officer comments
Waste Core Strategy - Emerging Spatial Options (March 2011)	Other	Thank you for the opportunity to comment on this document. I can advise that I have no comments to make.	Noted

Representor : 1136 Professor R. D. Langman

Heading	Nature of Response	Response / Representation	Officer comments
Question 1	Object	Paragraph 1 should state a percentage target for the minimisation of waste generated. Otherwise there is no check on the success of the strategy.	Targets are already set at a European and National level and should not be repeated

Question 2	Object	Again, where possible specific targets should be set (numerically). The sixth objective should be enhanced e.g. communities by public consultation.	Objective 6 will be amended as suggested
Question 3	Observations	13 key issues are too many to get the mind around. If you feel these are appropriate then some sort of priority should be selected. I would select 6.7 as being the most important.	Unsure why 'hazardous waste management' would be most important, particularly when hazardous waste management is largely undertaken at the regional level and there does not appear to be a shortage of available capacity over the short term.
Question 4	Observations	Nothing is stated about the periodicity of individual "practices". For example: 6.4self sufficiency, agreed timing of services and proximity Thus in general there is little sense of the urgency in implementing many of these services.	Noted
Question 5	Support with conditions	An attempt is made to deal with the source of waste in regard to the closeness of its handling. However what is meant by "sustainable transport systems" could be anything ...even energy sustainable - i.e electric vehicles!	Noted. 'Sustainable transportation' will be defined as "alternatives to road transportation". Where road transportation is the only method of waste transportation, the developer will need to demonstrate that waste transportation is kept to a minimum, the highway network is suitable, there will be no unacceptable detrimental impact to road safety and there will be no unacceptable impact on the environment or local communities.
Question 6	Support with conditions	However aspects of Policy 3 cannot be ignored. The use of brown field sites in areas of high population might be necessary to achieve efficiency of waste management.	Noted

Question 7	Support with conditions	See 6 above.	Noted
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Question 8	Observations	I am unsure of the effective difference between 3 & 4.	The difference is that an array of sites may help to treat municipal and C&I waste and therefore help to meet the 'treatment gap' (Policy Principle 4) but not all of these sites may be 'strategic' (Policy Principle 3). This question seeks a robust definition for 'strategic sites' as the locational strategy for strategic and non strategic sites may be different.
Question 9	Observations	There is much to commend this option - is it likely to involve more objections from the communities? OVERALL you need to give an opinion on the likely nature of objections (this is not to be confused with "disadvantages")	Noted. It is likely that the next consultation document will include a policy on managing the health and amenity impacts of waste development as this will be the main focus of objections. For waste developments, they are most likely to include (but not exclusively) noise, lighting/illumination, visual intrusion, vibration, dust, odour, contamination, transport etc.
Question 10	Observations	Do not feel qualified to judge.	Noted
Question 11	Observations	Should there be an assessment of the geographical nature of where the principal sources of this waste occurs and thus the nature of the problem?	Noted – further work is being undertaken on the Background Technical paper to identify the areas of highest waste arisings. However, this information is not available for all waste streams.
Question 12	Object	There should be an emphasis of dealing with all waste including hazardous within the county, UNLESS some wastes are of such a level that commercially there is no alternative to exporting.	The plan does not prevent any waste being treated in the county. In terms of hazardous waste there are only relatively small amounts of waste which through economies of scale tend to be treated in larger facilities in other parts of the region.
Question 13	Object	See 12.	Noted
Question 14	Support with conditions	Of course this is logical but is there a limit to the capacity of some of these sites where do you think they will arise?	Waste site permitted capacities are set out in the Background Technical paper. However, the primary purpose of safeguarding is to provide a mechanism that allows WCC to object, where necessary, to any proposals for non waste development that may prevent or

			unreasonably restrict the use of that site for approved waste management purposes.
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Question 15	Support	There seems no other real alternative.	Noted
Question 16	Support with conditions	Again logical - but should there be a reference to minimising interaction with water bearing substrates.	Reference to the natural environment already covers the water environment
Question 17	Support	You have no real alternatives!	Noted
Question 18	Support with conditions	<p>A) 5.</p> <p>The philosophy should be to make the sources of waste pay for its disposal. By having a close geographical association with disposal the population can appreciate more directly needs. This philosophy helps to define "close proximities"!</p> <p>B) It would be helpful to have an assessment of the actual tonnages of waste materials. e.g scrap metal - is Warwick a priority area?</p>	<p>Comments noted. The decision as to which spatial option will be taken forward for consultation will be made once all of the representations have been considered and the options have been evaluated through a Sustainability Appraisal.</p> <p>Further work is being undertaken on waste types. This information will be provided for comment in the Background Technical document to be published in September 2011.</p>

Representor : 1137 Mr Peter Bridgewater

Heading	Nature of Response	Response / Representation	Officer comments
Question 1	Object	Put in a specific measureable, achievable, realistic as well as a time bound target for waste generated and waste sent to landfill. "Will be minimised" is vague and will always be achieved "in the circumstances".	Targets set at the European and National level and should not be repeated

Question 2	Object	Too vague and "motherhood and apple pie". All these are generally "good things" but are not specific enough to measure or commit the district.	Will consider making the objectives smarter and measurable.
Question 3	Object	There is a key carbon (CO2) reduction issue in managing and transporting waste. This is not addressed or specifically recognised.	Sustainable solutions and carbon management go hand in hand
Question 4	Object	Carbon reduction (CO2) end to end impact including: - Benefits of packaging - Transport - Energy used - Energy from waste - Methane avoided	As above
Question 5	Support		Noted
Question 6	Support		Noted
Question 7	Object	Strategic sites should also consider overall CO2 impact - e.g efficient low carbon transport of waste. E.g. using railways or waterways.	Noted, although is sustainable transportation only one criteria in justifying whether a waste site is 'strategic'? What about throughput or site size? We will take into account all comments received in terms of the issue of 'strategic sites'. It is likely that this will be a key issue for consideration at the next consultation stage.
Question 8	Support		Noted
Question 9	Object	Needs to include a carbon reduction specific target.	See response to Q2
Question 10	Object	Needs to include a carbon reduction specific target.	See response to Q2
Question	Observations	To include a CO2 reduction specific target.	See response to Q2

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Question 12	Support		Noted
Question 13	Object	The policy must contain a climate change mitigation impact target especially for agricultural waste and sewage sludge.	The waste core strategy will not be identifying treatment options for organic agricultural waste and sewage sludge as they are dealt with outside of the framework. The treatment gap referred to elsewhere in the document did not reflect the needs for agricultural or the water undertakings
Question 14	Object	The most effective and efficient sites should be used and less effective sites used for non-waste purposes.	Agreed but the efficiency and effectiveness is already addressed through the permitting regime
Question 15	Object	Landfill is not necessarily the least desirable option for inert waste. Consider CO2/climate change impacts.	Landfilling of inert waste should be discouraged with a preference of recycling and recovery at source
Question 16	Support		Noted
Question 17	Object	Being a statutory requirement this does not need to be a policy unless more stretching targets are being proposed (which they are not). Do not waste space, breath and paper with vacuus policies please.	Noted – these comments will

Question 18	Observations	<p>A) Preferred Spatial Option 5.</p> <p>Least transport required. Few real disadvantages. The 1st and 3rd 'disadvantages' are just work to be done anyway.</p> <p>B) Maximise CO2 (and green house gas) reductions.</p>	<p>Comments noted. The decision as to which spatial option will be taken forward for consultation will be made once all of the representations have been considered and the options have been evaluated through a Sustainability Appraisal.</p>
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Representor : 1138 Mr Mike Slater

Heading	Nature of Response	Response / Representation	Officer comments
Questions 1-3	Support		Noted
Question 5	Support with conditions	6.8 some waste hazardous products e.g chalk slurry could be used to create wildlife habitat (calcareous grasslands).	Noted
Questions 6 - 14	Support		Noted
Question 15	Support with conditions	There should be a policy to restore landfill sites to wildlife/country park areas.	Noted – the final policy on landfill restoration needs to be sufficiently flexible to discourage landfill, yet enable landfill where there is a need/waste cannot be managed at a higher level of the waste hierarchy restoration and there would be significant environmental benefits would result from the development.

Question 16	Support	Should protect local environment and biodiversity.	Noted – there will be policies on environmental protection and biodiversity.
Question 17	Support		Noted
Question 18	Other	No comment.	Noted

Representor : 1139 Rachel Hamblin

Heading	Nature of Response	Response / Representation	Officer comments
Question 1	Support with conditions	In theory it is good however there does need to be increased emphasis on supporting smaller waste management companies operating sustainably and helping and supporting them through the planning process.	Noted. It is acknowledged that a mixture of small and large waste management companies can play a part in delivering sustainable waste management.
Question 2	Support		Noted
Question 3	Support		Noted
Question 4	Observations	Investment in new technologies to manage waste needs to be encouraged.	Encouraging investment in new technologies may be beyond the scope of the Waste Core Strategy as it is primarily a land use planning document. However, it is acknowledged that there is likely to be significant investment in new technologies over the plan period and this will ensure that waste is managed even more sustainably in the future..

Question 5	Support with conditions	I agree with the policy directions because the policy states the intention to be able to manage waste within the county, this is important and is also a driver for economic growth and employment where new waste facilities are encouraged.	Noted
Question 6	Support with conditions	This needs to be looked at once consultation has been received.	Noted – the comments received for the Emerging Spatial Options consultation will be used to produce the Preferred Option and Policies consultation document.
Question 7	Support with conditions	I agree in principle with the definition of strategic site - perhaps this should include provision of location with regard to final destination of wastes for example transfer/civic amenity sites in need to be located strategically with regards to other treatment sites.	Noted. We will take into account all comments received in terms of the issue of 'strategic sites'. It is likely that this will be a key issue for consideration at the next consultation stage.
Question 8	Support with conditions	However the identification of a treatment gap should definitely include all waste types (construction and demolition and hazardous).	Noted, however it is accepted that due to the specialist nature of hazardous waste and the relatively small volumes produced, treatment facilities can be regional or sub-regional in nature. The quality of information on C&D waste is also relatively poor. For these reasons, the WMRSS Phase 2 Revision did not provide treatment gaps for these waste streams. However, the quality of C&D waste information may improve over the plan period and the WDF monitoring framework will need to be adaptable to take account of this.
Question 9	Support		Noted
Question 10	Support		Noted

Question 11	Support with conditions	In theory yes I agree, however there needs to be more support and guidance on what to do with the inert waste once it has been treated /recycled as many smaller companies are struggling to find an end-use that makes the treatment process economically viable.	Noted but economics need to be addressed to ensure that it is viable under all circumstances
Question 12	Support with conditions	I also agree that it is more practical to treat/stabilise hazardous waste at larger specialised facilities.	Noted
Question 13	Support		Noted
Question 14	Support with conditions	I very much agree with this as it protects the smaller independent operators who are working well.	Noted
Question 15	Support with conditions	I think that this is the correct direction but that the emphasis should be on other methods i.e energy from waste where some benefit is derived from waste disposal.	The Core Strategy seeks waste to be managed in accordance with the principles of the Waste Hierarchy, which includes recovery through energy from waste. For any proposal to landfill, the applicant will need to demonstrate that the waste cannot be managed in a way that would be at a higher level of the Waste Hierarchy.
Question 16	Support with conditions	The protection of the environment should be paramount but the emphasis on immaculate and expensive site design should not 'squeeze out' the smaller independent operators.	Agreed and noted
Question 17	Support		Noted

Question 18	Observations	<p>A) Preferred Option 1</p> <p>Because it allows for the focus of development to be on previously developed areas and to incorporate waste facilities that have existing and established transportation routes. The majority of these locations are located within or nearby to the larger urban areas, and those that are would clearly be preferential. I strongly feel that every potential site should be judged on its individual merits with regards to location, transport and source of waste. I also think that locations need to identified that could be 'earmarked' for new ventures i.e. energy from waste facilities and new technologies in order to support applications of this nature. Location with regards to residence would be a big factor for this type of development due to negative public perception halting similar projects. This may mean that planning for facilities like this may require more support at more rural locations, or those locations that are slightly removed from urban centres.</p> <p>B) Not at this time.</p>	<p>Comments noted. The decision as to which spatial option will be taken forward for consultation will be made once all of the representations have been considered and the options have been evaluated through a Sustainability Appraisal.</p>
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Representor : 1140 Mrs Ruth Buswell

Heading	Nature of Response	Response / Representation	Officer comments
Questions 1 - 3	Support		Noted
Question 4	Observations	Careful siting of any new facilities built in the future.	Policies on the siting of new facilities will be covered under national planning policies and those set out in the adopted Waste Core Strategy.

Question 5	Other	Unsure.	Noted
Questions 6 - 7	Support		Noted
Question 8	Support with conditions	But consultation must be continued if any additional sites are to be provided.	Noted – if any sites are to be allocated as part of the WDF, consultation is a statutory requirement. Further consultation would also need to be undertaken at the planning application stage.
Question 9	Support with conditions	Recycling is the way forward, landfill is not sustainable.	Noted – the Core Strategy seeks to discourage landfill. Permission will only be granted where an applicant has demonstrated that the waste cannot be managed at a higher level of the Waste Hierarchy and other special circumstances apply.
Question 10	Support	As question 9.	As above
Question 11	Support with conditions	The use of site management plans should be mandatory, not optional and be closely monitored.	Site Waste Management Plans are mandatory requirement for construction projects of over £300,000 (exc. VAT) under the Site Waste Management Plans Regulation (2008).
Question 12	Support with conditions	I agree, but why is hazardous waste being imported into this county when refuse disposal is already a problem.	Market forces and permit conditions make this unpreventable but it should be noted that Warwickshire also exports hazardous waste
Question 13	Other	Radioactive waste should be dealt with at a central point with experts to monitor the process.	Radioactive waste is managed by the Environment Agency through the auspices of the Radioactive Substances Act.
Question 14	Support		Noted

Question 15	Support with conditions	But with regard to green belt and environmental conditions.	Any proposal would have to accord with the appropriate green belt and environmental protections policies of the Development Plan.
Question 16	Support with conditions	But careful monitoring and checking must be in place to prevent any slip in standards.	Noted
Question 17	Support with conditions	If the policy is sustained.	Noted
Question 18	Observations	A) Preferred Option 5 Less distance to transfer waste by road, causing less environmental impact. B) No	Comments noted. The decision as to which spatial option will be taken forward for consultation will be made once all of the representations have been considered and the options have been evaluated through a Sustainability Appraisal.

Representor : 1141 Mr Leonard Gale (resident)

Heading	Nature of Response	Summary of Response	Response / Representation	Officer comments
Question 1	Support with conditions	Success to be more measurable	With regard to previous comments I tend to agree that they are soft and can be interpreted later to mean successful in what ever circumstances prevail at that time. I support the view that a higher degree of measurability is needed.	Targets set at the European and National level and should not be repeated

Question 2	Support with conditions	Access Road Condition and suitability.	One of the most constant complaints about waste sites is not so much the nuisance of it being there, as most accept that they have to be somewhere, but the access to them. Small country lanes having very large vehicles using them is always going to be contentious. Greater emphasis on ensuring that the access roads are of sufficient high standard to remove the complaints.	Noted – it is intended that there will be policy on sustainable transportation where developers must demonstrate that the highway network must be suitable to accommodate lorry movements, that it will not result in a detrimental impact to road safety, the proposed access arrangements are safe and convenient and the transportation will not result in an unacceptable impact on the environment to local communities.
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Representor : 1142 Packington (Packington Estate Enterprises Limited)

Heading	Nature of Response	Response / Representation	Officer comments
Question 1	Support with conditions	It might be extended to say that what landfill is needed should be targeted at restoring mineral workings to an economic after use.	The principle to restore mineral workings is a good one but they are not necessarily suitable for landfilling. The waste hierarchy does allow landfill to be considered but as a last resort option
Question 2	Object	Agree 1-6 and 8. Disagree No 7. It was unhelpful to refer to PPS 10 without page or paragraph reference. We could NOT find the definition of "inappropriate development". (See covering letter).	Will ensure that "inappropriate development" is properly referenced
Question 3	Support with conditions	Waste sites should help restore mineral workings. This should be a key issue.	See response to question 1 above
Question 4	Observations	Yes - see question 3.	See response to question 1 above
Question 5	Object	We should add the importance of restoring mineral workings to positive after uses.	See response to question 1 above

Question 6	Object	We are only concerned with Waste Disposal Sites of a landfill nature. The rest we have no particular view. Where landfill is required then we say your Chapter 8 options do not (as yet) include the mineral workings restoration option.	See response to question 1 above
Question 7	Object	If our point about mineral workings restoration is accepted, then we are not sure whether such sites should be classified as strategic.	See response to question 1 above
Questions 8 - 13	Support		Noted
Question 14	Object	This policy seems to us to be unnecessary and might stifle enterprise. We suggest deletion.	The safeguarding of existing sites from further development is a key element if objections to new waste infrastructure is to be avoided
Question 15	Object	7.16 mentions quarry restoration - hoorah! Landfill should be encouraged as it is "an important component of many quarry restorations".	Positively encouraging landfill would not promote waste management that accords with the principles of the Waste Hierarchy. However, the Core Strategy will need to be flexible to enable landfill development at sites where it is demonstrated that certain special circumstances or criteria apply.
Question 16	Object	Quarry restoration should be prominent. (See covering letter). Policies expressed in extreme and absolute terms will come back to haunt you. We suggest you soften the absolutes of "No" and "highest" in the policy. The general theme we agree with. We do not understand what sustainable construction principles are?	"Sustainable construction principles" might include the use of recycled materials,
Question 17	Support		Noted

Question 18	Observations	<p>A) One that is re-drafted to include quarry restoration as key. On minerals (and probably waste) it seems to us that Warwickshire advises and takes account of Solihull. The Packington Estate is partly in Warwickshire and partly in Solihull. There are two mineral working capacities in the Solihull part of the Estate which will need restoration material and waste in the plan period.</p> <p>B) An option to help waste be used to restore mineral workings.</p>	<p>Comments noted. The decision as to which spatial option will be taken forward for consultation will be made once all of the representations have been considered and the options have been evaluated through a Sustainability Appraisal.</p> <p>It is intended that a policy that addresses restoration of mineral workings will be included in the next consultation document.</p>
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Representor : 1143 Mr. Clive Thomas

Heading	Nature of Response	Response / Representation	Officer comments
Question 4	Support	<p>We should build refuse destructors on brownfield sites to produce energy (electricity or steam for heating)</p> <p>When new leisure centres or schools are being built a refuse destructor should be close by to produce energy to cut costs for these buildings.</p> <p>There may be an opportunity here in Stratford as the leisure centre is past its sell by date and there are some initial discussions going on about selling the site and building a new one on another site. This concept is not new I went to school in Hereford in the 50,s and the Municipal swimming pool was next to the refuse destructor and all the heating was provided by burning the towns rubbish much greener than burying it and producing methane.</p>	<p>Comments noted. The Waste Core Strategy would not prohibit such proposals coming forward. However, with the need to manage waste in accordance with the principles of the Waste Hierarchy, it would have to be demonstrated by the developer that the waste could not be re-used or recycled. The developer would also have to demonstrate at the planning application stage that the proposal would accord with all relevant policies of the development plan, e.g. design, environmental and community protection , sustainable design etc.</p>

Representor : 1144 Dorothy Mitchell (Studley Parish Council)

Heading	Nature of Response	Response / Representation	Officer comments
Question 1	Support	Yes	Noted
Question 2	Support	Yes	Noted
Question 3	Support	Yes	Noted
Question 4	Observations	A policy on decommissioning and site restoration should be adopted as a matter of urgency.	Noted
Question 5	Support	This ensures that consideration of and use of the waste hierarchy is used while protection of health and environment is maximised.	Noted
Question 6	Support with conditions	Yes - if the waste transfer station shown to the north west of Studley is for construction and demolition waste we agree but as close to Worcestershire border should not be used by Worcestershire unless charged for the use.	The Slough waste transfer station is permitted to process both C&D and C&I wastes. Whilst the Waste Core Strategy encourages the management of waste in accordance with the principles of proximity and self sufficiency, the strategy is unable to prohibit waste flows into and out of the County
Question 7	Support	Yes - Because the policy stipulates reduction in waste to landfill and aims to site new waste management facilities close to major centres.	Noted
Question 8	Support with conditions	Yes - the treatment gap has been stemmed by further planning permissions but it must be acknowledged that with Warwickshire waste tonnage growing and coverage only 1/10 more, further planning permissions will be needed.	Noted

Question 9	Support	Yes - given a yearly increase of 3% it would appear that Warwickshire is on course to meet its 2015 target. The Government should bring pressure on manufacturers to reduce packaging much of which is unnecessary.	Comments noted. Whilst we agree that manufacturer packaging needs stricter controls to reduce the volumes of unnecessary waste, this is outside the remit of the Waste Core Strategy.
Question 10	Support	Yes - reiterate remarks for Q9.	As above.
Question 11	Other	Unsure - not confident from the evidence in the strategy that Warwickshire will be able to cope without stronger controls on industry.	Industry has to recognise the role it has to play to ensure that we value waste as a resource and if these needs stronger controls then so be it
Question 12	Support with conditions	Yes - provided that vigorous measures are taken to ensure a) that minimal amounts are imported; b) maximum amount is treated; and c) pressure should be brought on Government to relax methods of dealing with 'white asbestos' which is chemically different to 'blue asbestos'.	Your comments are noted and supported but unfortunately market forces dominate the waste industry. As far as your comment on asbestos is concerned this is agreed but unfortunately the definition is made at the European level where all forms of asbestos are considered to be hazardous and have to be managed in the same way
Question 13	Support with conditions	Yes - close checks should be made on medical facilities producing used syringes, gloves etc. as well as radio-active waste. Such checks must be included in the policy.	Monitoring of permit compliance is a matter for the Environment Agency
Question 14	Support	Yes - this will ensure further usage which will not be curtailed by other planning permissions.	Noted
Question 15	Support	Yes - landfilling of quarries and open-cast mine areas should cope with required capacity, but there could be further capacity arising due to on-going quarrying in the south.	Noted
Question	Support	Yes - agree with the highest standards of	Noted

16		operational practice must be used to ensure local environments are protected.	
Question 17	Support	Continued monitoring is essential through annual reports and other targets and objectives together with thorough investigation of reports by local residents of any transgressions.	Noted
Option 3	Support	<p>1) It is sited on industrial estate, brownfield industrial and within existing waste management facilities near settlements of over 6000 people.</p> <p>2) Sites are within reasonable distance of the main settlements</p> <p>3) As such the movement of waste arisings to the sites will produce the minimum disturbance to residents.</p>	Comments noted. The decision as to which spatial option will be taken forward for consultation will be made once all of the representations have been considered and the options have been evaluated through a Sustainability Appraisal.

Representor : 1145 Planning Northamptonshire

Heading	Nature of Response	Response / Representation	Officer comments
Question 1	Observations	The vision statement is quite generic and could equally apply to any authority. Where possible it should be made to reflect Warwickshires particular circumstance.	Agreed but vision statements are always likely to be generic in nature
Question 2	Object	Key objectives are quite generic and do not have a locally-specific view.	Noted. Further work will be undertaken on the objectives to make them more locally distinct
Question 3	Support		Noted
Question 4	Support	Key issues are adequate.	Noted

Questions 5 - 6	Support		Noted
Question 7	Support with conditions	Criterion for strategic sites should also include 'Those sites, that if the site does not come forward for development, would significantly impede implementation of the plan'.	Noted and the policy principle will be amended to reflect your suggestion
Question 8	Support		Noted
Question 9	Object	Essentially re-iterates the vision and policy principle 4.	Noted
Question 10	Object	Essentially re-iterates the vision and policy principle 4.	Noted
Questions 11 - 13	Support		Noted
Question 14	Support with conditions	Need to define 'significantly'.	Noted – this will be considered in the next stage of the plan.
Question 15	Support with conditions	Inert waste should, where possible, support restoration of mineral sites.	It is acknowledged that inert waste can provide benefits through the restoration of mineral sites. The Waste Core Strategy would not prohibit this from happening. However, in managing waste in accordance with the principles of the Waste Hierarchy, the developer would need to demonstrate that the waste could not be managed at a higher level of the waste hierarchy, i.e. re-used, recycled or recovered.
Questions 16-17	Support		Noted
Option 1	Object		Noted
Option 2	Object		Noted
Option 3	Object		Noted

Option 4	Object		Noted
Option 5	Support	Provides for a greater range of locations to suite a variety of facilities (and management) options.	Noted

Representor : 1146 Mr Richard Gray (CSWDC)

Heading	Nature of Response	Response / Representation	Officer comments
Question 1	Support with conditions	Suggest adding to the end of the first paragraph the following; "and consistent with minimising overall carbon emissions."	Noted, although would "...minimising greenhouse gases" be more suitable given Objective 4?
Questions 2-3	Support		Noted
Question 4	Support	No additional issues.	Noted
Question 5	Support		Noted
Question 6	Support	This a sensible approach to defer selection of preferred locational options until after consultation has been completed.	Noted
Questions 7 -15	Support		Noted
Question 16	Support with conditions	Against what standard will acceptability be judged? The statement is too open ended and could leave the Authority open to challenge. Also the use of "the highest standards" could lead to unnecessary gold plating of projects at prohibitive cost. I suggest "current best practice" would be more appropriate.	Comments noted. The next consultation document will set out the draft policy on protection of the natural and built environment, providing detail as to what would be required by development management officers to determine acceptability.
Question 17	Support		Noted

Question 18	Support	Spatial Option 5 provides the best approach to selection of locations for new waste facilities. It will provide facilities close to the major waste arisings in the county and the hierarchy also provides the flexibility to consider exceptions where appropriate. The other 4 options are restrictive to varying degrees and will inevitably lead to some poor siting decisions.	Comments noted. The decision as to which spatial option will be taken forward for consultation will be made once all of the representations have been considered and the options have been evaluated through a Sustainability Appraisal.
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Representor : 1147 Phillips

Heading	Nature of Response	Response / Representation	Officer comments
Question 4	Observations	With increased pressure on councils to reduce costs the introduction of such schemes needs to be carefully considered to allow for those who do not want to follow the rules. To be clear - any system that will involve costs to producers of waste will be met by resistance and in some cases down right flouting of requirements and fly tipping will be created in greater quantity. Has the council considered this as a by product of any future actions and how they will levy any on going costs and penalties?	Noted but unfortunately there will always be those who wish to operate outside of the law
Question 7	Object	Cannot see how a policy can evolve with such objectives when one of the main resolutions has folded ie Coventry link up. To have a full policy there must be a need to have a proposal that is clear.No sites have been identified, no suggestions made for possible sites and no recommendations should sites be not found as far as I have read so far.	The Warwickshire treatment gap has already been delivered so there is no need to specifically identify new sites but to provide for broad locations and criteria to allow applications to be made where a need is identified

Representor : 1149 Parish Councillor David Collins (Stretton under Fosse Parish Council)

Heading	Nature of Response	Response / Representation	Officer comments
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Questions 1-8	Support		Noted
Question 9	Support with conditions	This is already happening as there is a % reduction in material going to landfill in the Rugby area.	Noted
Question 10	Support		Noted
Question 11	Support		Noted
Question 12	Observations	Should this not be cross-border and undertaken in conjunction with a larger County Council.	Hazardous waste management facilities can be specialist in nature and therefore, due to economies of scale, can serve a sub-regional or regional need. This was acknowledged in the West Midlands Regional Strategy Phase 2 Revision.
Question 13	Support		Noted
Question 14	Support		Noted
Question 15	Observations	I have no expertise in this field.	Noted
Question 16	Support		Noted
Question 17	Support		Noted
Question 18	Observations	A) Preferred Spatial Option : 1 I am not qualified but agree with the listed advantages.	Comments noted. The decision as to which spatial option will be taken forward for consultation will be made once all of the representations have been considered and the options have been evaluated through a Sustainability Appraisal.

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Representor : 1150 Dr David Custance

Heading	Nature of Response	Response / Representation	Officer comments
Questions 1 - 3	Support		Noted
Question 5	Support with conditions	Self sufficiency in waste disposal is particularly relevant. There is no need to exacerbate waste transport by importing/exporting waste to neighbouring counties.	Noted
Question 6	Support with conditions	Wide public consultation is essential before taking decisions on such an environmentally sensitive issue such as waste disposal.	Noted.
Question 7	Support with conditions	There will be a need for sites which can deal with specialised waste disposal. These must have good transport links and be sensitively sited in regard to environmental impact.	Noted, however such wastes will also need to be managed in accordance with the principles of the Waste Hierarchy, i.e. preference to treatment over disposal. The policies in the final Core Strategy will ensure that new sites are well located to strategic transport infrastructure and do not cause an unacceptable impact on the built and natural environment.
Question 8	Support with conditions	In as far as the principle is stated, shortfall of treatment capacity will have to be remedied by provision of additional facilities. However, new planning decisions must take into account waste treatment capacity.	Noted – for example, any extensions to existing sites that provide treatment capacity for municipal and C&I wastes will be factored in to the overall treatment gap calculation
Question 9	Support with conditions	Anything to reduce landfill is to be encouraged. Education of the public and introduction of more selective waste disposal have an important role in achieving this principle.	Agreed. However, such measures would come under the remit of the County's Waste Minimisation Strategy and the Municipal Waste Management Strategy.

Question 10	Support with conditions	Again, reduction of landfill and efficient recycling are to be encouraged - as long as spatial strategy and environmental sensitivity/suitability are fully acceptable.	Noted – the policy framework will specify this.
Question 11	Support with conditions	C and D waste should certainly be treated close to site of origin. Investigation into why Warwickshire imports more C & D waste than is produced in the county should be urgently carried out.	Noted, however it is not possible to prohibit movements of waste across administrative boundaries. The West Midland Regional Spatial Strategy Phase 2 Revision observed that whilst there were flows of C&D and C&I wastes from metropolitan areas to landfills in Shire counties, there was a reverse flow of WEEE, end of life vehicles, paper and hazardous wastes.
Question 12	Support with conditions	The in-county capacity for disposal of hazardous waste should be increased. Given that there may be a shortfall in treatment capacity tight regulation should control the transport of such waste.	The Waste Core Strategy will encourage proposals that seek to treat (i.e. recycle or recover) hazardous wastes. Proposals for the disposal of hazardous waste will need to demonstrate that there is an overriding need for the facility, there would be significant benefits that would result from the development and there would be no significant loss of amenity and that the development is environmentally acceptable.
Question 13	Support with conditions	Again, directing such waste away from landfill is essential and should employ various recycling procedures.	Noted.
Question 14	Support with conditions	Retaining and developing existing waste disposal sites makes economic sense. Non waste development sites will have to take this into account at an early planning stage.	Noted.
Question 15	Support with conditions	Increasing re-cycling and imposing waste treatment will help to prolong period where landfill capacity can cope with demand. The key element of this policy principle is the environment acceptabilities of any proposed new landfill sites.	Any proposals for new landfill sites will need to demonstrate that they accord with all necessary policies, including those on environmental protection. As part of the planning application process, developers would have to demonstrate that the necessary consultation has been undertaken with all required stakeholders e.g. Environment Agency, Environmental

			Health Officers etc.
Question 16	Support with conditions	This is very important and every effort should be made to ensure no slippage of principles taken place!	Noted.
Question 17	Support with conditions	Again this is a vital principle and the council should ensure there are no exceptions to proper enforcement procedures.	Noted.
Question 18	Observations	<p>A) Preferred Spatial Option : 4</p> <p>This ensures new facilities are developed close to high waste arisings. So long as existing waste sites are used, the facilities are already operating and can be expanded. The transport infrastructure is already in place. Care will have to be taken to fully assess the environmental impact of any new sites and as far as possible increase capacity on existing sites.</p> <p>B)</p>	Comments noted. The decision as to which spatial option will be taken forward for consultation will be made once all of the representations have been considered and the options have been evaluated through a Sustainability Appraisal.

Representor : 1151 Mr William McCarthy

Heading	Nature of Response	Response / Representation	Officer comments
Questions 1 - 3	Support		Noted
Question 4	Observations	A policy on decommissioning and site restoration should be adopted as a matter of urgency.	Noted – it is intended that a policy on this will be included in the next consultation document.
Question 5	Support with conditions	This ensures that consideration and use of the waste hierarchy is used while protection of health, and the environment is maximised.	Noted
Question 6	Support with	If the Waste Transfer Station shown on map of page	The Slough waste transfer station is permitted to process

	conditions	13 is for Construction and Demolition Waste. I agree, but it is sited close to Worcestershire boundary and I hope will not be a site for Worcestershire as well!	both C&D and C&I wastes. Whilst the Waste Core Strategy encourages the management of waste in accordance with the principles of proximity and self sufficiency, the strategy is unable to prohibit waste flows into and out of the County
Question 7	Support with conditions	Because the policy stipulates reduction in waste to landfill and aims to site new waste management facilities close to major population centres.	Noted
Question 8	Support with conditions	The treatment gap has been stemmed by future planning permissions, but it must be acknowledged, that with Warwickshire Waste tonnage growing and the coverage (63,000 tonnes) being only 1/10 more future planning permissions will be needed.	Noted. The Annual Monitoring Reports will enable the County Council to examine whether the County Council has met its treatment gap.
Question 9	Support with conditions	Given a yearly increase in waste arisings of 3% it would appear that Warwickshire is on course to meet its 2015 target. I would be happier if government would bring further pressure on manufacturers to reduce packaging, much of it being unnecessary.	Comments noted. Whilst we agree that manufacturer packaging needs stricter controls to reduce the volumes of unnecessary waste, this is outside the remit of the Waste Core Strategy.
Question 10	Support with conditions	I agree but reiterate remarks for question 9 that packaging and planned reuse are strongly urged by central government.	See above
Question 11	Observations	I am not confident from the evidence in the strategy that Warwickshire will be able to cope, without stronger controls on industry.	Noted
Question 12	Support with conditions	This is agreed provided that rigorous measures are taken to ensure a) the minimum amount is imported and b) the maximum amount is treated. Pressure should be brought on government to relax methods of dealing with 'white' asbestos.	Your comments are noted and supported but unfortunately market forces dominate the waste industry. As far as your comment on asbestos is concerned this is agreed but unfortunately the definition is made at the European level where all forms of asbestos are considered to be hazardous and have to be managed in the same way

Question 13	Support with conditions	A close check should be made on medical facilities producing used syringes, gloves etc as well as radio-active waste. Such checks must be included in the policy.	Monitoring of permit compliance is a matter for the Environment Agency
Question 14	Support with conditions	This will ensure future usage which will not be curtailed by other planning permissions.	Noted
Question 15	Support with conditions	Landfilling of quarries and open cast mine areas should cope with required capacity, but there could be future capacity arising due to on-going quarrying in the south.	The principle to restore mineral workings is a good one but they are not necessarily suitable for landfilling. The waste hierarchy does allow landfill to be considered but as a last resort option
Question 16	Support with conditions	I agree that the highest standards of operational practice must be used to ensure local environments are protected.	Noted
Question 17	Support with conditions	Continual monitoring is essential through the Annual Monitoring Reports and other targets and objectives.	Noted
Question 18	Object	<p>A) Preferred Spatial Option: 3</p> <p>1) It is sited on industrial estates, brownfield industrial land or within existing waste management facilities of over 6,000 pop.</p> <p>2) Sites are within reasonable distance of main settlements.</p> <p>3) As such the movement of waste arisings to the sites will produce the minimum disturbance to residents.</p>	Comments noted. The decision as to which spatial option will be taken forward for consultation will be made once all of the representations have been considered and the options have been evaluated through a Sustainability Appraisal.

Representor : 1152 Mr Alan Cook

Heading	Nature of Response	Response / Representation	Officer comments
Question 1	Support	On the whole the county has created an intelligent, logical and legal approach to the problem.	Noted
Question 2	Support with conditions	I would not like to see Nuneaton Area Quarries viewed entirely for landfill/waste recycling. These quarries are of global geological importance. They are also subject to geodiversity and biodiversity action plans (in preparation).	Geodiversity and biodiversity are not always lost when landfilling and can in many instances be enhanced
Question 3	Support		Noted
Question 4	Observations	The local bio & geo diversity action plans are beginning for Nuneaton and Bedworth area. There will be a need for parish BAPS & PIGAPS in some cases. Natural England have identified the need for wildlife corridors to connect habitats.	Comments noted. The policies in the Waste Core Strategy will seek that new waste developments must protect, and where possible enhance the natural and built environment. This will include impacts on biodiversity and geodiversity. Developers will need to demonstrate through an objective assessment that designated features, species and sites are preserved, protected or enhanced.
Question 5	Support with conditions	Nuneaton hard rocks present tempting landfill sites: however the road, rail and canal network are not suitable, either geographically or in engineering design and traffic flow rates.	Proposals for landfilling of waste will not be acceptable unless it is demonstrated that certain circumstances apply e.g. the waste cannot be managed at higher level of the waste hierarchy, there is an overriding need for landfill disposal, there would be significant environmental benefits etc.
Question 6	Support with conditions	Landfill/mineral sites are now subject to carbon footprint assessment. The preparation for and use of a site is now subject to many protocols and specifications.	Noted
Question 7	Object	I do not want North Warwickshire sites being considered for materials import from a large hinterland.	Noted, however it is not possible to prohibit movements of waste across administrative boundaries. The West Midlands Regional Spatial Strategy Phase 2 Revision

			observed that whilst there were flows of C&D and C&I wastes from metropolitan areas to landfills in Shire counties, there was a reverse flow of WEEE, end of life vehicles, paper and hazardous wastes. Where waste is managed can depend on a range of market factors and so any controls are beyond the remit of the Waste Core Strategy.
Question 8	Object	I do not want North Warwickshire quarries and sites developed for land scale landfill/wast processing/soil cleansing. These sites are globally geologically important and are not subject to major geodiversity studies.	Geodiversity and biodiversity are not always lost when landfilling and can in many instances be enhanced
Question 9	Support with conditions	Recycling sites need to be geographically chosen based on many criteria including micro-climate/infrastructure/housing	The spatial options suggested in the consultation document take this into account
Question 10	Support with conditions	Recycling waste materials is critical cutting down on the ludicrous packaging on all commodities.	Comments noted. Encouraging re-use, recycling and recovery will help to reduce the volumes of waste produced through packaging.
Question 11	Support with conditions	Toxic/hazardous waste disposal has serious geotechnical implications. Hard rock quarries are prone to many joints and discontinuities therefore leakage.	Comments noted. PPS10 states that for landfill or land-raising, geological conditions and the behaviour of surface water and groundwater should be assessed both for the site under consideration and the surrounding area. Furthermore, developers would have to demonstrate that the proposal would not cause an unacceptable adverse impact on the natural and built environment, including soil, water etc. This would be demonstrated through the necessary assessments following consultation with consultees such as the Environment Agency, Environmental Health Officers etc.
Question 12	Support with conditions	The low level risk and small quantity with short half-life isotopes are safely manageable.	Radioactive waste is managed by the Environment Agency through the auspices of the Radioactive

			Substances Act.
Question 13	Support	Same as 12)	See above
Question 14	Support with conditions	Best of options available. May need to consider accumulating a 'public fund' to help final remediation ALSF - was fairly good.	Support noted
Question 15	Support	Best of options available.	Noted
Question 16	Support	Best of options available.	Noted
Question 17	Support with conditions	I believe the county will undertake this honourably.	Noted
Question 18	Observations	A) Preferred Spatial Option: 4 Use of brownfield sites is good but should not preclude their usage for housing if the land has been adequately restored. B) 1 has possibilities because precedents have been established and there is a degree of environmental adaptation occurring.	Comments noted. The decision as to which spatial option will be taken forward for consultation will be made once all of the representations have been considered and the options have been evaluated through a Sustainability Appraisal.

Representor : 1153 STUDLEY (Studley Parish Council)

Heading	Nature of Response	Response / Representation	Officer comments
Question	Support		Noted

1 - 3			
Question 4	Observations	A policy on decommissioning and site restoration should be adopted as a matter of urgency.	Noted
Question 5	Support with conditions	This ensures that consideration of and use of the waste hierarchy is used while protection of health and environment is maximised.	Noted
Question 6	Support with conditions	If the waste transfer station shown to the North West of Studley is for Construction & Demolition Waste. We agree but as close to Worcestershire border should not be use by Worcestershire unless charged for the use.	The Slough waste transfer station is permitted to process both C&D and C&I wastes. Whilst the Waste Core Strategy encourages the management of waste in accordance with the principles of proximity and self sufficiency, the strategy is unable to prohibit waste flows into and out of the County
Question 7	Support with conditions	Because the policy stipulates reduction in waste to landfill and aims to site new Waste Management facilities close to major centres.	Noted
Question 8	Support with conditions	The treatment gap has been stemmed by further planning permissions but it must be acknowledged that with Warwickshire Waste tonnage growing and coverage only 1/10 more, further planning permissions will be needed.	Noted. The Annual Monitoring Reports will enable the County Council to examine whether the County Council has met its treatment gap.
Question 9	Support with conditions	Given a yearly increase of 3% it would appear that Warwickshire is on course to meet its 2015 target. The government should bring pressure on manufacturers to reduce packaging much of which is unnecessary.	Comments noted. Whilst we agree that manufacturer packaging needs stricter controls to reduce the volumes of unnecessary waste, this is outside the remit of the Waste Core Strategy.
Question 10	Support	Reiterate remarks for question 9.	As above
Question 11	Observations	Not confident from the evidence in the strategy that Warwickshire will be able to cope without stronger controls on industry.	Noted

Question 12	Support with conditions	Provided that vigorous measures are taken to ensure a) that minimal amounts are imported b) maximum amount is treated c) pressure should be brought on government to relax methods of dealing with 'white asbestos' which is chemically different to 'blue asbestos'.	Your comments are noted and supported but unfortunately market forces dominate the waste industry. As far as your comment on asbestos is concerned this is agreed but unfortunately the definition is made at the European level where all forms of asbestos are considered to be hazardous and have to be managed in the same way
Question 13	Support with conditions	Close check should be made on medical facilities producing used syringes, gloves etc as well as radio active waste. Such checks must be included in the policy.	Noted, however the Environment Agency would be responsible for overseeing the permitting
Question 14	Support with conditions	This will ensure further waste, which will not be curtailed by other planning permissions.	Noted
Question 15	Support with conditions	Land filling of quarries and open-cast mine areas should cope with required capacity, but there could be further capacity arising due to ongoing quarrying in the South.	The principle to restore mineral workings is a good one but they are not necessarily suitable for landfilling. The waste hierarchy does allow landfill to be considered but as a last resort option
Question 16	Support with conditions	Agree that the highest standard of operational practice must be used to ensure local environments are protected.	Noted
Question 17	Support with conditions	Continued monitoring is essential through annual reports and other targets and objectives together with thorough investigation of reports by local residents of any transgressions.	Noted.
Question 18	Observations	A) Preferred Spatial Option: 3 1) It is sited on industrial estate, brownfield industrial land and within existing waste management facilities near settlements of over 6000 people. 2) Sites are within reasonable distance of the main	Comments noted. The decision as to which spatial option will be taken forward for consultation will be made once all of the representations have been considered and the options have been evaluated through a Sustainability Appraisal.

	settlements	
	3) As such the movement of waste arising to the sites will produce the minimum disturbance to residents	

Representor : 1154 Mr Stephen Hill

Heading	Nature of Response	Response / Representation	Officer comments
Question 1	Object	<p>Birmingham International Airport Limited ("the Airport Company") agrees with the vision in terms of minimising the amount of waste sent to landfill.</p> <p>However, the vision needs to go further in making reference to "communicating" with industry, land owners and local communities when looking to deliver additional waste management capacity, it should "consult" with these interested parties and stakeholders i.e:</p> <p>"When looking to deliver additional waste management capacity, consultation with industry, landowners and local communities will be of importance".</p>	Noted and to be changed accordingly.
Question 2	Object	<p>Birmingham Airport is a Strategic National Asset, the region's principal airport and plays a vital role in supporting the regional economy.</p> <p>Birmingham Airport is important in terms of the air links it provides and the role it can play in international connectivity by way of supporting business, commerce</p>	Noted. Warwickshire County Council will undertake any necessary consultation in accordance with The Town and Country Planning (Safeguarding Aerodromes, Technical Sites and Military Explosives Storage Areas) Direction 2002 when formulating any policies or proposals that will form part of the Waste Development Framework. It is intended that a policy

		<p>and industry, stimulating inbound tourism, attracting inward investment, fostering international trade and enhancing cultural and educational links.</p> <p>The Airport Company's interest in the Waste Development Framework and waste management policy is primarily related to Aerodrome Safeguarding (refer to "The Town and Country Planning (Safeguarding Aerodromes, Technical Sites and Military Explosives Storage Areas) Direction 2002"). Aerodrome Safeguarding ensures the safety of aircraft, and their occupants, when in the vicinity of an airport by controlling potentially hazardous development and activity. 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.</p> <p>Aircraft are vulnerable to bird strikes, i.e. collisions with large and flocking birds. Bird strikes are a major hazard and are also costly in terms of damage and delays to aircraft. Airport Operators are required, as set out in the "The Town & Country Planning (Safeguarding Aerodromes, Technical Sites and Military Explosives Storage Areas) Direction 2002", to take necessary steps to ensure that bird strike risk is reduced to the lowest practicable level. The safeguarding area for birds extends some 13km from an airport, as indicated on Figure 3.3 the 'Constraints Map - Waste' on page 18 of the consultation document. Thus, many airport</p>	<p>will be included on aviation safeguarding.</p>
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		<p>operators, like the Airport Company, are statutory consultees on planning applications.</p> <p>Safeguarding of airports should be considered as part of the Waste Development Framework, particularly as the safeguarding zone for airports will affect many of the spatial options available for the strategy.</p> <p>The key objectives in the Waste Development Framework should therefore incorporate an additional objective relating to Aerodrome Safeguarding.</p> <p>Suggested inclusion:</p> <p>"To have regard to the Aerodrome Safeguarding requirements of an airport within 13km of any proposals for new or extended waste management facilities".</p> <p>Alternatively, the existing objective "To have regard for the concerns and interests of local communities" could be amended as follows:</p> <p>"To have regard for the concerns and interests of local communities and businesses, including airports in terms of Aerodrome Safeguarding".</p>	
Question 3	Support		Noted
Question 4	Observations	<p>Yes, Aerodrome Safeguarding is a key issue that should be considered as part of the Waste Development Framework.</p> <p>As mentioned above, Aerodrome Safeguarding ensures</p>	<p>Noted. In the next consultation document, there will be a policy that states that planning permission will not be granted for waste management proposals where it would cause an unacceptable hazard to aviation. This will be established following the</p>

		<p>the safety of aircraft, and their occupants, when in the vicinity of an airport by controlling potentially hazardous development and activity. 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.</p> <p>Aircraft are vulnerable to bird strikes, i.e. collisions with large and flocking birds. Bird strikes are a major hazard and are also costly in terms of damage and delays to aircraft. Airport operators are required, as set out in the "The Town and Country Planning (Safeguarding Aerodromes, Technical Sites and Military Explosives Storage Areas) Direction 2002", to take necessary steps to ensure that bird strike risk is reduced to the lowest practicable level. The safeguarding area for birds extends some 13km from an airport, as indicated on Figure 3.3 the Constraints Map - Waste' on page 18 of the consultation document.</p> <p>There is also a potential hazard presented by certain waste site restoration methods. For example, water based restoration/land uses may potentially increase bird activity in the vicinity of an airport, due to the likely bird attractant features associated with landscaping and open water.</p> <p>Such issues form an important element of safeguarding an airport and should be considered as part of the Waste Development Framework, particularly as the</p>	<p>necessary consultation under The Town and Country Planning (Safeguarding Aerodromes, Technical Sites and Military Explosives Storage Areas) Direction 2002.</p>
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		<p>safeguarding zone for airports will affect many of the spatial options available for the strategy.</p> <p>The figures and plans contained within the document, particularly Figure 3.1 and Figure 3.3, should annotate the location of airports and label them appropriately. Birmingham Airport, for example, should be highlighted and labelled, particularly as it has a 13km constraint to the location of waste management sites, as indicated above.</p>	
7 Development of Policy Principles	Other	No comment.	Noted
Question 6 - 14	Other	No comment.	Noted
Question 15	Support with conditions	<p>Landfill must be seen as the last resort for waste disposal. The Policy Principle should go further than requiring such sites to be environmentally acceptable. They should also be operational acceptable, particularly in terms of reducing aviation risks, such as bird strike.</p>	<p>Noted. In the next consultation document, there will be a policy that states that planning permission will not be granted for waste management proposals where it would cause an unacceptable hazard to aviation.</p>
Question 16	Other	No comment.	Noted
Question 17	Other	No comment.	Noted
Question 18	Observations	<p>A) Preferred Option: The Airport has no specific preference for a particular spatial option, but would refer to the comments made below.</p> <p>Any Spatial Option should take account of the Aerodrome Safeguarding requirements of airports.</p> <p>Aerodrome Safeguarding ensures the safety of aircraft, and their occupants, when in the vicinity of an airport by</p>	<p>Noted. In the next consultation document, there will be a policy that states that planning permission will not be granted for waste management proposals where it would cause an unacceptable hazard to aviation.</p>

		<p>controlling potentially hazardous development and activity. 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.</p> <p>Aircraft are vulnerable to bird strikes, i.e. collisions with large and flocking birds. Bird Strikes are a major hazard and are also costly in terms of damage and delays to aircraft. Airport Operators are required, as set out in the "The Town and Country Planning (Safeguarding Aerodromes, Technical Sites and Military Explosives Storage Areas) Direction 2002", to take necessary steps to ensure that bird strike risk is reduced to the lowest practicable level. The safeguarding area for birds extends some 13km from an airport, as indicated on Figure 3.3 the 'Constraints Map - Waste' on page 18 of the consultation document.</p> <p>Such issues form an important element of safeguarding an airport and should be considered as part of the Waste Development Framework, particularly as the safeguarding zone for airports will affect many of the spatial options available for the strategy.</p> <p>In terms of Birmingham Airport, any new or extended sites proposed within 13km of the Airport, will need to be very carefully considered. If any new or extended site increases the bird strike risk to operations at the Airport, the Airport Company, as a statutory consultee, would</p>	
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		<p>object to such a scheme. For example, any new waste management sites at Coleshill will need careful consideration, given its proximity to Birmingham Airport.</p> <p>B) No comment.</p>	
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Representor : 1155 Mr Howard Darling (Corley Parish Council)

Heading	Nature of Response	Summary of Response	Response / Representation	Officer comments
1 Introduction	Observations	Overall a very disappointing report with little to promote its aims and objectives.	<p>I just wonder how much this document cost to produce because it says VERY little!!! The glossy nature of the publication must have added to the cost - just a pity the pages could not even be in the right order.</p> <p>Whist I have no issue with the principle of recycling and reducing landfill use there is no mention of the cost v benefit of this. I live in a rural area and can't imagine that the CO2 involved in collecting our green/red waste in any way is saved by what is recycled. There is nothing in the document about educating people in what you are trying to achieve - all the policy initiatives in the world will be to no avail unless you take the general public with you.</p>	Noted

Representor : 1156 Mr Keith Kondakor (Nuneaton Friends of the Earth)

Heading	Nature of Response	Response / Representation	Officer comments
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4 Waste Management Context	Object	<p>You have ignored the fall in total waste since 2004/5. The RSS projections are clearly way off.</p> <p>The projections need adjusting to take account of the real amount of MSW and C&I waste produce in 2010/11. The growth rate needs replacing with a range of possible future "growth rates" based on the last 5 years change in MSW and C&I.</p> <p>It is important to use consistent frame of reference, so for example if you use waste per household you need to apply growth in households and the trend in falling waste per household.</p> <p>You also need to take account of DEFRA's C&I reports that show a massive drop in C&I since 2003.</p> <p>It would also be useful to take data from EA and landfill tax to show how big a drop in total disposal has happened</p>	<p>We agree that the observed municipal waste arisings in recent Annual Monitoring Reports are lower than the predicted MSW arisings projection figures in the WMRSS Phase 2 Revision. However, the "credit crunch" may have resulted in less municipal waste and this needs to be taken sufficiently into account. We will review the latest information to hand and if necessary will revise the projections accordingly. Any revised figures will be open to comment during the next consultation stage.</p>
Question 1	Object	<p>you need to change it to focus on reducing landfill and incineration. You also must think about the public. You need to think of health and happiness!</p> <p>so:-</p> <p>By the during of the plan period, the amount of waste generated and sent to landfill or incineration will be minimised, by increasing recycling and composting and ensuring that sustainable waste management practices are delivered in accordance with the priorities identified in the waste hierarchy.</p>	<p>Compliance with the principles of the waste hierarchy within the core strategy will ensure that your objectives are met.</p>

		<p>When looking to deliver additional waste management capacity, communication with local communities, industry and landowners will be of importance. There will be a wide range of facilities which are able to serve the key settlements within Warwickshire as well as the rural areas.</p> <p>All appropriate measures will be taken to protect and conserve the rural characteristics of Warwickshire as well as safeguard existing communities and human health. The plan will seek opportunities to develop good health, happiness and opportunities for the population of Warwickshire.</p>	
Question 2	Object	<p>we need reduce all disposal.</p> <p>change</p> <p>"by looking to landfill disposal as a last option, but one that must be adequately catered for."</p> <p>to</p> <p>"by looking to landfill disposal and incineration as a last options, that should be phased out but may not be fully eliminated.</p>	Agree with your suggested re-wording
Question 3	Object	<p>6.3 We do not need self-sufficiency for each waste stream and key waste facilities exist in Coventry and within 2 miles of the county boarder that should not be ignored. The county does not need to be self-sufficient but needs to deal with its fare share of the waste stream</p>	<p>In the first instance Warwickshire will aim to be self sufficient and at the very least will attempt to manage an equivalent amount of waste to that which it generates which in itself takes account that it will use sites outside of its administrative boundary</p>

Question 3	Object	<p>6.4 the county does not need to provide sufficient treatment capacity to meet or exceed the landfill diversion targets for municipal waste set out in the Regional Spatial Strategy. The RSS was wrong and far less MSW has been produced. There is also a massive excess of incineration capacity in Coventry and the region that cannot be ignored. The region is only landfilling 27% of its MSW as of 2010/11 Q2. An additional 300,000 tonnes of incineration capacity is under construction and 290,000 of capacity is subject to public inquiry. The region can reduce its landfilling to 10% purely by increasing recycling by 17 percentage points.</p> <p>Providing excess waste disposal and incineration capacity will lead to a pressure to reduce recycling and import waste from other regions.</p>	Comments noted
Question 3	Object	<p>6.5 The Core Strategy will NOT need to provide sufficient treatment capacity to meet or exceed the landfill diversion targets for C&I waste set out in the Regional Spatial Strategy</p> <p>There is possibly only half the amount of C&I being disposed of as expected by the RSS. The gate fees for MRFs are near zero. The core strategy should take note of an excess of planned incineration capacity in Staffordshire which is viewed as regional facilities. The core Strategy should only provide sufficient additional treatment capacity to meet real treatment gaps.</p>	Comments noted
Question 3	Object	6.8 remove the line	Warwickshire would not wish to discount the use of incineration or thermal treatment as it would want to

		<p>"Any future waste strategy could not discount the use of incineration and thermal treatment as this would be outside Government and EU law".</p> <p>WCC core strategy is not the place to make such a statement.</p> <p>Some other councils do have policy against mass-burn incineration. The Core strategy should have a policy against incinerators that do not meet the R1 standard to count as recovery at both the maximum and minimum operational tonnage.</p>	<p>ensure a holistic approach to the management of waste within its administrative boundary</p>
Question 3	Object	<p>6.10 add</p> <p>large waste facilities should be flexible for example being modular or operating in batch modes so that they can adapt to changes in waste arsinnes.</p>	<p>6.10 already allows for flexible facilities scaled appropriately so see no need to amend as suggested</p>
Question 3	Object	<p>6.13 Any regional facility should be site near a rail head were possible</p>	<p>6.13 already refers to sustainable transport solutions which would include rail</p>
Question 7	Object	<p>Rail heads such as rail linked industrail estates, ex-mining sites and rail yards could be included for transfer stations and larger MFS.</p>	<p>Comments noted</p>
Question 9	Object	<p>Warwickshire is already setting a new target for 60% recycling well ahead of 2020. It is important to aim tragets at reducing residual waste not just by recycling but also reduction, repair. reuse, etc. The county needs to aim to halve resiudal waste and then aim to halve it again.</p>	<p>Comments noted</p>
Question 10	Object	<p>should aim to reduce landfill and incineration of C&I waste. Should have a strong zero waste aim. The</p>	<p>Agreed that "Zero Waste" is an admirable aim but perhaps a more realistic aim in accord with Government</p>

		county should aim for the near elimination of residual C&I waste.	Policy would be to aim for “Zero Waste to Landfill”
Question 12	Object	A Policy Principle is required that encourages the elimination of hazardous waste where possible. It should strongly discourage any process that produces haz waste	Will amend the Policy Principle to include “the elimination of hazardous waste where possible” but not to exclude the reference to “treatment”
Question 13	Object	We should have a policy of zero radioactive waste wherever possible. No waste treatment or disposal process in the county should allow radioactive substances to escape into the wider environment. The incineration of any radioactive waste should be prohibited in the county.	Zero radioactive waste is an admirable aim but unfortunately some medical diagnostics require its use and some contamination will occur
Question 15	Object	your data is misleading. far less than 50% of MSW is landfilled and less than 40% of C&I. The majority of waste landfilled in Warwickshire comes from outside the county. The sharp increase in landfill tax has reduced non-inert landfilling by around 50% over the last 6 year.	The data used to inform the core strategy remains under review and your comments are noted
Question 16	Object	The statement also needs to add something about a suitable gap between some waste facilities and homes, schools etc.	Although not explicit in the statement operating to the highest environmental standards would in itself protect homes, schools etc
Question 17	Object	The AMRs are not being used to adjust the demand forecast for waste treatment require. If you only monitor supply but not demand then you get the size of the gap wrong. The policy should use the AMR to update waste arisings forecasts in order to correctly monitor any treatment gaps	Comments noted and will look at how future AMRs can better reflect the issue that you raise
Question 18	Object	Spatial Option 5 seems to have the most merit but we need some gap between housing and some waste plants, We should also not ignore sites in very close to	Comments noted. The decision as to which spatial option will be taken forward for consultation will be made once all of the representations have been

		the boarder that may be more suitable.	considered and the options have been evaluated through a Sustainability Appraisal.
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Representor : 1158 Mrs Jane Sands (Ansley Parish Council)

Agent : 1157 Mrs Jane Sands (Ansley Parish Council)

Heading	Nature of Response	Response / Representation	Officer comments
Questions 1 - 3	Support		Noted
Question 4	Other	Not that we can think of	Noted
Question 5	Observations	yes - it makes sense to manage waste close to where it is generated and we are happy with cross boundary flows as long as we don't have to take in more than our fair share	Noted
Question 6	Observations	yes - location to take account of consultation responses.	Noted
Question 7	Support	i) Yes ii) Sounds reasonable iii) No	Noted
Question 8	Support	yes - we need to have contingency plans	Noted
Question 9	Support	agree - but need to educate people much more to stress the importance of recycling. Also, put more communal recycling containers in lay- byes etc for clothes, shoes, and household furnishings etc.	Noted, however these measures would come under the remit of the Municipal Waste Management Strategy rather than the Waste Core Strategy.

Question 10	Object	Although we appreciate the principle that less C & I and C & D waste should go into landfill in the future we have concerns about what effect this may have. We would not want to see contractors dumping all sorts of fly tipping around the countryside in an attempt to get rid of it if they cannot use proper channels. Even with the present targets, we do have a lot of concrete, soil and tyres dumped and we feel that adequate provision for the disposal of industrial materials should be made.	Comments noted. The Waste Core Strategy will seek to ensure that there is an equivalent capacity available to manage the amount of C&I and C&D waste that will arise in the County. Site Waste Management Plans for C&D wastes are now a mandatory requirement for any developments valued at over £300,000 and this should prevent any illegal tipping of such wastes.
Question 11	Object	same response as in section 10	As above
Question 12	Object	Disagree- we already import 51,000 tonnes of hazardous waste yet only 18,905 tonnes of our own is exported (out of a total of 38,309 tonnes). We understand that it is give and take but we do not want North Warwickshire to be the dumping ground for everyone else's contaminated waste from the south of the county.	If we want to avail ourselves of facilities beyond the county boundary then we have to accept some reverse movement. It is just unfortunate that some of this is deemed hazardous waste which is landfilled in appropriately engineered landfill cells as solidified non reactive hazardous waste
Question 13	Support	yes - but sites need to be carefully chosen and should be well away from residential areas where it might affect peoples health.	Noted. The Core Strategy will provide the necessary policies to safeguard health.
Question 14	Support	yes definately - if people have already got used to the idea of a waste facility on their doorsteps we might as well keep it going rather than starting again with public outcry elsewhere.	Noted, however the safeguarding of sites is primarily a mechanism that allows the County Council to object to proposals for non waste development that may prevent or unreasonably restrict
Question 15	Object	Similar response to question 12. There must be some suitable sites in the south of the county to accommodate their waste in the long term, especially in view of the mission statement to deal with waste close to where it is generated. It is not fair to say that in the future the concentration of the entire county's landfill capacity may	Self sufficiency and proximity will deal with this

		lie in the North (7.19)	
Question 17	Support	yes - if it works. We have to say that our own experience of the control and enforcement of planning conditions at present does not fill us with confidence that this statement will be achievable.	Noted
Option 5	Support	We feel this option offers the most flexibility.	Noted
Question 18	Observations	Alternative 5 is the preferred option for us as we feel it offers the most flexibility.	Comments noted. The decision as to which spatial option will be taken forward for consultation will be made once all of the representations have been considered and the options have been evaluated through a Sustainability Appraisal.

Representor : 1159 Mr K Orchard

Heading	Nature of Response	Response / Representation	Officer comments
Questions 1 - 3	Support		Noted
Question 4	Observations	Industrial waste going to atmosphere should be considered.	Dealt with through environmental permitting regime administered by the Environment Agency
Question 5	Support with conditions	A sound view, it is currently about 15 miles round trip to the nearest waste tip.	Noted
Question 6	Support with conditions	Should result in less travel to the local waste disposal site.	Noted
Question 7	Support		Noted
Question 8	Support with conditions	This approach will be needed.	Noted
Question 9	Object	Much has been done to reduce waste to	Aggressive targets that might not be achievable are unhelpful.

		landfill. However whilst the plan exceeding targets I feel that an even more aggressive targets should be set, particularly for household waste.	Targets for Municipal (Household) are set in the landfill directive and are subject to review
Question 10	Support		Noted
Question 11	Support		Noted
Question 12	Observations	Don't agree with Warwickshire getting involved with hazard waste treatment that it does not currently handle.	There is no intention for Warwickshire to get involved in hazardous waste treatment but there needs to be provision in the core strategy that will allow for an informed judgement on any application for planning permission that might transpire which fits within the principles of self sufficiency and proximity
Questions 13 - 15	Support		Noted
Question 16	Support with conditions	This policy must include the input of people who are effected.	Already covered as people are part of the natural and built environments
Question 17	Support with conditions	This is essential.	Noted
Question 18	Observations	A) Preferred Spatial Option: 5 Facilities will be located in the areas of greatest waste arising. This will shorten journey to the waste site. Also make the problem more visible, which will help with reduction targets. B)	Comments noted. The decision as to which spatial option will be taken forward for consultation will be made once all of the representations have been considered and the options have been evaluated through a Sustainability Appraisal.

Representor : 1160 Mr Phil Larter (Leicestershire County Council)

Heading	Nature of Response	Response / Representation	Officer comments
Question 1	Support		Noted
Question 2	Object	Objective 2 would be more useful if it stated what the 'identified need' was. If this is unclear due to data issues to at least state that you were meeting the levels of waste deemed to arise in Warks would be clearer, i.e not seeking to be a net exporter/importer of waste. (I appreciate that this is set out in your 'key issues').	Noted and to be amended
Question 3	Object	6.5 - should it be 'near to where C&I arises' rather than 'municipal'?	Noted and to be amended
Question 5	Support with conditions	This accords with the approach taken by Leicestershire and Leicester City and would ensure Warks takes responsibility for the waste it produces and accepting movement over administrative boundaries.	Noted
Question 6	Support		Noted
Question 7	Support with conditions	Third bullet point - just 'close' or 'close or within'?	Will amend bullet point 3 to say "within or close to"
Question 8	Support with conditions	May be worth stating that the AMR would assist in identifying the treatment gap year-on-year.	Noted and to be amended accordingly.
Questions 9 - 11	Support		Noted
Question 12	Support with conditions	Should the treatment of hazardous waste also be given a 'spatial' element i.e located in proximity to arisings/urban areas?	Agreed
Question 13	Other		?
Question 14	Support with conditions	Agree with the principle but unclear how this would be achieved. It appears Warks is considering a 'buffer zone' around such sites.	A buffer zone may overcome some of the issues raised by those who do not want

			development in their backyards
Question 15	Support		Noted
Question 16	Support		Noted
Question 17	Support	(see answer to Qu. 8)	Noted
Question 18	Observations	<p>A) Preferred Spatial Option: 5</p> <p>Seems to strike the right balance between directing new developments to where waste is arising i.e. the urban areas, but allowing smaller settlements to have new sites, where appropriate. I do wonder whether in bullet points ii and iii any sized site is acceptable in these locales, i.e would you want a 100,000 tpa EFW in a 'secondary' settlement? The only 'issue' is with bullet point iii which seems to give any existing waste management facility an acceptability but such a site may be very poorly located and the policy could be construed as advocating the perpetuation/expansion of the poorly located site.</p>	<p>Comments noted. The decision as to which spatial option will be taken forward for consultation will be made once all of the representations have been considered and the options have been evaluated through a Sustainability Appraisal.</p>

Representor : 1161 Cllr E. J Shattock

Heading	Nature of Response	Response / Representation	Officer comments
Question	Support		Noted

1			
Question 2	Support		Noted
Question 3	Support with conditions	Restoration and site decommissioning is imperative particularly for those sites adjacent to villages and clusters of homes.	Site closure plans are required as part of the environmental legislation administered by the Environment Agency
Question 4	Observations	Consideration should be given to those communities, of which Bubbenhall is one, that have had waste management facilities for upwards of 25 years. It is important that these sites should not operate for longer than the original planning consent provided.	Noted but clearly completion to the planned landform is essential as this has been so designed to prevent future environmental issues
Question 5	Support with conditions	It will be important to reduce still further the percentage of waste sent to landfill while also implementing self sufficiency for waste management within the county.	Agreed
Question 6	Support with conditions	Waste development should take place close to urban centres with good transport links.	Agreed
Question 7	Support with conditions	I agree that strategic sites could have more than a local function provided these are shared across the region. The county is too small to justify its becoming a net importer of waste.	Noted
Question 8	Observations	It would seem that Warwickshire is already granted sufficient planning permissions to more than meet the treatment gap (p34)	Yes and supports the view that it is unlikely that a sites allocation document will be required
Question 9	Support with conditions	Yes, it is essential that the county further encourages and enables recycling and reuse of waste materials.	Agreed
Question 10	Support with conditions	See answer to question 9.	As above
Question 11	Support with conditions	Monitoring of construction and demolition sites is imperative and therefore further regulation is required.	Site Waste Management plans addresses this issue
Question	Support with	It is clear that most hazardous waste will be treated outside the county.	Facilities already exist outside of the County

12	conditions		to treat hazardous wastes
Question 13	Other	Only if it does not require additional treatment capacity.	Noted
Question 14	Other	It is not clear what is meant by non-waste developments - I do not feel that existing sites should be safeguarded when they have had an adverse impact on a community. See answer to Q4.	A buffer zone may overcome some of the issues raised by those who do not want development in their backyards
Question 15	Object	It should be the policy, as targets for landfill are to be reduced that existing landfill capacity is regarded as sufficient and no new sites developed.	Clearly landfill remains the last resort option but not to have a landfill bank would not be helpful
Question 16	Support		Noted
Question 17	Support		Noted
Question 18	Observations	A) All 5 options can be seen or interpreted as maintaining some existing sites. The priorities for sites should be 1) environmental and then 2) proximity to areas of largest use. Development of Brownfield and industrial sites should also be prioritised. Sites which have been developed from sand and gravel extraction and which are in rural areas away from centres of population should not have their period of use extended. It is unfair to those communities.	Noted but the options have been developed with the issues that you have raised informing their development

Representor : 1162 Allison Crofts (Natural England)

Heading	Nature of Response	Response / Representation	Officer comments
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Question 1	Observations	<p>The vision should put the focus on the benefits of a high quality natural environment in supporting economic growth, investment and social well being through reduction of waste and the sustainable location of Warwickshire's waste sites.</p> <p>Natural England strongly believes that the natural environment provides the context for any form of spatial vision. Natural England believes that the spatial vision text as it stands should be more aspirational with respect to protecting Warwickshire's natural environment. The last paragraph should be re-worded to state 'All appropriate measures will be taken to protect and conserve the rural characteristic, natural and historic environment of Warwickshire as well as safeguarding.....' etc.</p>	Your comments are noted and the vision statement will be re-worded to take account of your revised wording
Question 2	Support	Natural England supports the objectives as set out, especially references to enhancing the natural environment, minimising waste in future development and reducing emissions of green house gases.	Noted
Question 4	Observations	<p>Thank you for consulting Natural England on the above. Your letter was received on 23/03/11.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England supports the rescinded West Midlands RSS Waste Policies 1,5, 6 and 7. Our main concern is that waste should be located in the most appropriate place where any proposal would be within the environmental capacity of the area and that appropriate environmental safeguards and restoration objectives are applied in order to ensure Warwickshire's environmental, social and cultural assets are not compromised.</p>	Your advice is acknowledged

Generally speaking, Natural England supports the principles behind the emerging Spatial Options which, overall, move waste management towards increased sustainability. However, in order for decisions about preferred spatial options to be classed as 'sound' under PPS12 (Paragraph 4.37), it is essential that they are based on thorough and up-to-date evidence, including environmental evidence.

Neither the draft document nor the Council's website explains how the evidence base regarding the natural environment (other than strategic flood risk) has been/will be prepared to inform the Spatial Options document. The Warwickshire County Council Habitat Biodiversity Audit should be used as a critical source of environmental information to underpin the waste strategy. We strongly advise that the Council ensures that the necessary survey work is undertaken at the next available survey season to ensure that the most up to date habitat data underpins the waste strategy preferred options consultation. Species, geological and historic landscape data should also be screened from existing Local Record Centre data to complement the habitat data.

This information is critical when comparing the environmental impact of the proposed spatial options and should feed into the Sustainability Appraisal process.

We recommend that the GIS boundaries of the SSSIs be replaced with a symbol to make their locations more obvious as the map is quite confusing and unclear at present.

Natural England supports the inclusion of 'Protection of Environmental Resources' but would prefer to see stronger worded protection for non-statutory sites. The phrase 'due regard' for non-statutory sites should be replaced by 'protection of non-statutory sites'. We would also prefer to see the opportunities for 'enhancement' of biodiversity incorporated into

		paragraph 6.12 alongside the avoidance of impacts.	
Question 16	Observations	We would prefer to see a far more inspirational policy set out here ie in addition to no unacceptable adverse impacts on the natural or built environment, that waste developments will make a positive contribution to enhancement of the natural environment. Furthermore we strongly recommend that the word 'landscape' should be inserted into this paragraph as it requires specific mention as a key consideration in any policy on environmental considerations.	The words “positive contribution” can be added here. “Landscape” can also be added to enhance this policy principle and to reflect Natural England’s representation
Question 17	Observations	The policy should include appropriate environmental indicators for the natural environment.	The monitoring of environmental indicators can be added to the preamble to this Policy Principle
Question 18	Observations	<p>Until further work is presented on the environmental evidence base in order to underpin the Sustainability Appraisal and preferred options stage, Natural England will not comment in detail at this stage on the specific emerging Spatial Options rather than to restate our main concern is that waste should be located in the most appropriate place where any proposal would be within the environmental capacity of the area and that all waste developments should make a positive contribution to enhancement of the natural environment.</p> <p>The Sustainability Appraisal and Habitat Regulations Assessment</p> <p>Further work should be undertaken by Warwickshire's Habitat Biodiversity Audit as discussed in our introductory comments in order to provide natural environmental evidence to underpin the SA and preferred spatial options stage. The SA should incorporate some explanatory and interpretative text as well as the existing matrices.</p> <p>Natural England notes that impacts on European nature conservation sites cannot entirely be ruled out at this stage and support the proposal to include further screening work as the emerging options develop,.</p>	These comments are noted

Representor : 199 Mr Maurice Barlow (Solihull Metropolitan Borough Council)

Heading	Nature of Response	Response / Representation	Officer comments
Question 4	Observations	<p>The consultation on emerging spatial options is noted. Whilst there are no specific comments on the spatial options, I would like to draw your attention to the sub-regional links that exist in the management of waste within Coventry, Solihull and Warwickshire.</p> <p>You will be aware of the joint working that has taken place in relation to recovery of energy from waste via the facility in Coventry and proposals for its enhancement. Whilst Project Transform is no longer relevant, it is likely that our authorities will wish to continue working together on relevant waste management issues.</p> <p>In addition, Solihull MBC has a contract to dispose of residual municipal waste at Packington Landfill site just over our boundary in Warwickshire, which should be factored in to any calculations relating to landfill requirements, as well as one relating to the composting facility at the same site. Whilst Packington may not be available for the length of the plan period, it is not yet clear where residual waste from Solihull will go beyond its lifespan.</p> <p>Although the aim in waste management terms is for self-sufficiency, this is unlikely to be easier to achieve at regional or sub-regional levels than for individual authorities. Packington is also very close to Solihull and the main waste transfer station for the Borough which means that disposal</p>	<p>Whilst the reliance of the conurbation on Packington for the disposal of its residual waste is understood it is unlikely that additional landfill capacity will be provided to replace this when it is lost as there is already sufficient landfill capacity within Warwickshire to accommodate its residual waste requirements</p>

		there is sustainable in transport terms. I trust that you will take the above into account in developing your waste core strategy.	
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Representor : 1164 Mr Bob Sharples (Sport England)

Heading	Nature of Response	Response / Representation	Officer comments
Question 1	Support		Noted
Question 2	Support		Noted
Question 3	Support with conditions	Any restoration project should include some form of ongoing maintenance programme for at least 20 years.	Aftercare covered by planning conditions
Question 3	Support		Noted
Question 4	Observations	Any site which is to be decommissioned should be done so as to have a future use which benefit to the local community which it is based.	Noted
Questions 4 - 17	Support		Noted

Representor : 122 Mr Malcolm Watt (Cotswolds conservation Board)

Heading	Nature of	Response / Representation	Officer comments
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	Response		
Policy Context	Observations	The Policy context should include the Cotswolds AONB Management Plan 2008-13. This statutory plan has been endorsed by the County Council as a material consideration for planning policy development.	Noted
Question 1	Support		Noted
Question 2	Other		Noted
Question 5	Support		Noted
Question 16	Support	The policy is in accordance with the requirements of the Countryside and Rights of Way Act 2000 and Planning Policy Statement 7 with respect to designated landscapes.	Noted
Question 18	Support	The Cotswolds Conservation Board supports this spatial option.	Unsure of which spatial option is referred to?

Representor : 1166 BEAUDESERT & HENLEY (Beaudesert & Henley in Arden Parish Council)

Heading	Nature of Response	Response / Representation	Officer comments
Question 1-17	Support		Noted
Question 18	Observations	A) Preferred Spatial Option: Two The infrastructure is already in place.	Comments noted. The decision as to which spatial option will be taken forward for consultation will be made once all of the representations have been considered and the options have been evaluated through a Sustainability Appraisal.

Representor : 1167 Mr Nick Hillard (University of Warwick)

Heading	Nature of Response	Response / Representation	Officer comments
Question 1	Observations	The statement is generally comprehensive. consideration could be given to the addition of reuse and renewable energy generation from (for example) anaerobic digestion, alongside the existing recycling and composting references. The term "facilities" could be expanded to "waste handling/reduction facilities" to eliminate the potential assumption on waste disposal.	Noted
Question 2	Observations	Consider making reference to "climate change adapted facilities"	Noted
Question 6	Observations	There needs to be a focus on reprocessing and bulking up of materials rather than disposal.	Noted
Question 12	Observations	Generally agree, but options with respect to potential hazardous waste treatment facility should be kept open.	Noted
Question 16	Observations	Generally agree, but efforts to reduce environmental impact should not be restricted to "developments". Options to reduce impact of existing waste management facilities should also be included.	Noted
Option 1	Support	Provides the greatest flexibility to provide a variety of treatment facilities of varying sizes to accommodate local requirements.	Noted
1 Glossary	Observations	Treatment facility is not defined in the glossary. Windrow composting is not defined (despite being referred to in "composting".	Will add these terms to the glossary

Representor : 1168 Mr James Hollyman (Harris Lamb Ltd)

Heading	Nature of Response	Response / Representation	Officer comments
Question 1	Object	The vision statement should provide a clearer commitment by the council that it will ensure the provision of additional waste recycling facilities.	The vision makes reference to recycling and delivering waste management practices in accordance with the priorities of the waste

			hierarchy
Question 2	Object	See overleaf.	
Question 5	Support with conditions	<p>We agree that for reasons of sustainable development, the county should aim to recycle an amount of waste equal to that produced in the county.</p> <p>Question 2 -</p> <p>The use of existing developed sites in the Green Belt should not be deemed inappropriate. The continued use of such sites for either their original purpose or an alternative use makes little difference to urban expansion. Indeed, existing industrial and waste facility sites in the Green Belt may be eminently suitable locations for waste management facilities. These sites often benefit from excellent rail and road connections and few neighbours and consequent amenity problems.</p>	Any extension to waste management activities at sites within the green belt would, like any other, need to demonstrate the exceptional circumstances in support of the proposal
Question 7	Object	The definition of 'strategic' sites should also include current waste recycling sites. These sites should be protected for such use and their use maximised.	Noted
Question 8	Support with conditions	But see above comments regarding green belt.	See response to Q5 above
Question 9	Support	See 8)	See response to Q5 above
Question 10	Support	See 8)	See response to Q5 above
Question 11	Observations	We agree that construction waste should be recycled close to source but do not see why reference is made to urban centres.	Recycling close to Urban Centres will reduce transportation requirements and hence be more sustainable

Question 13	Support		Noted
Question 14	Support with conditions	It is crucial that if an existing waste recycling use is displaced, an alternative site is proposed.	Agreed but will be dictated by market forces
Question 15	Support		Noted
Question 16	Support with conditions	However, the requirements of any waste recycling operation must be appropriate to the nature of the operation and the nature of the waste involved.	Agreed
Question 17	Support		Noted
Question 18	Observations	<p>A) Preferred Spatial Option: 1</p> <p>This option provides maximum flexibility in terms of possible sites and does not limit the use of existing facilities particularly those in sustainable locations.</p> <p>Sites between conurbations with good transport linkages are able to serve both catchments and may be more efficient than facilities than located in all single urban area/town, particularly if such a facility is small in scale.</p>	Comments noted. The decision as to which spatial option will be taken forward for consultation will be made once all of the representations have been considered and the options have been evaluated through a Sustainability Appraisal.

Representor : 1165 Mr. Clive Dorney (Jaguar Land Rover)

Heading	Nature of Response	Response / Representation	Officer comments
Questions 1 - 2	Support		Noted
Question 3	Support	Strong support for self-sufficiency	Noted

		principle	
Question 4	Observations	No new issues to propose	Noted
Question 5	Support	Reduced transportation impacts	Noted
Question 6 - 7	Support		Noted
Question 8	Support	Urge 'pre-treatment' to be included in the definition for closing the treatment gap	Will show in the glossary definition for treatment that it includes pre-treatment
Question 9	Other	N/A to C&I waste producers	Agreed
Questions 10 - 17	Support		Noted
Question 16	Support	Strong links to Jaguar Land Rover's support of local environment and habitats	Noted
Question 17	Support		Noted
Question 18	Support	Support for option 5, as it provides maximum flexibility to reach the right solutions	Comments noted. The decision as to which spatial option will be taken forward for consultation will be made once all of the representations have been considered and the options have been evaluated through a Sustainability Appraisal.

Representor : 1170 Mr John Waite (Copston Magna Parish Council)

Heading	Nature of Response	Response / Representation	Officer comments
Question 1	Support		Noted
Question	Support		Noted

2			
Question 3	Support with conditions	But also incorporate the link between waste disposal and the potential to create "Green" energy and reduced CO2 emissions by developing anaerobic digestion plants.	Noted – these links will be strengthened in the next iteration of the plan. The Core Strategy promotes waste management in accordance with the principles of the Waste Hierarchy. As anaerobic digestion is at a higher level of the waste hierarchy, the principle of the technology is supported.
Question 4	Observations	As above ie waste used for anaerobic digestion power generation and fertiliser production.	See response to Q3 above
Question 5	Support		Noted
Question 6	Support		Noted
Question 7	Observations	Why do they need to provide more than a local function?	Because of their nature it is likely that they would serve a wider catchment
Question 8 - 12	Support		Noted
Question 13	Support with conditions	Re: Agric-waste and sewage slurry see comments on anaerobic digestion.	It is recognised that there is the potential to anaerobically treat food waste jointly with agricultural slurries and sewage sludge
Question 14	Observations	This should depend upon the specific type of waste site e.g. if a sites type/technology becomes obsolete there should be a planned re-instatement to acceptable alternative.	Noted
Question 15	Object	There should be a more positive stance against landfill and the "get out" final sentence deleted.	Unfortunately we need to recognise that landfill will have a place to play in the effective management of our waste all be it at a much reduced level
Question 16	Support		Noted

Question 17	Support		Noted
Question 18	Observations	<p>A) Preferred Spatial Option : Option 5 (2nd preference option 2)</p> <p>As Chairman of the Parish I have involved the whole parish in the consultation. 90% felt option 5 most appropriate and 10% felt option 2 (with reservations). Option by far the advantages outweigh the disadvantages. The disadvantages are also easily mitigated.</p> <p>B) Yes - again taken from consultation with the parish. Attached comments are made for WCC to take account of. There is a strong pro-anaerobic digestion view.</p> <p>The following was attached as a written statement:</p> <p>With only 7 years of Landfill remaining in the U.K., it is vitally important that WCC find the right solutions in this Waste Development Framework Core Strategy consultation.</p> <p>The five district/borough areas in Warwickshire now have the perfect opportunity to protect our Green Belt for future generations; whilst setting an example to the Nation.</p> <p>Much greater emphasis should now be given to Biomass and Anaerobic Digestion within the county. Having numerous Sewage Pumping Stations, which are not shown on any of the maps and sewage Treatment Plant that i; the majority of the necessary infrastructure for Anaerobic Digestion is already in place in Warwickshire.</p>	<p>Observations are noted and refreshing to see that the Parish Council felt this to be of such importance that it had involved the whole parish in coming to its conclusion</p> <p>Anaerobic digestion fits well with National Policy</p>

Furthermore, RBC has a Materials Recovery Facility and Stobbarts are already fully equipped to transport materials for Biomass and Anaerobic Digestion (A.D.) at Crick.

With both the existing and predicted population growth in Warwickshire (3.3), the increase of sewage sludge that will inevitably be produced, alongside the agricultural slurry, food and garden waste, it could all easily be utilised to produce a sustainable renewable source of energy; providing for our needs of electricity and fuel in the future.

A.D. plants housed next to existing waste management facilities could ultimately provide income to the district and borough councils; which in turn could help solve the current financial pressures that are greatly affecting us all.

A.D. would also eliminate the need for the exorbitant Government incentives being offered to Landowners and developers of wind farms; which are totally inefficient and will ultimately be proven to be ineffective in solving our need to "Keep the lights on".

The FITs payments set in April 2010, which pays people for creating green electricity, currently pay 41p for a unit of electricity generated by the sun, 35p for that produced by wind and 11.5p for Anaerobic Digestion; it costs just 10p to buy a unit off the grid now.

In order to make Anaerobic Digestion more attractive to Landowners and as an added incentive to farmers, Anaerobic Digestion payments are currently being reviewed

		<p>by the Government. Instead of Landowners dictating the cost of our utility bills in the future, WCC should lead the way in managing our waste in a much more advantageous manner.</p> <p>Whilst the sun doesn't always shine and the wind doesn't always blow, there will never be a shortage of raw material for Anaerobic Digestion; more A.D. plants will solve many problems than just the issue of waste.</p>	
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Representor : 1171 Mrs V Pratt (Wootton Wawen Parish Council)

Heading	Nature of Response	Response / Representation	Officer comments
Question 1	Support		Noted
Question 2	Support with conditions	As with previous replies - european guidance should be removed from point 1.	WCC is obliged to take cognisance of European legislation and guidance
Question 3	Support		Noted
Question 4	Object	No - the issues identified are wide ranging and cover the key issues.	Noted that key issues are adequately covered
Question 5	Support with conditions	A sound basis on which to go forward. I do not understand at this stage how communities can actually take responsibility for their own waste.	Communities can take responsibility for their own waste by, in the first instance, preventing its generation and then by recycling as much as it can
Question 6	Support with conditions	Satisfactory way in which to proceed.	Noted
Question 7	Support with conditions	It is important that we define what is a "strategic waste management cites"	Noted

Question 8	Support with conditions	It is key that the core strategy is demonstrated to be environmentally acceptable.	Noted
Question 9	Support with conditions	Sound practical common sense!	Noted
Question 10	Support with conditions	Addresses the key issue of meeting the treatment gap.	Noted
Question 11	Support with conditions	As with 10 above addresses the key issue.	Noted
Question 12	Support with conditions	Sound basis on which to proceed.	Noted
Question 13	Support with conditions	Good balance between practical and environment concerns.	Noted
Question 14	Support with conditions	Yes - unless the non-waste activities are in any way compatible with the waste processes and can show savings in revenue and resources.	Noted
Question 15	Support with conditions	A practical solution to a difficult problem.	Noted
Question 16	Observations	Very important that environmental issues are taken into account in the assessment process.	Agreed
Question 17	Support with conditions	Represents a balanced view.	Noted
Question 18	Observations	Impossible to say because no one issue is paramount. All of the issues detailed are important and form the basis for detailed discussion and argument in developing a sound and viable waste strategy.	Comments noted. The preferred locational strategy will be put forward for widespread consultation. This is scheduled for September 2011.

Representor : 1173 Mr A.W.P. Granger (Ragley Estate)

Agent : 1172 Mr Francis THOMPSON (FTMINS)

Heading	Nature of Response	Response / Representation	Officer comments
Question 2	Support		Noted
Question 3	Support with conditions	<p>Para. 6.6 There should be a general recognition of the valuable contribution of residual C&D waste to achieve land restoration of redundant pits & quarries.</p> <p>Para. 6.8 Landfill restoration of former pits & quarries using residual (post recycling treatment) fine materials should be recognised as a "special circumstance".</p> <p>Para. 6.9 The spatial strategy for the location of C&D waste recycling facilities should be to try to locate them in former pits and quarries, using residual fine materials as part of landfill restoration.</p>	It is recognised that inert waste emanating from construction and demolition waste can be used to restore former mineral workings but this should not be at the expense of recycling and re-use
Question 5	Support		Noted
Question 5	Support		Noted
Question 6	Object	This appears to be more a statement of future action, not a policy principle	Noted but you will see that this has been referred to specifically in the question as policy direction
Question 7	Object	This principle appears to limit the provision of waste management sites, not to promote them. There are areas of the County where a waste management site would serve low populations over a wide area and such sites should not be neglected or refused consent due to them not complying with the limiting nature of this principle.	Noted
Question	Support		Noted

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Question 11	Object	The policy principle as stated does not recognise either the beneficial use C&D waste as a restoration material in achieving the landfill restoration of former pits and quarries, nor the benefit to be gained potentially (in both environmental and economic terms) from encouraging the use of former pits and quarries as locations for the siting of C&D waste recycling plants. Some flexibility is needed if this policy principle is to be sustainable in the face of the identified quantities of material historically disposed of within the County.	It is recognised that inert waste emanating from construction and demolition waste can be used to restore former mineral workings but this should not be at the expense of recycling and re-use
Question 15	Object	Landfill is the last resort of waste management. Wastes are source categorised as municipal, commercial & industrial, hazardous and inert. A sustainable policy on landfill should not be vague or generically applied to all categories. Each waste category should be assessed separately and landfill assessed for each category before trying to establish the policy principles to regulate future decisions.	Your comments are noted
Question 16	Support		Noted
Question 17	Support		Noted
Option 2	Support		Comments noted. The decision as to which spatial option will be taken forward for consultation will be made once all of the representations have been considered and the options have been evaluated through a Sustainability Appraisal.

Representor : 1176 Mr Keith Frost (Cemex UK)

Heading	Nature of Response	Response / Representation	Officer comments
Question 1	Support with conditions	The generation of energy from waste should also form part of the vision. For instance my company can use suitably pre - treated waste as alternative fuel to produce cement. there is also the opportunity to generate electricity form pre treated waste	Sustainable waste management practices and adherence to the waste hierarchy ensures that energy from waste is addressed
Question 2	Observations	<p>Objective 8 should also include the use of waste and not just refer to recovery or disposal.</p> <p>Treated waste can be used as an alternative fuel for some applications such as energy generation. In that context objective 7 should recognise that, notwithstanding PPS 10, it may be appropriate and/or necessary to locate treatment plants in the Greenbelt.</p> <p>I would like to see sustainability referred to somewhere in these objectives, e.g objective 8 amend to 'in the nearest sustainable installations.'</p>	<p>Recovery does include the use of waste as a resource for energy production Noted</p> <p>Objective 1 already refers to sustainable development</p>
Question 3	Observations	<p>Agree with 'proximity principle' but as noted previously to obtain the most desirable proximate and sustainable solution PPS10 Greenbelt principles may need to be relaxed in some areas; particularly if the intention is to try and locate facilities close to urban areas where waste is generated.</p> <p>In some cases the most appropriate use of waste may be to restore mineral workings as landfill.</p>	<p>Noted</p> <p>Agreed but only after the resource value of the waste has been maximised</p>
Question 5	Observations	Support in principle but the Council should recognise that it is probably unrealistic to be totally self sufficient in providing waste disposal facilities such that the balance of waste imported and exported is neutral.	It is well recognised that waste crosses administrative boundaries which is why the strategy is to manage an equivalent amount of waste that the County generates.

		It may be the case that is more sustainable in the round to have a facility located in Warwickshire that can treat/dispose of waste over a larger area than the County alone, particularly where there are good transport links. .	
Question 7	Support	Support but it is difficult to see how this equates with the statement in Policy principle 1.	Noted
Question 9	Support		Noted
Question 10	Support		Noted
Question 11	Support	recycling facilities can also be used to provide residual material that can be used for the restoration of mineral workings. locating such facilities on active or disused quarries could be an option.	Noted
Question 14	Support		Noted
Question 15	Support with conditions	As noted previously landfilling of waste to restore mineral workings to a beneficial afteruse can be a credible, and often, a preferred option and should not be discounted on principle.	Agreed but only after the resource value of the waste has been maximised
Question 16	Support		Noted
Question 17	Observations	Surely the last part should read 'and planning conditions' not '....planning applications'? it is difficult to see how the CC could 'enforce' planning applications.	Noted and will make the amendment
Question 18	Observations	In options 1,3,4 & 5 'Brownfield land' should include disused mineral workings	Policy will be drafted to allow for the use of disused mineral workings

Representor : 1177 Ms Laura Perry (Environment Agency)

Heading	Nature of Response	Response / Representation	Officer comments
Waste Core Strategy - Emerging Spatial Options (March 2011)	Observations	<p>Further Comments</p> <p>Cross boundary movements of waste is recognised in this document, but not discussed in any detail. Opportunities and constraints for shared facilities with other neighbouring authorities should be considered.</p> <p>We would also like to know how 'localism' will be addressed if major infrastructure is needed, either for new or expanded existing facilities. Residents will now have more opportunities to input in to what happens strategically in their communities through the use of neighbourhood plans. How this will affect the delivery of the Core Strategy must be considered.</p> <p>We could also not see reference or a clear link to a Minerals LDF, this is especially important with C&DW, landfill and existing quarry restoration schemes.</p> <p>Evidence Base</p> <p>Since the production of the Level 1 Strategic Flood Risk Assessment (SFRA), dated February 2008, undertaken by Halcrow, we have some new model information available. This includes the River Stour, some 2D modelling on the River Leam, the</p>	<p>Information on cross boundary waste flows is included in the Waste Background Technical document.</p> <p>It is understood that County matters, including minerals, have been removed from the scope of the new Neighbourhood Development Orders and Neighbourhood Development Plans. However, local communities will continue to be engaged at all stages as the Waste Core Strategy is produced and in turn, their feedback will help to influence and shape the plan.</p> <p>Noted – clear links will be provided in the next document.</p>

		<p>Shottery Brook, additional modelling through Southam on the River Itcham and the Pingle Brook. Therefore we recommend a review of the SFRA is undertaken. This will aid in undertaking the Sequential and Exception Test more accurately.</p> <p>As discussed with ourselves last year, we would still recommend that your authority undertakes a county-level Water Cycle Study (WCS) to provide the strategy and the Minerals Strategy with a sound evidence base.</p> <p>Sustainability Appraisal matrices - assessment of the Emerging Spatial Options</p> <p>We were unsure from the consultation as to whether comments were required on the above document as it was not referred to in this consultation letter.</p> <p>We note the SA or the Options document has not identified a 'do nothing' option although consider 5 possible options have been selected and tested. The scoring options appear to steer towards Option 5 with the most positives against each of the SA Objectives. We are not sure how the SA objectives were selected; therefore some explanatory and interpretative text would aid this.</p> <p>Although we are pleased to see water resources tested against each option there is no objective for water quality. Considering the potential impact waste sites can have on the water environment we strongly recommend that an additional objective on water quality is added and the effects each option will have be tested. The</p>	<p>Noted – As discussed, the next consultation document will acknowledge this and a reference will be provided to the latest 'live' EA flood maps on the web.</p> <p>Further to a meeting at the Environment Agency offices on on 2 September it is now agreed that it is unlikely there will be a need for a Water Cycle Study specifically for this waste strategy.</p> <p>It is intended that the full Sustainability Appraisal will be revised and produced for consultation before the Publication stage.</p> <p>It is considered that a 'do nothing' option is not</p>
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		<p>additional objective should be worded as follows:</p> <p>17. Protect and improve water quality.</p> <p>Given the need to meet WFD targets we consider this objective very important. We welcome the current enhancement and mitigation methods suggested for each objective and option.</p>	<p>necessarily a reasonable, realistic or relevant alternative. However, the baseline situation is set out in the main Sustainability Appraisal Report available at warwickshire.gov.uk</p> <p>Comment noted. A new objective will be included. It is intended that the full Sustainability Appraisal will be revised and produced for consultation before the Publication stage.</p> <p>Noted.</p>
2 Policy Context	Observations	<p>We welcome and support reference to the 'Waste Hierarchy', and understand that Figure 2.1 will be replaced with the revised Annex C of PPS10 in the next version of the Core Strategy (CS). It is anticipated that the government will announce revisions to its Waste Strategy imminently and it is also expected that PPS10 will be replaced in the near future. It is important that the Warwickshire Waste Development Framework is sufficiently flexible that it will be able to accommodate these forthcoming changes, whilst remaining a robust and credible document.</p> <p>In addition, the Waste Framework Directive, which is the primary European legislation for the management of waste, has been revised. Revisions to the Waste Framework Directive are being implemented in England and Wales through the Waste (England and Wales) Regulations 2011. Details can be found at the following link: http://www.environment-agency.gov.uk/business/topics/waste/128153.aspx.</p>	<p>Noted.</p> <p>Noted.</p>

		<p>Governments are preparing guidance to explain the changes, which are broad in scope and affect all waste producers and managers, including local authorities. The revised Waste Framework Directive places greater emphasis on the waste hierarchy.</p>	
3 Spatial Portrait of Warwickshire	Observations	<p>Section 3.1 acknowledges surrounding conurbations. We therefore consider it beneficial for Sub-Regional, Regional or Nationally important waste facilities to be highlighted on Figure 3.1. This would therefore demonstrate the proximity of Warwickshire waste sites to important surrounding ones.</p> <p>We welcome Figure 3.2, Warwickshire Advisory Lorry Routes and Existing Waste Sites map. We recommend that non-road transport routes such as rail-freight and canals suitable for transporting freight should also be identified on this map as these transport options demonstrate a more sustainable way of transporting waste.</p> <p>We welcome the spatial portrait of flood risk within Warwickshire as described in section 3.20. We consider it would be advantageous to also include the spatial portrait of water quality as this will highlight where improvements are needed to meet the Water Framework Directive (WFD) targets.</p> <p>As a co-deliverer of WFD, your Authority should ensure that your policies and strategies actively support its aspirations and targets. The WFD does not allow for any drop in quality of the water environment, and aims for all waterbodies achieved Good Status by 2015.</p> <p>River Basin Management Plans (RBMP) have been drawn up, which assess the current state of the water environment, by dividing up the water environment into river basins and water bodies. The RBMPs then specify what is required to be undertaken to ensure that Good Status is achieved on schedule. Warwickshire largely falls within the Severn RBMP. In the absence of RSS policies supporting the implementation of these plans, all Planning Authorities should now include a commitment towards meeting these targets within their strategic plans.</p>	<p>Noted – consideration will be given to amending the context maps.</p> <p>Noted – we will liaise with the EA to discuss how water quality and ‘opportunities’ can be included in the spatial portrait section of future documents.</p>

		<p>To achieve this, while mitigating climate change and the additional development proposed between now and 2015, policy and decision makers need to take a tough stance on the control of water pollution, ensuring betterment from the existing situation is achieved wherever possible, and the risk of contamination of Controlled Waters is minimised in all new developments and redevelopment proposals.</p> <p>More information and access to the Severn RBMPs can be found at this link: http://www.environment-agency.gov.uk/research/planning/33106.aspx</p> <p>We are pleased to see flood zones on Figure 3.3 Indicative Constraints map. We consider it worth considering creating an "opportunities" map as well as a constraints map, identifying where the greatest opportunities exist for locating/co-locating waste sites in the most sustainable locations. The Advantage Waste Midlands landfill diversion analysis tool could be used to help identify opportunities in Warwickshire.</p>	
4 Waste Management Context	Observations	<p>Municipal Waste</p> <p>The definition of municipal waste has been revised. Previously the term 'Municipal Waste' was used in UK waste policies and nationally reported data to refer to waste collected by local authorities. In fact the definition of municipal waste as described in the Landfill Directive includes both household waste and that from other sources which are similar in nature and composition, which will include a significant proportion of waste generated by businesses and not collected by Local Authorities.</p> <p>It appears that references in this document to municipal waste relate to the previously used term, i.e. Local Authority Collected Municipal Waste (LACMW). We request that these be updated to reflect new terminology.</p> <p>The change in definition could also have implications for landfill diversion targets. The Government's review of waste policies will clarify any consequences for the Landfill Allowance Trading Scheme, and this could have implications for this strategy.</p>	Noted – the definition of 'municipal waste' will be revised and amended accordingly.

		<p>Construction and Demolition Waste</p> <p>The comments made in paragraphs 4.19 and 4.20 regarding Site Waste Management Plans (SWMP) are inaccurate.</p> <p>To clarify, all projects in England with an estimated construction cost of over £300,000 must have a SWMP before work begins. The SWMP will identify who will be responsible for resource management, what types of waste will be generated, how the waste will be managed, which contractors will be used to ensure the waste is correctly recycled or disposed of responsibly and legally, and how the quantity of waste generated by the project will be measured. Although SWMPs are a legal requirement for projects costing over £300,000, they are not a licensed activity as seems to be implied here. We therefore recommend the references to licensing are removed.</p> <p>With regard to the on-site and off-site management of waste from construction sites, there are a number of regulatory controls that may apply. Certain types of activity may require an Environmental Permit, other activities may be carried out under an exemption (e.g. preparatory treatment of waste such as bailing, sorting and shredding).</p> <p>Inert waste can sometimes be put to beneficial use in construction projects for landscaping, screening or engineering purposes, replaces the need to use raw material, but your Authority should be satisfied that the waste is being put to an appropriate use, and that the volumes involved are necessary for the intended purpose.</p> <p>Excavated material can sometimes be put to a suitable use elsewhere on the site where it was excavated without requiring treatment (cut and fill), in such cases it may never actually become waste. In other circumstances excavated material may cease to be waste following treatment.</p>	<p>Noted and to be amended accordingly.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>
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Question 1	Observations	<p>The Vision sets out the direction of travel for the Waste Core Strategy in line with current National Waste Policy. However the wording could be strengthened to be more ambitious and also to place a greater emphasis on the value that sustainable waste management can bring to Warwickshire, both economically and environmentally. This could be achieved by using resources efficiently in the first instance and recovering the maximum value once something becomes waste.</p> <p>In response to Q1 the vision should:</p> <ul style="list-style-type: none"> - Include a greater emphasis on waste prevention - Inspire a changing attitude between the waste management industry and the communities they serve towards a greater level of co-operation: Waste management facilities will be well run, of a high quality of design, sensitive to their surroundings and make a positive contribution to the communities they serve both economically and environmentally. In turn this contribution will be understood and valued by the community. Communities will take responsibility for their own waste, recognise its value as a resource and embrace the concept of sustainable waste management. - Acknowledge the water environment to ensure the Strategy actively supports the aspirations and targets of WFD. 	Comments noted. The vision will be revised to take account of all representations received. It is intended that these issues will be covered however. The revised vision will be available for comment during the next stage of consultation.

Question 2	Support with conditions	<p>In response to Q2:</p> <p>We agree with the objectives. We would recommend that the second objective be modified to emphasize self-sufficiency principles, but also the need for strategic sites (i.e. where economies of scale etc dictate).</p> <p>We would recommend that the wording of the sixth objective "to have regard for the concerns and interests of local communities" be strengthened to make it more ambitious, e.g.: "to engage and empower local communities in the waste planning process, so that local communities understand and value the contribution the waste management industry makes in creating sustainable communities".</p> <p>We would suggest the following additional objectives:</p> <ul style="list-style-type: none"> - To direct development to the most appropriate locations - Promote and enable a strategic network of waste facilities, including opportunities for synergies - Protect facilities in strategic locations against incompatible non-waste development, and to enable any inappropriately located existing facilities to relocate to more sustainable locations. - To monitor and maintain capacity ensuring that sufficient capacity is maintained at each level of the waste hierarchy, and to protect against loss of capacity where this would cause waste to be managed through less sustainable management routes. <p>It would also be helpful to provide some measurable targets in this section.</p>	<p>Comments noted. The objectives will be revised to take account of all representations received. It is intended that these changes will be included. The revised objectives will be available for comment during the next stage of consultation.</p>
Question 4	Observations	<p><u>Municipal Waste Management Practices</u></p> <p>The Strategy identifies the need to meet or exceed landfill diversion targets for municipal waste, please see previous comments with regards to the definition of</p>	<p>Noted.</p>

		<p>municipal waste.</p> <p><u>Construction and Demolition Practices</u></p> <p>This identifies the need to manage C&D waste in accordance with the waste hierarchy and in particular limit the amount of C&D waste sent to landfill. It is stated this will be reinforced through increased usage of Site Waste Management Plans. Your Authority have an important role to play in driving forward the use of SWMPs ensuring sites have plans in place that meet the requirements of the regulations and that these plans are properly implemented.</p> <p><u>Waste Management Treatment and Disposal Options</u></p> <p>This section states landfilling of waste as a disposal option will be discouraged and only permitted in special circumstances. Your Authority needs to be clear about what this means. This section contains a statement "Any future waste strategy could not discount the use of incineration and thermal treatment as this would be outside Government and EU law". Please note recovering energy from waste is generally preferable to landfill and in some circumstances thermal treatment may provide an opportunity to recover energy from waste that would otherwise have been sent to landfill. We would expect your Authority to take the Waste Hierarchy into account when making planning decisions for new waste facilities, giving fair consideration to all options including thermal treatment, developing the most sustainable waste management solutions. To assist with this the Agency have developed a tool (WRATE) which is a Life Cycle Assessment tool that compares the environmental impacts of different municipal waste management options. Further information is available here: http://www.environment-agency.gov.uk/research/commercial/102922.aspx</p> <p><u>Protection of Environmental Resources</u></p> <p>Design of new facilities should be sensitive to the surrounding environs. Facilities</p>	<p>Noted.</p> <p>Noted. It is intended that there will be a specific policy on landfill in the next consultation document. This will provide details setting out when landfilling will be acceptable in principle.</p> <p>Noted – it is intended that there will be a specific policies on design of waste</p>
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		<p>should be built to a high standard. Many of the problems with waste facilities relate to difficulty controlling emissions to air, water or land, with subsequent amenity or other environmental impacts. To be a modern good neighbour, the key thing to get right in waste infrastructure design is effective physical containment of the waste and any activities that can cause emissions. Where this is impractical, suitably sized buffer zones around the site should be provided to protect receptors. Defra have produced a design guide available here: http://archive.defra.gov.uk/environment/waste/localauth/documents/designing-waste-facilities-guide.pdf.</p>	<p>management facilities and the protection of the natural and built environment in the next consultation document.</p>
7 Development of Policy Principles	Observations	<p>We would also like to see policies that will embed the waste hierarchy in non-waste developments through the principles of sustainable design and build. All developments have an impact on future waste amounts; therefore opportunities should be sought to reduce this where possible.</p> <p>We would also like to see policies that will take seek to "design out" fly tipping opportunities in future developments and in areas undergoing redevelopment.</p> <p>Enforcement powers are given to local authorities (this includes Waste Disposal Authorities, Waste Collection Authorities and Waste Planning Authorities) and ourselves. The allocation of these powers enables them to be exercised in accordance with the national fly-tipping protocol, we generally focusing on larger, more serious incidents. We are only likely to use these powers during existing investigations into illegal waste disposal incidents. Defra have produced guidance : http://archive.defra.gov.uk/environment/waste/topics/construction/pdf/swmp-guidance.pdf</p> <p>Deculverting should be promoted wherever it is encountered, with a full and accurate assessment of the potential benefits than may be achieved through this work, and the practicality of such a scheme. The effect of deculverting should be assessed in the context of the waste management proposals being considered, and the historic land use in order to ensure that any risks emanating from this are adequately considered and mitigated for. Works such as this will help move towards</p>	<p>Comments noted, however waste management considerations relating to 'district matter' developments may be better implemented through District LDFs. When responding to District Core Strategy consultations, WCC has requested that SWMPs and provision for waste management infrastructure on large scale developments (e.g. on site recycling/composting facilities) is included in LDF policies.</p> <p>Comments regarding deculverting are noted.</p>

		<p>reaching the aspirational targets set by the WFD.</p> <p>Accordingly, the culverting of open watercourses should be strongly discouraged, unless for essential access only, and with appropriate mitigation proposals.</p> <p>Landraising within the floodplain should be actively discouraged, only being allowed in exceptional circumstances only, and with adequate level for compensation.</p> <p>The above points should all be incorporated into the policies wherever possible in order to aid developers and decision makers judge the appropriateness of the location and design of future waste proposals.</p>	<p>It is intended that there will be a specific policy on landfilling/raising in the next consultation document.</p>
Question 5	Support	Yes we agree.	Noted
Question 6	Support with conditions	Yes, we would agree with this approach for the options selection and consider this approach will minimise environmental impacts.	Noted
Question 7	Observations	<p>Strategic sites should include existing sites that if lost would result in a significant loss in waste management capacity, especially if this would also result in "slippage" towards waste management options lower down the Waste Hierarchy. This should apply to all waste streams, not just C&I and municipal.</p> <p>In the case of synergies the collective value of sites may be strategically important.</p> <p>Therefore, in answer to Q7, we consider an additional point should be added to further encompass what a strategic site is:</p> <ul style="list-style-type: none"> - are existing sites that if lost would result in a significant loss in waste management capacity. 	Comments noted.

		<p>There are strategically important facilities and strategically important locations, some facilities may need relocating to more suitable locations.</p> <p>It was originally planned to divert residual waste from landfill to the proposed EfW plan in Coventry, this was a strategic site for Warwickshire. We understand that this is no longer being built. The EfW plan would have diverted waste from landfill, but as the development is no longer going ahead we would question how Warwickshire will seek alternative solutions. Warwickshire currently send some waste to the existing EfW facility in Coventry and we understand this plans to continue although the amounts are small. We therefore recommend further consideration is given to alternatives for landfill for residual waste (i.e. waste that cannot be recycled).</p>	
Question 8	Support	Yes we agree.	Noted
Question 9	Observations	<p>Current targets set in the national waste strategy are for recycling and composting of at least 45% of household waste by 2015 and 50% by 2020, targets for recovery of municipal solid waste are 67% by 2015 and 75% by 2020. Targets are set for recycling, reuse and composting which are in line with national targets, and are currently on track. However, recovery targets have not yet been mentioned. Warwickshire still sends a significant amount of waste to landfill. As stated, previously, with plans for a proposed EfW facility in Coventry no longer going ahead an opportunity to divert residual waste from landfill and recovery energy from it at this proposed facility has been lost. We would therefore like to see Policy Principle 5 consider what other opportunities exist to recover value from residual waste and reduce dependence on landfill.</p> <p>We therefore consider the following should be added to Policy Principle 6:</p> <p>'Any policy should ensure that proposals to manage municipal waste and recover value from residual waste are encouraged where they can contribute to meeting the treatment gap and diverting waste from landfill!'</p>	
Question 10	Support	Yes we agree.	

Question 11	Observations	<p>This policy will need to clearly set out the standard that is required from the construction industry. Ensuring that waste prevention, and sustainable management of waste arisings from a fundamental part of future construction projects. Waste arising during the whole life of the project should be considered including occupational phase and eventual decommissioning. It is important that resource efficiency and waste management are considered at as early a stage as possible. The authority need to be clear about they expect, and how they will ensure new developments meet these standards.</p> <p>The following should therefore be added to Policy Principle 7:</p> <p>'The Policy Principle for Construction and Demolition Waste is to encourage re-use and recycling of materials and to divert material away from landfill for the whole life of any construction project.</p> <p>The agency strongly encourages the sustainable use of resources and consequently supports programmes of waste reduction and minimisation. There are also significant opportunities for waste reduction and minimisation during the remediation of contaminated sites. Where appropriate we support remediation proposals that include the re-injection of effluent from the treatment of contaminated groundwater and/or the re-deposit of contaminated soils after ex situ treatment. However, these activities must not cause an unacceptable release to groundwater and must have appropriate permits and controls.</p>	
Question 12	Observations	<p>In this section it is stated that "Currently there is no interest in developing any hazardous waste treatment facilities at the current time". We would question what is meant by "no interest"? The document correctly that hazardous waste facilities are often sub-regional or regional. As Warwickshire has a number of strategic links to the tyransport network, including good links to the motorway network suitable locations for sub-Regional or Regional hazardous waste treatment facilities may be developed in Warwickshire cannot be ruled out. Warwickshire currently offer landfill capacity for hazardous waste, however if hazardous waste is to be successfully diverted from landfill this will require alternative technologies for treating hazardous</p>	

		waste being made available. We therefore consider this policy principle should be more open and positive towards future hazardous waste facilities within the County. Collection and storage of hazardous waste such as WEEE (Waste Electrical and Electronic Equipment), oil, clinical waste etc will also need considering in this policy.	
Question 13	Support with conditions	We welcome the consideration of the management of low level radioactive waste.	
Question 14	Observations	This section discusses safeguarding, and states "As waste facilities are often not preceived to be popular neighbour uses, where sites are functioning without problems they should be retained where popssible". We agree it is important to safeguard certain sites from the threat of conflicting land uses. This policy will need to ensure that the right types of facilities in the right places are safeguarded. There is also a need to change the perception of waste facilities being "bad neighbours". Ensuring facilities are appropriately located in the first place and designed to a high standard will go a long way towards changing this perception.	
Question 15	Observations	<p>Yes we agree with this policy principle in so far as that the Waste Core Strategy needs to ensure that sufficient landfill capacity is available throughout the plan period in line with National Policy. Landfill should truly be a last resort and should not be a substitute for providing sufficient capacity further up the waste hierarchy. Other options for treating residual waste that cannot be recycled should also be considered.</p> <p>'Environmentally acceptable' should also be defined, for example, it would be environmentally unacceptable to place a landfill in flood zone 3b as they are classified as more vulnerable under PPS25.</p> <p>The disposal of waste into landfill can present a major potential hazard to groundwater quality. Unless the waste is wholly inert, landfills represent a store of pollutants some of which will inevitably find their way into the environment. To reduce the risk to groundwater our policy is to direct landfill to areas where the risk of groundwater pollution is minimised and to avoid the situation where the development of a groundwater resource is constrained by the presence of a landfill.</p>	

		<p>This will ensure the groundwater resource is available for future generations. Consequently, any planning application for a new landfill site will be subject to the following Agency policies (as per our latest Groundwater Protection document, available on http://publications.environment-agency.gov.uk/pdf/GEHO0708BOGU-e-e.pdf):</p> <ul style="list-style-type: none"> - The Agency will object to any proposed landfill site in groundwater Source Protection Zone (SPZ 1) - For all other proposed landfill site locations, a risk assessment must be conducted based on the nature and quantity of the wastes, and the natural setting and properties of the location. - Where this risk assessment demonstrates that active long-term site management is essential to prevent long-term groundwater pollution, the Agency will object to sites: <ul style="list-style-type: none"> - below the water table in any strata where the groundwater provides an important contribution to river flow or other sensitive surface waters; - on or in a Principal Aquifer - within SPZs 2 or 3 	
Question 16	Support with conditions	<p>Yes, we agree with this policy principle. We would expect to see this policy clearly set out the standards of design that will be expected from new facilities and what measures they intend to benchmark against, therefore 'highest standards' must be defined. The Environmental Permitting regime requires operations relating to the Permitted activity to be carried out according to best available techniques (BAT) but other elements of the design such as visual appearance, incorporation of renewable energy (e.g. solar), green roofs etc are not a permitting requirement but may be a planning consideration.</p> <p>Environmental considerations should also look at wider environment not just the local as there may be wider implications on the catchment.</p> <p>One of the Key Objectives seeks to "minimise the impact of waste on climate change". We therefore consider it important that this is also carried through by</p>	

		policy within the strategy. The content of Policy Principle 12 could therefore be strengthened by referencing climate change as an overarching environmental consideration.	
Question 17	Support with conditions	<p>We are generally in agreement, however we consider it may be difficult to monitor a lot of the policy principles when they are based on the word 'encouragement'.</p> <p>The policy principles are directionally correct, but must be made more robust as recommended above. We understand that some of the waste data is from the Regional Spatial Strategy Phase 2 evidence base which is now being superseded. The most up to date data must be used. Please see Appendix 1 for further sources of information.</p>	
Question 18	Observations	<p>A) The preferred spatial option should be one that will direct new waste facilities to be developed in the most appropriate locations, but should not be so restrictive that it would prevent a realistic prospect of delivering the required waste management infrastructure. Spatial Option 5 offers a hierarchical approach while offering a comparatively high choice of locations and a certain degree of flexibility to locating waste facilities. The sites should be based on need (preferably closest to areas of highest arisings) and risk (only where proven acceptable for the environment).</p> <p>This should be accompanied by clear criteria based policies to guide location of new facilities. It is important to also recognise that different types of facilities are suited to different locations, for example waste operations that take place within a fully enclosed building may be appropriately located on an industrial estate. Open-air facilities may have different siting considerations as they may be more likely to give rise to amenity issues.</p> <p>Although we have a preference for Option 5, the storage and treatment of waste can also present risks to groundwater. Leachate or other polluting substances may leak from storage areas. Also, the waste may be hazardous in itself or contain hazardous substances such as oil in cars or chemical waste stored in drums. In general, these activities pose fewer hazards to groundwater than landfill operations,</p>	

		<p>though they are a higher risk than industrial storage. This is due to the mixed sources that mean that the nature of the waste can never be fully guaranteed. Therefore we do not wish to see these activities close to water supplies intended for human consumption due to the inherent risks associated with their operation. Consequently, in SPZ 1 we will object to proposals for new development of:</p> <ul style="list-style-type: none"> - Incinerators - Transfer stations - Vehicle dismantlers and metal recyclers (scrap yards) - Waste treatment facilities - Composting facilities - All other non-landfill waste management activities that require an Environmental Permit <p>Unless those activities are covered and enclosed, no liquid waste is handled and there are no potential emissions to ground. In all other areas outside SPZ1, we will apply a risk-based approach to management of non-landfill waste operations.</p>	
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Representor : 1178 Hartshill Parish Council

Heading	Nature of Response	Response / Representation	Officer comments
Question 1	Observations	Communication and consultation with local communities is not emphasised strongly enough.	Noted
Question 2	Support		Noted
Question 3	Support		Noted
Question	Observations	Emissions from incinerator flues.	Emissions are controlled through the permitting regime

4			administered through the Environment Agency
Question 5	Support with conditions	Wherever these locations are will cause nimbyism. I believe waste should be treated as near to where it is created as possible.	Agreed
Question 6	Support with conditions	Spread the burden equally so that no area is blighted more than another.	The spatial options presented will hopefully deliver this but clearly the exact location will be governed by the market
Question 7	Support		Noted
Question 8	Support with conditions	Constant monitoring of capacity will be required.	Noted
Question 9	Support with conditions	The more waste diverted from landfill the better.	Agreed
Question 10	Support with conditions	I agree with more recycling.	Noted
Question 11	Observations	It will be difficult to achieve a balance between the cost and disposal of recycling and use of new materials.	Agreed
Question 12	Support with conditions	I don't know how this will be achieved without compromising natural resources such as water supplies without considerable expense in preparation of sites.	The engineering requirements for landfills are prescribed in the Landfill Directive which have to be complied with for new landfill development
Question 13	Support with conditions	Good luck with this one.	Noted
Question 14	Support with conditions	As mentioned previously these operations are unpopular neighbours.	Noted
Question 15	Support with conditions	We have many 'holes in the ground' created by former industries e.g. quarrying. But are they really suitable?	Not all disused quarries will be suitable for landfill but those that are will have to be engineered in accordance with the Landfill Directive provisions.

Question 16	Support with conditions	Without due consideration of the long term impact we are building in problems for future generations.	The immediate and long term impact of any proposal will be addressed as part of the environmental assessment
Question 17	Support with conditions	'Monitor' 'Monitor' 'Monitor'	Noted
Question 18	Observations	<p>A) Preferred Spatial Option : 5</p> <p>This option spreads the burden of waste management across the county thus reducing transport movements and uses acceptable and current sites.</p> <p>B) More research into evolving technologies of waste management. Look at other countries expertise and experience e.g Germany</p>	Comments noted. The decision as to which spatial option will be taken forward for consultation will be made once all of the representations have been considered and the options have been evaluated through a Sustainability Appraisal.

Representor : 1179 Lucy Warner

Heading	Nature of Response	Response / Representation	Officer comments
Question 1-3	Support		Noted
Question 5	Observations	As long as waste disposal methods are appropriate.	Agreed
Question 6 - 17	Support		Noted
Question 18	Observations	<p>A) Preferred Spatial Option: 5</p> <p>A compromise of being close to waste</p>	Comments noted. The decision as to which spatial option will be taken forward for consultation will be made once all of the representations have been considered and the options have

		arisings/minimal impact on environment although I realise there will be increased pressure on existing infrastructure/services. B) No	been evaluated through a Sustainability Appraisal.
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Representor : 1180 Katherine Burnett (British Waterways)

Heading	Nature of Response	Response / Representation	Officer comments
Question 1	Support with conditions	<p>BW aims to help unlock the economic, environmental and social benefits offered by the waterways and to secure the long-term sustainability and use of waterways as publicly owned and community assets.</p> <p>One way of achieving this is by encouraging the transfer of freight from roads to waterborne transport where practical, economic and environmentally desirable - including use of waterborne freight in the construction cycle, for the delivery of supplies and the removal of waste.</p> <p>Part of the vision refers to "ensuring that sustainable waste management practices are delivered" This reflects the waterborne freight concept as a sustainable means of transport which is welcomed by BW.</p>	Sustainable waste management practices will include sustainable modes of transport of which waterborne transport is just one
Question 2	Support with conditions	<p>Two of the key objectives for the Waste Development Framework are:- To conserve and enhance the natural and historic environment and avoid, mitigate and compensate potential adverse effects associated with the provision of facilities. To have regard for the most sustainable means of transportation of waste in locating facilities.</p> <p>The Birmingham and Fazeley Canal, Coventry Canal, Ashby Canal, Grand Union Canal, Oxford Canal, North Stratford Canal, South Stratford Canal,</p>	Your observations are noted

Brinklow Arm (Oxford Canal), Brownsover Arm (Oxford Canal), Clifton Arm (Oxford Canal), Newbold Arm (Oxford Canal), Rugby Arm (Oxford Canal), Stretton Arm (Oxford Canal), Engine Arm (Oxford Canal), Kingswood Arm (N Stratford Canal), Saltisford Arm (Grand Union Canal) are the canals within Warwickshire. The distinctiveness and historic character of these canals within the County should be considered protected, mitigated and enhanced.

The canal corridors add to the local distinctiveness of the County and are built heritage assets and natural wildlife resources. The waterways provide water related habitats supporting protected species, fauna and flora. The value of these assets should be protected but not so as to prevent the potential of these multifunctional assets from being fully unlocked.

Waterborne freight is a sustainable means of transporting waste and a number of waste sites can be found adjacent to the canals within Warwickshire.

BW considers that the inland waterway network is particularly suitable for short hauls, high volume, predominantly low value products which are not time sensitive and for addressing niche market goods, where it can provide a cost effective alternative to the local road network. In waterborne freight transport terms any freight carriage must be compatible with the waterways' roles for leisure, sport and recreation use, and as ecosystems.

Figure 3.1 Warwickshire Waste Context Map highlights the canals within the county and the location of waste sites. In summary, based on the map at its current scale there appears to be a : HWRC site at Stratford; Materials Recovery site at Napton; Hazardous Waste site at Southam; Scrap Metals site at Leamington Spa; HWRC at Leamington Spa; Waste Transfer Station at Warwick; Scrap Metals site at Warwick; Materials Recovery site at Bedworth; Minerals Site at Bedworth; Inert Landfill at Bedworth; Non Hazardous Landfill at Nuneaton; Mineral Site at Nuneaton; Mineral Site at Hartshill; Thermal Treatment site at Hartshill; Waste Separation and De-packing site at Hartshill;

		and scrap metals site at Polesworth.	
Question 5	Support with conditions	Policy Principle 1 directs that "Sustainable transport systems will ensure that waste is managed as close as possible to where it arises". As previously mentioned waterborne freight is a sustainable transport system and could provide a cost effective means of sustainable transport.	Noted
Question 16	Support with conditions	<p>Policy Principle 12 directs that "The Core Strategy will protect the local environment by ensuring that there are no unacceptable adverse impacts from waste developments on the natural or built environment.</p> <p>The canal infrastructure forms part of the built environment of Warwickshire and can potentially be affected by all scales and types of development located adjacent to or in close proximity to the canal infrastructure. BW welcomes the policy principle, the canals should be protected from adverse impacts from waste developments but not so as to prevent the potential of these multifunctional assets from being fully unlocked.</p>	Noted
Question 18	Observations	In regard to the proposed spatial options, BW does not have a preference and BW's priorities relate to the canal corridor and land and development within and immediately adjacent to the corridor. With any type of development British Waterways would require development to not adversely affect the integrity of the waterway structure, quality of the water, result in unauthorised discharges and run off or encroachment, detrimentally affect the landscape, heritage, ecological quality and character of the waterways, prevent the waterways potential for being fully unlocked or discourage the use of the waterway network. The waterways can be used as tools in place making and place shaping, and contribute to the creation of sustainable communities. British Waterways would seek for any development to relate appropriately to the waterway and optimise the benefits such a location can generate for all parts of the community.	Noted

Representor : 1181 Ged Duckworth (GD Environmental on behalf of Lichen Renewal)

Heading	Nature of Response	Response / Representation	Officer comments
1 Introduction	Observations	<p>Lichen Renewal is a company that specialises in bringing environmentally damaged land back into beneficial use. Lichen Renewal has identified a major opportunity to solve the multiple pollution problems associated with historic landfill sites i.e. leachate and green house gas emissions, in particular methane, by deploying new leading technologies. Moreover, the process utilises recovered waste to contain and restore the environmental carrying capacity of the site and provide additional environmental benefits through renewable energy generation and recreational facilities. In essence, the transformative role undertakes to turn environmental liabilities into resources.</p> <p>Lichen Renewal have already identified a number of former landfill sites across the UK where their remediation and development technique could be used to facilitate environmental, economic and social improvements to the existing environmentally damaged land. The process can be carried out at any historic landfill site in Warwickshire where biodegradable waste continues to produce landfill gas (including privately owned sites). Sites can be capped and/or restored by Lichen Renewal.</p> <p>The Waste (England and Wales) Regulations 2011 (Statutory Instrument 2011 No 988) states that "historical contaminated waste disposal sites and measures for their rehabilitation" is a matter which may be included in waste management plans (Part 3 regulation 12d)</p> <p>Lichen Renewal is keen to work with Local Government in providing an economic and environmentally sound solution to their green</p>	Noted

waste and historic landfill sites.

Lichen Renewal Proposals

The UK has a target to reduce greenhouse gas emissions by 34% by 2020 following the Climate Change Act of 2008, and has also signed up to deliver 15% of its energy through renewables by 2020 as part of the EU Renewable Energy Directive. Even in light of the recent change in Government and subsequent revocation of Regional Spatial Strategies, there is still a requirement at local level to drive towards meeting these targets. Lichen Renewal has identified a process which will make significant contributions to both of these targets and have added social, environmental and economic benefits. Lichen Renewal want to raise awareness of their process and how it can have considerable positive impacts at a very local level, including the movement of considerable volumes of waste up the "waste hierarchy".

The underlying principle of Lichen Renewal's proposals is to facilitate environmental, economic and social improvements through the restoration of environmentally damaged land, namely historic landfill sites. Historic municipal waste landfill sites can cause pollution. Once they have ceased accepting waste for disposal they may continue to produce significant volumes of landfill gas (primarily methane and carbon dioxide) and contaminative leachate. Where historically poor or limited capping of former landfills has occurred this results in the uncontrolled emission of methane, a powerful greenhouse gas, into the atmosphere and further leachate production subsequently leading to wider scale groundwater pollution. Lichen Renewal aims not only to reduce significantly the pollution associated with existing landfill sites, but also seeks to bring them back into a productive use.

The process proposed by Lichen Renewal involves the provision of a cap to the historic landfill sites. The cap will be engineered from pulverised fuel ash (PFA) with added lime which provides a low permeability layer. The cap will both reduce the uncontrolled emissions of methane into the atmosphere and minimise the amount of water that can enter the site and cause leachate seepage. Any surface water run-off will be managed as part of a Sustainable Drainage System (SuDS) and potentially used for crop irrigation. The SuDS will ensure that additional flood risk will not occur.

Lichen Renewal's proposals provide an opportunity to accommodate both inert and non-inert waste and reduce the need for it to be sent to landfill. The production of a restoration soil layer which will be manufactured from "suitable for use" waste streams will help divert these from operational landfill. Whilst some of these waste streams would not meet the strict definition of inert waste (e.g. the organic content of green waste which will biodegrade) they are considered suitable given the proposed use that Lichen Renewal will put them to. The manufactured soil layer will be placed above the cap to protect it from drying out and to prevent roots from trees and plants growing through it. This top soil will be free draining and mimic a silt/clay type soil, providing suitable conditions for the proposed after use. This soil layer is manufactured from recovered suitable waste and includes:

- excavated soils from local development sites
- compost (e.g. from parks and garden waste)
- biosolids (e.g. sewage sludge cake)
- brick rubble (as a drainage layer)
- biochar (a by product of burning biomass in the absence of oxygen)

to produce syngas that provides a matrix that holds in nutrients and allows slow release, as well as providing a free draining property; and
- pulverised fuel ash

The activity is classed as a "recovery" operation given that the wastes substitute for natural materials that would otherwise be used, as determined in the European Court of Justice Case Law (Abfall Services). The wastes are not being disposed of. They are put to a particular use, it just so happens to be on an historic landfill, and hence are moved up the waste hierarchy.

The methane that is prevented from escaping by the cap will be captured and used to dry green waste prior to it proceeding to the gasification/pyrolysis plant or potentially used directly for energy generation. The gasification/pyrolysis process produces renewable energy in the form of "syngas" (i.e. synthetic gas). The heat from this process could be used to heat greenhouses and to enhance crop growth. Or more importantly used in district heating schemes especially where new development is proposed close to a former landfill site.

The after-use of the restored sites would vary depending on the setting, particularly its proximity to built development. The uses that are being proposed by Lichen Renewal include primarily renewable energy generation, agriculture and recreation.

Lichen Renewal have assessed the existing impact of historic 'dilute and disperse' landfill sites nationally and consider that the opportunity to reduce the proximate adverse environmental impacts of these polluting sites should be taken. The double-headed approach of dealing with the past and the future elements in an

integrated fashion contributes to both the mitigation of anthropogenically produced green house gases and the adaptation in land use terms to the early keying in of green infrastructure that would support further development. In this light, Lichen Renewal want to secure recognition and support for the use of former landfill sites for this process in the Emerging Spatial Options. To make the subsequent Waste and Minerals strategy sound the use of former landfills as detailed above should be considered in detail.

It is important to clarify that Lichen Renewals' proposals do not involve landfill operations and are to be classified as a "waste recovery" and restoration process; it will be essential that this differentiation is made in any forthcoming policy. Lichen Renewal understands that landfill is the last option for waste management with regard to the waste hierarchy, and in submitting these representations, are not promoting the use of landfill, but the diversion of waste from operational landfill (where it is "disposed" of) and its subsequent re-use in the remediation and restoration process in substitution for other natural materials that would otherwise been used i.e. natural clay and soils. The approach us akin to the remediation and restoration of any other land that may be affected by contamination.

Essentially, Lichen Renewal, through these representations, wish to secure changes to the emerging plans which will demonstrate a stronger commitment to pollution reduction and the improvement of environmentally damaged land that has occurred due to past waste management processes, as detailed in the Waste (England and Wales) Regulation 2011. Only when there is explicit acknowledgement in planning terms of the contribution that the delivery of improved historic and 'sterilised' waste land to the carbon reduction commitment as set out in the Climate Change Act 2008

		<p>should the document be considered sound and successful in adhering to national policy. It is pertinent to the delivery of the strategy that accounting for these emissions within the strategy will make a concerted and significant contribution to the carbon reduction commitment espoused by DECC.</p> <p>The proposals deliver in terms of:</p> <ul style="list-style-type: none"> - the proximity principle (re-using local excavation and construction waste from developments which can be recovered for beneficial use in the local vicinity); - moving waste up the waste hierarchy - generating energy, electricity and heat, from waste (including historic waste deposits and gasification/pyrolysis of green waste); - climate change mitigation and adaptation; - transition to a zero waste economy; and - community gain (e.g. amenity, reduced pollution and green jobs) <p>With regards to the waste hierarchy Lichen Renewal would draw your attention to the fact that the hierarchy does not have to be followed where there is a technical justification. Given that the aim will be to produce biochar (biological charcoal) from the gasification/pyrolysis process to incorporate in to the restoration soils it should be noted that biochar sequesters carbon for hundreds of years whereas composting only sequesters carbon for less than ten years. Hence the gasification/pyrolysis proposed should fit above composting. The adopted strategy should allow for such flexibility in decision making.</p>	
Question 1	Object	No. The vision over emphasises composting. The carbon sequestered in carbon is released in less than 10 years. This needs to be compared with gasification/pyrolysis which can produce biochar (biological charcoal) which sequesters carbon for	Composting is just one of a number of options but is spelt out here as it is a process that is easily recognised

		hundreds of years. The biochar can be used as part of a restoration soil on former landfills as set out above. Additionally with regards to the waste hierarchy a technical justification can be applied where a more sustainable approach can be demonstrated, such that the hierarchy does not have to be slavishly adhered to.	
Question 2	Observations	The objectives should address historic waste disposal activities in terms of their on going greenhouse gas emissions and leachate affecting groundwaters and not be restricted to future facilities. The last objective (proximity principle) should include "recovery" in the second part (it is in the first part but the second part only relates to disposal).	The core strategy is for the provision of new waste infrastructure for the future and does not deal with the waste legacy
Question 3	Observations	Extending existing facilities may not represent the most sustainable solution.	Existing facilities represents just one of a number of options
Question 4	Observations	Addressing pollution and methane emissions from former landfills should be a key issue. The re-use of former landfills to recover energy from waste, whilst utilising methane from previous deposited waste and producing renewable energy e.g. gasification/pyrolysis is a sustainable holistic approach. A fundamental rethink on the life cycle analysis of composting (and its relative position in the waste hierarchy) is needed. Historical landfills with an on going economic activity e.g. gasification/pyrolysis formally linked with future development should be a key issue (methane used to dry green waste prior to gasification and the green waste arising from the development dealt with on the door step (so to speak).	The core strategy is for the provision of new waste infrastructure for the future and does not deal with the waste legacy
Question 5	Support with conditions	Agree with the policy direction on sustainable waste management. The Lichen Renewal approach as outlined above provides a sustainable solution for green waste arisings, on going methane emissions from former sites and a renewable energy component (either feed in to the grid or linked with new proposed development).	Noted
Question 6	Observations	The strategy should include assessment of the use of former	Noted

		landfills.	
Question 7	Observations	The strategic sites should link to future growth areas with the use of former landfills included.	Noted
Question 8	Object	No. A more sustainable facility may come forward in the future which was not recognised in developing the chosen spatial strategy. The policy should be more flexible and allow for this situation.	The policies will be developed to allow for the flexibility you suggest
Question 9	Object	No. The policy is predicated on the use of composting (para 7.6). The carbon is only sequestered for less than 10 years. Gasification/pyrolysis whilst producing renewable energy (in the form of syngas) also can sequester carbon, in the form of biochar, for hundreds of years. Also see comment relating to the chosen spatial strategy in answer to question 8.	Composting is just one of a number of options but is spelt out here as it is a process that is easily recognised
Question 10	Object	No. In so far as we have commented on the chosen spatial strategy in answering Q8 above.	See response to 8 above
Question 11	Object	No. It seems odd to have a policy to "encourage" a specific statutory requirement i.e. the need to produce a Site Waste Management Plan (for construction projects in excess of £300k). To not produce one is an offence.	Noted but it fits within the overall need to recycle construction and demolition waste
Question 14	Observations	Provided this is not a presumption that existing sites should be extended given other locations and activities may provide a more sustainable solution.	Noted
Question 16	Object	No. In that "the highest possible standard" may not represent the most sustainable solution i.e. over design and standards higher than what is actually needed may be a simple waste of resources.	Clearly there needs to be a balance between the highest possible standards and a sustainable solution but that should not stop us from trying to achieve the highest possible standards within the constraints of sustainability
Question 17	Support		Noted

Question 18	Observations	<p>Should have an option that allows for waste management facilities upon former landfill sites where methane can be utilised (not necessarily as a standalone project, but in combination with other economic activities), particularly where future built development is considered.</p> <p>Definition - please note that the definition of "contaminated land" is wrong. The land can be put to a useful purpose without the contamination being "removed". Removal is just one option, other are to treat the contamination, block or modify the pathway and/or change behaviour or protect the receptor.</p>	<p>Noted</p> <p>Will delete the word "removing" and replace it with "isolating"</p>
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Representor : 1182 Mr Adam Smith (HW Martin Waste Ltd)

Heading	Nature of Response	Response / Representation	Officer comments
Question 1	Object	Add waste treatment after listing recycling and composting.	Agreed
Question 2	Support		Noted
Question 3	Support		Noted
Question 5	Support with conditions	Agree with proximity principle.	Noted
Question 6-13	Support		Noted
Question 14	Observations	Could this policy work against permissions for new more sustainable facilities. If the land around waste facilities is sterilised adjacent landowners may	Your submission is duly noted and will be taken into account when we finalise the proposals

		object to new permissions.	
Question 15	Support		Noted
Question 16	Observations	Highest possible standard implies excessive build costs. Operational standards and build standard should be best practice not necessarily highest standard.	This is not necessarily the case but we should aim for standards that are acceptable to the community
Question 17	Support		Noted
Question 18	Observations	<p>A) Preferred Spatial Option: 1</p> <p>B) Option 5 has merit but would rule out smaller scale operations that could utilise an industrial unit that fall outside of the proximity zones.</p> <p>Not all new waste management infrastructure will be large scale. Option 1 would allow small scale facilities in the south of the county.</p> <p>Perhaps the policy needs to allow discretion based on size - stronger need for proximity principle for larger tonnages.</p>	Comments noted. The decision as to which spatial option will be taken forward for consultation will be made once all of the representations have been considered and the options have been evaluated through a Sustainability Appraisal.

Representor : 1183 Mr John Hind (UK Coal Mining Ltd)

Heading	Nature of Response	Response / Representation	Officer comments
Question 1	Observations		?
Question 2	Support		Noted
Question 3	Object	There is no mention of providing for mineral waste sites to facilitate continuing underground extraction e.g. coal from Daw Mill Colliery.	The WDF is for controlled waste and mines and quarry waste is not covered by this definition
Question 4	Observations	See above. This was written.	See above
Question 5	Support		Noted
Question 6	Observations		?
Question 10	Observations	Mining waste does not appear to be covered at all in this document and should be included as it is for mineral safeguarding.	See response to Q3 above
Question 13	Observations	See Q10. Where does mining waste fit, is it required or is it covered under mineral policy.	See response to Q3 above
Question 14	Support		Noted
Question 15	Observations	Would a mineral waste site fall under this banner. It shouldn't but needs clarifying.	No but as the WDF only deals with controlled waste clarification is unnecessary
Question 16	Support		Noted
Question	Support		Noted

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Representor : 305 Ms Laura Weston (Gloucestershire County Council)

Heading	Nature of Response	Response / Representation	Officer comments
7 Development of Policy Principles	Observations	Gloucestershire County Council would like to highlight that it is important that Warwickshire County Council ensure the issue of landfill is monitored throughout the Waste Core Strategy to ensure that there are adequate facilities within the County. We would also support Warwickshire becoming self sufficient on dealing with hazardous waste as suggested in the consultation.	Effective monitoring will ensure this

Representor : 1184 Mr Adam Harrison (Centro)

Heading	Nature of Response	Response / Representation	Officer comments
Question 2	Support with conditions	<p>Although this plan covers an area outside of the Centro area and we chosen not to answer any specific question, Centro welcomes that the Core Strategy aims "To help deliver sustainable development by using waste as a resource by moving it up the waste hierarchy in accordance with European, national and regional guidance".</p> <p>Centro considers that all plans within the wider West Midlands area should demonstrate that full consideration has been given to sustainable transport opportunities available. Centro also supports Strategic Objective "To have regard for the most sustainable means of transportation of waste in locating facilities"</p>	Noted
Question 3	Support		Noted

Representor : 1185 Mr Neil Hansen (The Highways Agency)

Heading	Nature of Response	Response / Representation	Officer comments
Question 1	Support		Noted
Question 2	Support with conditions	Yes, especially that which refers to having regard to sustainable means of transporting waste when considering locations for facilities.	Noted
Question 3	Support		Noted
Question 5	Support with conditions	The HA welcomes this draft policy that seeks to maximise the use of sustainable transport systems and minimise the distance, as much as possible, between where waste is generated and where it is treated.	Noted
Question 6	Observations	Please see responses to questions on chapter 8 for HA comments on the proposed spatial options.	See comments below with reference to Q18
Question 7	Support with conditions	The HA notes the reference to good transport links as one of the characteristics of a strategic site however the Agency would like to see this policy promote the use of sustainable modes of transport. Additionally the definition could be expanded to promote the location of strategic sites as close to the main areas of waste generation as possible.	It is expected that the reference to the principles of proximity and self sufficiency will create such a position
Question 14	Support with conditions	The HA welcomes a policy that safeguards those waste developments which do not have a detrimental impact on the strategic road network (SRN).	Noted
Question 17	Support with conditions	This will help safeguard the safety and free flow of traffic on the SRN.	Noted
Question 18	Observations	The HA can see the benefits of spatial options 4 and 5. However at this stage in the preparation of the Waste Core Strategy the HA is not in a position to favour one option above another. Also the HA is concerned that one of the advantages of option 5 identified by the consultation document is that the primary settlements	Your comments are noted and WCC welcomes the opportunity to meet and discuss the issues raised with the HA

	<p>are served by transport routes such as the A45/A46 axis and this may result in a detrimental impact on the SRN.</p> <p>We consider a meeting with WCC Waste Management and Transport Officers would be useful to establish if any necessary infrastructure improvements on the SRN can be identified and agreed at this stage. We would also like to establish and agree funding and delivery processes for any necessary infrastructure improvements on the SRN.</p> <p>In general the HA favours the location of facilities that will have the least impact on the strategic road network (SRN). This is likely to include existing facilities and those on brownfield, industrial land where the type of traffic movements likely to be generated would be expected to be broadly similar to that which already exists.</p> <p>Paragraphs 41 - 42 of Circular 02/07: Planning and Strategic Road Network gives guidance on the new accesses onto the trunk road. There will be a presumption in favour of using existing accesses. Additionally, facilities located within or close to areas where the highest amount of waste is generated and where there is easy access to sustainable transport, thereby reducing the need to travel, would be favoured by the HA.</p>	
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Representor : 1186 Joanna Illingworth (The Kenilworth Society)

Heading	Nature of Response	Response / Representation	Officer comments
Question 1	Observations	The Vision Statement contains nothing that we disagree with. However it should include something about non-recyclable waste to generate energy. There should also be a commitment to encouraging businesses and individuals to avoid unnecessary use of resources, e.g. packaging in the first place.	Sustainable waste management practices would include the use of residual waste as an energy source

Question 2	Support		Noted
Question 3	Support		Noted
Question 4	Observations	Only the use of non-recyclable waste to generate energy.	Noted
Question 5	Support with conditions	Proximity makes sense in that it cuts down transport costs and greenhouse gases. It is to be hoped that neighbouring authorities adopt the same policy and do not try to export their waste to Warwickshire unless it has benefits for us, e.g. generating energy.	Noted
Questions 6 - 8	Support		Noted
Question 9	Observations	Home composting is the most efficient and environmentally friendly way of disposing of organic waste and reducing the amount sent to landfill. However an increase in home composting will lead to a reduction in local authorities' recycling rates. There is a conflict between the targets that waste authorities are set and good "green" practice. This needs to be addressed.	Warwickshire already encourages home composting despite the impact this might have on its recycling rates/targets as it recognises that this is the more sustainable option
Question 10	Support		Noted
Question 11	Support with conditions	It is important that policies on construction and demolition waste do not inadvertently encourage more fly tipping.	Noted whilst recognising this is a potential consequence of such a policy
Question 12	Support		Noted
Question 13	Observations	This Policy Principle appears to lump together a lot of different types of waste that one would think needed different treatment.	Although there are a number of wastes identified they can be included under just the 3 headings of inert, non hazardous and hazardous and they were shown in the way that they are for ease of reference

Questions 14 - 17	Support		Noted
Question 18	Observations	<p>A) Preferred Spatial Option: Option 3 or Option 4</p> <p>We are keen to ensure that the Kenilworth Recycling Centre at Pipers Lane is retained. It is well run, well situated and an asset to the town.</p> <p>All towns and large villages should have their own recycling centres. If they do not there will inevitably be an increase in fly tipping.</p>	<p>Comments noted. The decision as to which spatial option will be taken forward for consultation will be made once all of the representations have been considered and the options have been evaluated through a Sustainability Appraisal.</p>

Representor : 1187 Cllr Alan Crichton

Heading	Nature of Response	Response / Representation	Officer comments
Question 1	Support		
Question 2	Support with conditions	Not sure if point 5 covers this, but waste facilities must be sited for convenient access by residents for household waste.	Principle of proximity will address this
Question 3	Support		Noted
Question 4	Observations	Disposal of hazardous waste for householder use only should not be charged for to encourage responsible disposal.	Noted
Questions 6 - 17	Support		Noted
Question 18	Observations	<p>A) Preferred Option: Option 5</p> <p>Option 5 seems to be the most flexible solution that is most likely to deliver the policy principles stated in this document.</p>	Noted

		As this option can be delivered at three levels it will provide the flexibility needed to balance the sometimes conflicting requirements. However, the Stratford district appears to have a large area without local facilities. Perhaps local transfer stations could be provided or additional flexibility delivered through the weekly collection service for household waste.	
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Representor : 1188 Kenilworth Town Council

Heading	Nature of Response	Response / Representation	Officer comments
Question 1	Object	Energy recovery should be added before composting. This is in line with Government Policy.	Sustainable waste management practices accommodates energy from waste
Question 2	Support		Noted
Question 3	Support		Noted
Question 4	Observations	None we can see.	Noted
Question 5	Support with conditions	We must avoid import of waste from Birmingham and Coventry.	Unfortunately administrative boundaries do not prevail as market forces dominate
Question 6	Support		Noted
Question 7	Support		Noted
Question 8	Support	No viable alternative.	Noted
Question 9	Observations	Will require close working with Districts and Boroughs carrying out the collection in order to further increase recycling rates. We believe that a more flexible definition of municipal waste which included community facilities such as village halls and churches would help to increase overall recycling rates.	Noted
Question	Support		Noted

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Question 11	Support with conditions	There is not enough emphasis on avoiding waste arising in the first place particularly in the building and construction industries.	Noted
Question 12	Support		Noted
Question 13	Support with conditions	The preamble appears to suggest that all medical waste is radioactive. Biohazards should also be considered and included here.	Will reword the preamble to make the distinction
Questions 14 - 17	Support		Noted
Question 18	Observations	<p>A) Preferred Spatial Option: Unable to say</p> <p>We find it impossible to determine the best option as the quantitative information is not available to us and therefore we are restricted to a very subjective view. Possibly Options 3 and 4 are ideal and there is really little apparent difference between them.</p> <p>We are keen to keep the Household Waste Reception Centre here in Kenilworth as it is a valued and well-used facility in the town. As there is little other industrial or brownfield land in the town and we are surrounded by the green belt any other future development would have to be out of town and will undoubtedly involve travel, but this is the situation with domestic waste and recyclables already.</p>	Noted

Representor : 1189 Mark Hammond (Rugby Friends of the Earth)

Heading	Nature of Response	Response / Representation	Officer comments
Question 1	Object	Put more emphasis on moving materials up the waste hierarchy.	The waste hierarchy provides the thrust for the document in any event
Question	Object	Those given should all be there; should add an objective to minimise the	Adopting the principles of proximity

2		need for transporting of waste. [An example would be by encouraging home composting]	and self sufficiency should deliver this
Question 3	Support		Noted
Question 4	Observations	Actions to raise awareness of hidden waste costs in commercial and industrial premises. [Explanatory example: use and throwing away of plastic cups by staff].	Noted
Question 5	Object	Largely agree but here is a need to use a more specific term than "sustainable transport systems".	Noted – will be amended to “waste management proposals must seek to use alternatives to road transport where feasible”
Question 6	Support		Noted
Question 7	Object	The first and second criteria in particular would tend to act against the principles of self sufficiency and proximity. Given those principles, strategic sites (those central to achievement of the strategy) would be those providing a local function (not regional or sub-regional).	Noted, however the framework will provide the strategy for both ‘strategic’ and ‘non strategic’ sites.
Question 8	Object	<p>1) Capacity estimates need to relate not just to total tonnage but to different types of material to be dealt with.</p> <p>2) In dealing with treatment capacity gaps, consideration should be given not just to increasing treatment capacity but to influencing waste producers to reduce their demand for waste treatment.</p> <p>3) If a potential shortfall is identified, the immediate response should be to try to curb demand.</p>	Every effort will be made to manage waste in accordance with the waste hierarchy
Question 9	Observations	We agree with the policy principle as stated in the first sentence here but are not convinced that the second sentence is consistent with this principle.	Noted
Question	Observations	We agree with the policy principle as stated in the first sentence here but	Noted

10		are not convinced that the second sentence is consistent with this principle.	
Question 11	Observations	We agree with most of this principle but question the use of the phrase "in or around urban centres". This policy should apply everywhere.	Encouraging but not necessarily restricted to
Question 12	Observations	We agree that such waste should be treated where possible and that a policy is needed. However the implications of the second sentence are unclear.	It is just to note that there are some hazardous wastes such as asbestos cement for which treatment is not an option
Question 13	Support with conditions	Waste being created in the county should be dealt with in the county where possible, thus reducing the need for transport of these materials.	Noted
Question 14	Support		Noted
Question 15	Support with conditions	The general policy principles will mean that landfill will only be used when there is no viable alternative.	Agreed
Question 16	Support		Noted
Question 17	Support		Noted
Question 18	Observations	<p>A) Preferred Spatial Option: 5 BUT without part iii.</p> <p>More likely to have facilities co-lated with arisings, whilst encouraging developers to follow options which place greater emphasis on the policy principles of proximity, self sufficiency and accordance with the objectives of the waste hierarchy.</p> <p>B) It's not clear whether this question refers to (i) other spatial options listed in the document or (ii) other spatial options not already listed.</p> <p>If (i), then also consider option 3.</p>	<p>Noted</p> <p>Is asking if you have any thoughts on an additional option that WCC has not considered so your response of no is accepted</p>

		If (ii) then no.	
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Representor : 1190 Ms Louise Brockett (Redditch Borough Council)

Heading	Nature of Response	Response / Representation	Officer comments
Waste Core Strategy - Emerging Spatial Options (March 2011)	Observations	Thank you for providing Redditch Borough Council with the opportunity to comment on the above document. I can confirm that we have no comments to make at this stage; however we look forward to being consulted on the next stage of the document.	Noted

Representor : 1191 Mr Jonathan Parkhouse (Warwickshire County Council - Heritage and Cultural Services)

Heading	Nature of Response	Response / Representation	Officer comments
Waste Core Strategy - Emerging Spatial Options (March 2011)	Object	Thank you for the opportunity to comment upon the Waste Core Strategy Emerging Spatial Options Consultation. This appears to broadly follow the previous 2006 iterations of the document in terms of the historic environment content.	Agreed
Waste Core Strategy - Emerging Spatial Options (March 2011)	Support	<p>Thank you for the opportunity to comment on the WDF Core Strategy Emerging Spatial Options Consultation. This appears to follow the previous 2006 iterations of the document in terms of its historic environment content.</p> <p>We understand that you received comments form Natural England, English Heritage and other associated groups and would welcome the opportunity to talk with you how to integrate these responses in to the next document within the process.</p> <p>We shall be happy to provide site specific advice at the appropriate time.</p>	Noted
Question 2	Support	It is good to see the inclusion of the intention to enhance and conserve the Natural and Historic Environment and to avoid, mitigate and compensate potential adverse	Noted

		effects amongst the key objectives in 5.4	
Question 2	Support	It is good to see the inclusion of the intention to enhance and conserve the Natural and Historic Environment and to avoid mitigate and compensate potential adverse effects amongst the key objectives in 5.4	Noted
Question 3	Support	Similarly we support the principles of environmental protection set out in 6.12.	Noted
Question 3	Support	Similarly we support the principles set out in 6.12	Noted
Question 16	Support	Again we support the principles set out in 7.20-21 and policy principle 12.	Noted

Representor : 1192 Mr Robert Grainger (Wolston Parish Council)

Heading	Nature of Response	Response / Representation	Officer comments
Question 1	Support		Noted
Question 2	Support with conditions	But with regard to 5.4.5, add '...', waste in locating facilities "whilst maximising efficiencies of scale ." But with regard 5.4.8., to amend 'disposed' to read 'processed or managed' (refer to 7.1)	Will amend bullet point 5 to reflect your suggested wording
Question 3	Support with conditions	Suggest better communication needed.	Noted
Question 4	Observations	Yes. Specialist recovery of rare metals from electronic equipment. Accept that this is expensive so best done in collaboration with other bodies on a regional basis etc.	Already dealt with by specialist handlers
Question 5	Support	But misses out on responsibilities of communities.	Noted
Question 6	Support with conditions	Broadly yes, but don't like the use of the word 'development', suggest management, facilities or processing instead.	Noted

Question 7	Support with conditions	This appears inconsistent with Para 1.3, which refers to 'uncertainties' about the further development of the Coventry 'Energy to Waste' plant	Agreed
Question 8	Support with conditions	Broadly yes. Responses are that the principle is well explained and appears to be complete.	Noted
Question 9	Support	No further comments	Noted
Question 10	Support with conditions	The statement in sentence 2 of 7.9 concerns me - is Warwickshire seen as a 'soft target' for disposal of construction and demolition waste? 7.10 is fully supported.	Well established treatment which "imports" C&D waste from the conurbation
Question 11	Object	We should actively seek to manage a reduction of the amount of C&D waste that is processed.	Noted
Question 12	Support with conditions	Yes, but also need to co-operate with other authorities to maximise affordability of treatment. Also need to seek to reduce imports.	Already working jointly with neighbouring authorities in the delivery of the Warwickshire Municipal Waste Management Strategy
Question 13	Support with conditions	Agree - the policy principle is well explained.	Noted
Question 14	Support		Noted
Question 15	Support with conditions	Yes, but expensive, and great effort should be made to reduce landfill to an absolute minimum.	With the increases in Landfill tax alternatives to landfill are now economically viable
Question 16	Support	No further comment. The policy is worded well.	Noted
Question 17	Support	No further comment. The policy is worded well.	Noted
Question	Observations	A) Preferred Spatial Option: 4	Noted

18		<p>Option 4 seems to be the best solution, maximising gains and minimising disadvantages.</p> <p>B) No. In general the consultation document is very well researched and constructed and all options seem to be included.</p>	
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Representor : 1193 Mr Paul Webster (Forestry Commission)

Heading	Nature of Response	Response / Representation	Officer comments
Question 18	Observations	B) The Forestry Commission wishes to see waste managed to the optimum efficiency so that it has no detrimental effect on trees, woodland and green infrastructure in Warwickshire.	Noted

Representor : 1194 Marie Rendell

Heading	Nature of Response	Response / Representation	Officer comments
Question 1	Observations	"Minimised" needs to be clearer in that a figure should be given."Minimised" is too woolly	Noted
Question 2	Support	Yes - agree	Noted
Question 3	Support		Noted
Question 4	Support	Not that I am aware	Noted
Questions 5 - 9	Support		Noted
Question 10	Support	The need to reduce the source of the waste materials.	Noted

Question 11	Support		Noted
Question 12	Support		Noted
Question 13	Support	No reference to reducing the potential waste at sources.	This is covered by reference to the waste hierarchy which places minimisation at the top
Question 14	Support	Surely a non waste development must be more acceptable than a development that generates wastes.	It is often difficult to secure new waste development so safeguarding existing facilities from the encroachment of non waste development is considered helpful
Questions 15 - 17	Support		Noted
Question 18	Support	a) Preferred Spatial Option = No 2 Existing infrastructure v attractive + existing use + transport. b) Option 3 would be second choice.	Noted

Representor : 1195 Mr Alan Bulpin (Waste Recycling Group Ltd)

Heading	Nature of Response	Response / Representation	Officer comments
Question 1	Support with conditions	Generally yes but there should be recognition and consideration of the significant role Coventry and its regional waste treatment facilities play in the compilation of WCC's Core Strategy.	Will ensure that this is reflected in the contextual sections
Question 2	Observations	Reference to "...Avoid, mitigate and compensate potential adverse effects associated with the provision of facilities" in the third box listed under 5.4 Key Objectives is misleading. There is no requirement under planning law to compensate potential adverse effects for waste related activities. Regard to "most sustainable means of transportation of waste" and "to have regard	Noted

		for the concerns and interests of local communities is laudable but should not be given undue weight. It must be just one factor in the decision making process.	
Question 3	Observations	<p>The WPA needs to be mindful that the objective of locating waste management operations in and around urban areas close to the waste source will not sit comfortably with residents who may consider they could be adversely affected by waste developments.</p> <p>In respect of the Utilization of Existing Sites for the Provision of New Facilities - it is essential the Core Strategy provides scope for the provision of new sites and as a consequence WRG are firmly of the opinion that a flexible approach must be adopted.</p> <p>Re Paragraph 6.13. - WRG would question the need for a "mix" of sustainable transport solution. Surely it would be acceptable to locate waste treatment facilities near to just one sustainable transport solution provided there were no unacceptable adverse impacts on local communities?</p>	<p>It is recognised that this will not be easy</p> <p>Noted</p> <p>A "mix" of sustainable transport solutions allows the flexibility that you refer to</p>
Question 5	Observations	WRG broadly agree with the intention of this Policy but would urge the WPA to ensure all relevant policies have a degree of flexibility particularly with regard to proximity and self sufficiency.	Noted
Question 6	Support	Yes. The WPA has embarked on detailed consultation with the industry and other interested parties and this process should continue throughout the formulation of the WDF.	Your comment is welcomed
Question 7	Observations	PP3 The Core Strategy should only make provision for a Strategic Site only if there is one or more sites which achieve all the criteria identified.....	Noted but felt it important to have a view on what a strategic site might be
Question 8	Observations	PP4 It is an acknowledged fact that reliable C&I data is notoriously difficult to obtain. The 15 year Core Strategy must therefore be mindful that data provision may improve and, as a consequence, the Policy must include scope to re-examine treatment gap capacity throughout the Plan period.	Noted and agreed
Question 9	Support		Noted

Question 10	Observations	PP6 Our response to Q8 equally applies here.	Noted and agreed
Question 14	Observations	PP10 The safeguarding of sites is not the preferred solution as it infers artificially regulating land uses. Waste treatment facilities should be regulated to operate effectively without adversely affecting neighbouring uses or restricting the potential for new sensitive developments.	Noted and agreed
Question 15	Observations	The waste industry is currently undergoing a period of significant change. As a consequence WRG believe this Policy should not be too prescriptive. Maintaining flexibility is vitally important to keeping the situation under review and to enable the process of change to evolve throughout the 15 year Plan Period. Inert landfill offers significant scope for improved restoration opportunities and should be encouraged.	WCC is mindful of having a strategy that has the flexibility that will ensure deliverability
Option 1	Object		Noted
Option 2	Object		Noted
Option 3	Object		Noted
Option 4	Object		Noted
Question 18	Support	Planning applications including the accompanying Environmental Statements need to be considered on their respective merits. WRG support Spatial Option 5 because it provides the greatest flexibility which is essential for a 15 year Core Strategy.	Noted

Representor : 1196 Mr Andy Donnelly (CEPOG)

Heading	Nature of Response	Response / Representation	Officer comments
Waste Core Strategy - Emerging Spatial	Support	<p>Waste Management Context</p> <p>It would be helpful for the municipal waste section to recognise the sub-regional links that exist in the management of waste within Coventry, Solihull and Warwickshire, as well as the links with other neighbouring Metropolitan Authorities that manage some of their municipal waste in</p>	Will include more detail in the contextual section

Options (March 2011)		Warwickshire.	
Question 1	Other	We have no comments on the Vision.	Noted
Question 2	Other	We have no comments on the key objectives..	Noted
6 What are the Key Issues?	Support	<p>Question 3</p> <p>We have the following comments on the key issues identified.</p> <p><u>Sustainable Waste Management Practices</u></p> <p>We support the aspiration towards self-sufficiency as this is a key principle of Article 16 of the Waste Framework Directive (WFD). However, this is likely to be easier to achieve at regional or sub-regional levels than at individual waste planning authority level.</p> <p><u>Sustainable Municipal Waste Practices</u></p> <p>For municipal waste, shared facilities and/ or contracts with commercial operators are often the only economically viable option. There need not be any conflict with the proximity principle, if facilities are conveniently located in relation to the authorities that share them.</p> <p>We therefore consider that cross-boundary contractual arrangements need to be taken into account when planning for the management of municipal waste. For example, Sandwell MBC, Solihull MBC and Walsall Council currently have contracts to dispose of residual municipal waste at Packington. Solihull MBC and Walsall Council also have contracts to manage green garden waste at Packington.</p>	<p>WCC recognises that there will be cross boundary movement of waste</p> <p>See above</p>

		<p><u>Waste Management - Treatment and Disposal Options</u></p> <p>The approach towards landfilling is consistent with national policy guidance and Article 4 of the WFD, which establishes the “waste hierarchy” as a priority order for all member states. However, the WFD also recognises that technical feasibility and economic viability are factors in deciding how waste should be managed.</p> <p>Whilst recovery rates of more than 90% are feasible, it is unlikely to be economically viable to achieve “zero waste,” even if it is technically feasible. Landfill will therefore continue to have a role in managing wastes that cannot be practicably managed in any other way, such as asbestos and waste residues. This should be factored into any calculations relating to future landfill requirements.</p> <p><u>Protection of Environmental Resources</u></p> <p>We suggest there are much broader environmental considerations than just the protection of environmental assets. A wide range of environmental issues and potential environmental impacts – positive as well as negative - will need to be considered when planning for waste management. Apart from the statutorily designated sites and design issues mentioned here and in Policy Principle 12, these will include:</p> <ul style="list-style-type: none"> • Impacts on the water environment – water supplies, water quality, flood risk and surface water management; • Impacts on material resources – sustainable resource management, reducing the need for raw materials; • Impacts on ground conditions – hydrology, contamination, pollution control and mining legacy; • Impacts on causes and effects of climate change - reduction in carbon emissions, generation of renewable energy, sustainable resource management. 	<p>Noted</p> <p>By reference to the built and natural environment WCC believes these issues are adequately addressed</p>
Question 4	Support	We have not identified any other key issues.	Noted
Question	Support	Policy Principle 1 - see response to Question 3 above - comments on Sustainable Waste	See above

5		Management Practices.	
Question 6	Observations	Policy Principle 2 - see response to Questions 18a and 18b.	See below
Question 7	Support with conditions	Policy Principle 3 – we recommend safeguarding municipal waste management infrastructure which is likely to be required in the long-term, including waste transfer stations, household waste recycling centres and treatment facilities that are managing municipal waste under long-term waste management contracts. There is also a case for safeguarding merchant facilities with significant capacity, particularly where they form part of a national network of facilities. This could include landfill sites which provide a regional or sub-regional resource for disposal of residual waste, such as Packington.	Safeguarding in this instance refers to the retention of a cordon sanitaire around existing waste treatment facilities to try and overcome the opportunity for objection should proposals come forward for new infrastructure on existing sites
Question 9	Support with conditions	Policy Principle 5 - see response to Question 3 above – comments on Sustainable Municipal Waste Practices and Waste Management – Treatment and Disposal Options.	See comments to 3 above
Question 14	Support	Policy Principle 10 – see response to Question 7 above. We support the general principle that “strategic” waste management sites that have a sub-regional role should be safeguarded.	See comments to 7 above
Question 15	Support	Policy Principle 11 – see response to Question 3 above – comments on Waste Management – Treatment and Disposal Options.	See comments to 3 above
Question 16	Support	Policy Principle 12 – see response to Question 3 above – Protection of Environmental Resources.	See comments to 3 above
Question 18	Support with conditions	It seems to us that Option 5 best reflects the relationship of Warwickshire to the West Midlands Metropolitan Area, though while linkages with Coventry are identified, those with Solihull MBC are not.	Noted

		<p>The sustainability appraisal is meant to be applied to “strategic” options, so we would recommend reducing the options to no more than 2 or 3 if possible, before beginning the appraisal. For example, the differences between Options 3 and 4 appear to be negligible and could be combined.</p> <p>We should also point out that CLG is currently consulting on a proposal to allow permitted change of use from the commercial and industrial use classes (Use Classes B1, B2, B8) to residential (Use Class C3). The closing date for comments is 30 June.</p> <p>See CLG website for details: http://www.communities.gov.uk/publications/planningandbuilding/relaxationchangeconsultation</p> <p>If this proposal is implemented, it could undermine employment land allocations and safeguarding policies in LDFs, as well as the options under consideration. There will be nothing to stop employment land being developed with housing, and existing waste management facilities could also be affected by housing encroachment.</p>	
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Representor : 1197 Rachel Bust (The Coal Authority)

Heading	Nature of Response	Response / Representation	Officer comments
Waste Core Strategy - Emerging Spatial Options (March 2011)	Object	<p>The Coal Authority is a Non-Departmental Public Body sponsored by the Department of Energy and Climate Change (DECC). The Coal Authority was established by Parliament in 1994 to undertake specific statutory responsibilities associated with the licensing of coal mining operations in Britain; handle subsidence claims which are not the responsibility of licensed coalmine operators; deal with property and historic liability issues and provide information on coal mining.</p> <p>The Coal Authority re-engaged with the three planning systems across England, Scotland and Wales. The main areas of planning interest to The Coal Authority in terms of policy making</p>	

relate to:

- the safeguarding of coal as a mineral in accordance with the advice contained in MPS1 and MPG3 in England; and
- ensuring that future development is undertaken safely and reduce the future liability on the tax payer for subsidence and other mining related hazards claims arising from the legacy of coal mining in accordance with the advice in PPG14 and MPG3 in England.

BACKGROUND TO COAL RELATED ISSUES IN WARWICKSHIRE

Surface Coal Resources, Energy Minerals and Prior Extraction

Although it is acknowledged that the Waste Core Strategy does not cover minerals specifically, as you will be aware the Warwickshire area contains coal resources which are capable of extraction by surface mining operations. This information is available to Mineral Planning Authorities free of charge from The Coal Authority following signing a data sharing licence/ memorandum of understanding and was given to Warwickshire County Council in August 2009.

The Coal Authority is keen to ensure that coal resources are not unduly sterilised by new development. In instances where this may be the case, The Coal Authority would be seeking prior extraction of the coal. Prior extraction of coal also has the benefit of removing any potential land Protecting the public and the environment in coal mining areas instability problems in the process. Contact details for individual operators that may be able to assist with coal extraction in advance of development can be obtained from the Confederation of Coal Producers' website at www.coalpro.co.uk/members.shtml.

As The Coal Authority owns the coal on behalf of the state, if a development is to intersect the ground then specific written permission of the Coal Authority may be required.

Coal Mining Legacy

As you will also be aware, the Warwickshire area has been subjected to coal mining which will have left a legacy. Whilst most past mining is generally benign in nature, potential public safety and stability problems can be triggered and uncovered by development activities.

Problems can include collapses of mine entries and shallow coal mine workings, emissions of mine gases, incidents of spontaneous combustion, and the discharge of water from abandoned coal mines. These surface hazards can be found in any coal mining area, particularly where coal exists near to the surface. The Coal Authority defines areas where these legacy issues may occur.

The Coal Authority has records of over 171,000 coal mine entries across the coalfields, although there are thought to be many more unrecorded. Shallow coal which is present near the surface can give rise to stability, gas and potential spontaneous combustion problems. Even in areas where coal mining was deep, in some geological conditions cracks or fissures can appear at the surface. It is estimated that as many as 2 million of the 7.7 million properties across the coalfields may lie in areas with the potential to be affected by these problems. In our view, the planning processes in coalfield areas need to take account of the coal mining legacy issues. The principal source of guidance is PPG14, which despite its age still contains the science and best practice on how to safely treat unstable ground.

Within the Warwickshire area there are over 700 recorded mine entries and 7 coal mining related hazards have been reported to The Coal Authority. Mine entries may be located in built up areas, often under buildings where the owners and occupiers have no knowledge of their presence unless they have received a mining report during the property transaction. Mine entries can also be present in open space and areas of green infrastructure, potentially just under the surface of grassed areas. Mine entries and mining legacy matters should be considered by the Local Planning Authority to ensure site allocations and other policies and programmes will not lead to future public safety hazards.

Although mining legacy is as a result of mineral workings it is important that new development recognises the problems and how they can be positively addressed. However, it is important to note that land instability and mining legacy is not a complete constraint on the new

development;
rather it can be argued that because mining legacy matters have been addressed the new development is safe, stable and sustainable.

SPECIFIC COMMENTS ON THE WASTE CORE STRATEGY (EMERGING SPATIAL OPTIONS)

The comments and/or changes which The Coal Authority would like to make or see in relation to the above DPD are:

Representation No.1

Test of Soundness

Justified Effective Consistency With National Policy

x

Comment –

As outlined above, parts of Warwickshire are affected by the legacy of former coal mining activity and there is therefore the potential for land instability and other public safety issues within the plan Protecting the public and the environment in coal mining areas area. This will need to be taken into account and addressed by proposals for new waste management facilities in accordance with PPG14 (Development on Unstable Land).

In addition, there are surface coal resources within the plan area and, in line with the guidance in MPS1 (Planning and Minerals), it is necessary to ensure that these are not sterilised unnecessarily by new waste developments. Where it is necessary for the development of new waste management facilities to take place in areas of surface coal resource, consideration should be given to whether the coal resource could be extracted in advance of the development.

Whilst The Coal Authority has no particular preference for any of the emerging spatial options, it should be noted that most would involve the development of waste management facilities within areas affected by the legacy of past coal mining and within areas of surface coal resource.

For the reasons outlined above, The Coal Authority therefore considers that the Waste Core Strategy should incorporate appropriate policy criteria to ensure that new waste management facilities take into account and address any coal-mining related land instability and other public safety issues. In addition, the plan should include appropriate policy criteria to ensure that, where new waste management facilities are proposed within areas of surface coal resource, consideration is given to the prior extraction of the resource.

Reason –

To meet the requirements of PPG14 (Development on Unstable Land) and MPS1 (Planning and Minerals).

CONCLUSION

The Coal Authority welcomes the opportunity to make these comments. We are, of course, willing to discuss the comments made above in further detail if desired and would be happy to negotiate suitable wording to address any of our concerns. The Coal Authority also wishes to continue to be consulted both informally if required and formally on future stages.

Thank you for your attention.

For and on behalf of

Miss Rachael A. Bust B.Sc.(Hons), MA, M.Sc., LL.M., AMIEnvSci., MIPSM, MRTPI

Chief Planner

Representor : 1198 Mr Brian Brown

Heading	Nature of Response	Response / Representation	Officer comments
Question 1	Support with conditions	But ensure that everyone recycles properly and fly tipping is stopped or penalised.	Agreed, however this is better covered under the County's Waste Minimisation and Municipal Waste Management Strategies as the Core Strategy is primarily a land use planning document.
Question 2	Support		Noted
Question 3	Support with conditions	But should include intentions to implement my comments in 1) above.	As above
Question 4	Support with conditions	Yes - to consider more categories and for recycling.	Noted
Question 5	Support with conditions	Hopefully it will be easier for people to dispose of none collected waste.	A comprehensive network of Household Waste Recycling Centres exist throughout the County for the disposal of non collected waste
Question 6	Support	It seems the most logical.	Noted
Question 7	Support	As 6) above.	Noted
Question 8	Support	As 6) above.	Noted
Question 9	Support with conditions	As long as it treated seriously and householders are made to recycle every waste product properly.	Clearly this requires the buy in of the public but on the evidence to date which shows increasing levels of recycling year on year there is no reason to doubt that this won't happen
Question 10	Support	As 6) above.	Noted
Question 11	Support with conditions	As 6) above and because C&D waste can take up large volumes of landfill.	Of the waste streams that are covered by this framework C&D waste has the greatest potential for recycling and recovery

Question 12	Support with conditions	As 6) above but ways should be found to be able to dispose of the hazardous waste that cannot be fully treated at present.	Noted
Question 13	Support with conditions	These wastes will surely affect underground water courses if landfilled.	Effective landfill engineering in accord with the provisions of the Landfill Directive will mitigate against this
Question 14	Support	As 6) above	Noted
Question 15	Support with conditions	As 6) above but what about using old mine workings for disposals?	Noted but mine workings are usually wet with direct links to both groundwater and surface water which would limit there suitability
Question 16	Support	As 6) above.	Noted
Question 17	Support with conditions	This is a "must".	Noted
Question 18	Observations	A) Preferred Spatial Option: 2 Not really sure but 2 seems as if it will have the least impact on the community and countryside.	Noted

Representor : 1199 Warwick District Council (Warwick District Council)

ID / Type	Heading	Nature of Response	Response / Representation	Officer comments
Question	Question 1	Support with conditions	In general terms, the vision is in accordance with the Warwick District SCS which aims to minimise environmental impacts, and protect the built and natural environment. However, the first sentence of the second paragraph and the third paragraph are more akin to policy statements or objectives, than being part of a vision and may be better incorporated as key objectives. Furthermore, the	The vision is being revisited to reflect a number of observations

			third paragraph if retained should be amended to also include reference to protecting and conserving the 'urban' characteristics of Warwickshire which are equally important. It is also queried why there is no reference to how waste management planning might be used to address inequalities that exist by geography within the County which is part of the County-wide SCS vision.	
Question	Question 2	Support with conditions	These objectives are considered to be in accordance with the aims of the SCS. In addition to the comments in paragraph 3.3, it is queried why there is no objective in relation to using the waste development framework to address inequalities that exist by geography within the County. It is also queried whether no's 5 and 6 are actually objectives, or guiding principles or policies for the WCS. The draft WCS will need to show clearly how these objectives are to be achieved through policies and/or actions of the Warwickshire Waste Partnership.	?
Question	Question 3	Support	These are still considered appropriate issues to address.	Noted
Question	Question 4	Observations	However, an additional two key issues should also be considered. Firstly, the potential for waste management to be used to address the causes of climate change, i.e. through waste to energy, should be considered particularly in light of more recent Government announcements on the importance of securing energy from waste. The policy approach towards such facilities associated with major new developments should therefore be considered through this process. The second additional issue is the need to review all existing publicly owned waste management facilities as to their future use having regard to changing land use patterns, changing waste management requirements and demands, the remaining lifespan of the facility, and whether or not they remain 'fit for purpose'. In light of the budgetary pressures on local authorities, a related issue is how facilities required in the future may be funded, and in particular whether criteria for prioritising between potential	Adherence to the waste hierarchy will address matters of climate change. Your second comment is noted but is not one for the Core Strategy to address

			new facilities is required.	
Question	Questions 5 - 13	Support		Noted
Question	Question 14	Support with conditions	In particular, Policy Principle 10 which seeks to safeguard the county's waste management capacity from non-waste developments through the District planning application process is supported given the importance of existing capacity in meeting future needs.	Noted
Question	Question 15	Support		Noted
Question	Question 16	Support with conditions	Also, Policy Principle 12 is supported given the importance of protecting the local environment from adverse impacts of waste development.	Noted
Question	Question 17	Support		Noted
Question	Question 18	Observations	<p>It is a challenge to draft a single spatial strategy for new waste facilities given different types of facility will have differing locational requirements, for example a household waste facility will need to be near centres of population, whereas a hazardous landfill site may need to be remote but accessible to the main trunk road network. Therefore, proximity to centres of population as indicated in options 3,4 and 5 may not always be relevant or the 'best option'. However, it is considered there are some guiding principles that can be adopted to inform a strategy based on a hybrid of the five options above:</p> <ul style="list-style-type: none"> - Where new waste management facilities are required, the starting point should be to assess all existing sites for their suitability to accommodate the facility required (including through expansion) having regard to the following factors: - accessibility to the source of the waste (where relevant to the type 	Your observations are noted and will be considered as policies are developed

		<p>of waste);</p> <ul style="list-style-type: none"> - the capacity of the site and the existing infrastructure that serves it; - transport connections; - land availability; - environmental and amenity constraints, and the local communities acceptance/tolerance of the existing facility; - the site's long term future following review; - Where no existing sites are suitable, new sites will be chosen for waste management facilities having regard to the following factors: <ul style="list-style-type: none"> - accessibility to the source of the waste (where relevant to the type of waste); - ability to reuse previously developed and/or contaminated land wherever possible; - ability to contribute towards addressing inequalities within the County; - ability to avoid causing harm to any european, national and locally designated sites of environmental or historical importance, including the West Midlands Green Belt; and - ability to bring together nearby existing facilities onto one site. <p>In addition to the above, the council would like consideration given to the following points prior to the preparation of the draft WCS:</p> <ul style="list-style-type: none"> - the achievement of the draft vision and many of the draft key objectives will not be achieved in isolation by the Waste Core Strategy or the County Council, but will require the co-operation and participation of the Districts and Boroughs as waste collection authorities, including their contractors. This needs to be acknowledged in the draft WCS; - the draft WCS will need to reflect the National Waste Strategy to be published shortly; - the draft WCS will need to reflect the strategies and aspirations of the Warwickshire Waste Partnership as set out in their current 	
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		Business Plan; and - the vision and objectives within the draft WCS will need to have regard to the current budgetary pressures on local authorities.	
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Representor : 1200 Craig (Polesworth Parish Council)

Heading	Nature of Response	Response / Representation	Officer comments
Waste Core Strategy - Emerging Spatial Options (March 2011)	Observations	The above consultation document has been thoroughly studied by individual members of the parish council. The councillors agree that they can offer no comment because the document, as constituted, is far too vague and much greater detail and clarity is needed to enable meaningful consultation.	Noted

Representor : 1201 Damien Holdstock (Entec UK LTD (on behalf of National Grid))

Heading	Nature of Response	Response / Representation	Officer comments
Waste Core Strategy - Emerging Spatial Options (March 2011)	Observations	<p>National Grid has recently appointed Entec to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the current consultation on the above document.</p> <p><u>Overview - National Grid</u></p> <p>National Grid is a leading international energy infrastructure business. In the UK National Grid's business includes electricity and gas transmission networks and gas distribution networks as described below.</p> <p><u>Electricity Transmission</u></p>	Observations noted

National Grid, as the holder of a licence to transmit electricity under the Electricity Act 1989, has a statutory duty to develop and maintain an efficient, co-ordinated and economical transmission system of electricity and to facilitate competition in the supply and generation of electricity.

National Grid operates the national electricity transmission network across Great Britain and owns and maintains the network in England and Wales, providing electricity supplies from generating stations to local distribution companies. We do not distribute electricity to individual premises ourselves, but our role in the wholesale market is key to ensuring a reliable and quality supply to all. National Grid's high voltage electricity system, which operates 400,000 and 275,000 volts, is made up of approximately 22,000 pylons with an overhead line route length of 4,500 miles, 420 miles of underground cable and 337 substations. Separate regional companies own and operate the electricity distribution networks that comprise overhead lines and cables at 132,000 volts and below. It is the role of these local distribution companies to distribute electricity to homes and businesses.

To facilitate competition in the supply and generation of electricity, National Grid must offer a connection to any proposed generator, major industry or distribution network operator who wishes to generate electricity or requires a high voltage electricity supply. Often proposals for new electricity projects involve transmission reinforcements remote from the generating site, such as new overhead lines or new development at substations. If there are significant demand increases across a local distribution electricity network area then the local network distribution operator may seek reinforcements at an existing substation or a new grid supply point. In addition National Grid may undertake development works at its existing substations to meet changing patterns or generation and supply.

Gas Transmission

National Grid owns and operates the high pressure gas transmission system in England, Scotland and Wales that consists of approximately 4,300 miles of pipelines and 26 compressor stations connecting to 8 distribution networks. National Grid has a duty to develop and maintain an efficient co-ordinated and economical transmission system for the conveyance of gas and respond to requests for new gas supplies in certain circumstances.

New gas transmission infrastructure developments (pipelines and associated installations) are periodically required to meet increases in demand and changes in patterns of supply. Developments to our network as a result of specific connection requests e.g. power stations, and requests for additional capacity on our network from gas shippers. Generally network developments to provide supplies to the local gas distribution network are as a result of overall demand growth in a region rather than site specific developments.

Gas Distribution

National Grid also owns and operates approximately 82,000 miles of lower-pressure distribution gas mains in the north west of England, the West Midlands, East of England and North London - almost half of Britain's gas distribution network, delivering gas to around 11 million homes, offices and factories. National Grid does not supply gas, but provides the networks through which it flows. Reinforcements and developments of our local distribution network generally are as a result of overall demand growth in a region rather than site specific developments. A competitive market operates for the connection of new developments.

National Grid and Local Development Plan Documents

The Energy White Paper makes clear that UK energy systems will undergo a significant change over the next 20 years. To meet the goals of the white paper it will be necessary to revise and update much of the UK's energy infrastructure during this period. There will be a requirement for:

- An expansion of national infrastructure (e.g. overhead power lines, underground cables, extending substations, new gas pipelines and associated installations).
- New forms of infrastructure (e.g. smaller scale distributed generation, gas storage sites).

Our gas and electricity infrastructure is sited across the country and many stakeholders and communities have an interest in our activities. We believe our long-term success is based on having a constructive and sustainable relationship with our stakeholders. Our transmission pipelines and overhead lines were originally routed in consultation with local planning authorities

and designed to avoid major development areas but since installation much development may have taken place near our routes.

We therefore wish to be involved in the preparation, alteration and review of Development Plan Documents (DPDs) which may affect our assets including policies and plans relating to the following issues:

- Any policies relating to overhead transmission lines, underground cables or gas pipeline installations
- Site specific allocations/land use policies affecting sites crossed by overhead lines, underground cables or gas transmission pipelines
- Land use policies/development proposed adjacent to existing high voltage electricity substation sites and gas above ground installations
- Any policies relating to the diverting or undergrounding of overhead transmission lines
- Other policies relating to infrastructure or utility provision
- Policies relating to development in the countryside
- Landscape policies
- Waste and mineral plans

In addition, we also want to be consulted by developers and local authorities on planning applications, which may affect our assets and are happy to provide pre-application advice. Our aim in this is to ensure that the safe and secure transportation of electricity and gas is not compromised.

National Grid infrastructure within Warwickshire County Council's administrative area

Electricity Transmission

National Grid's high voltage electricity overhead transmission lines/underground cables within Warwickshire County Council's administrative area that form an essential part of the electricity transmission network in England and Wales include the following:

- 4ZWW line - 400kV route from Coventry substation in Coventry to Hams Hall substation in North Warwickshire
- ZF line - 400kV route from Drakelow substation in South Derbyshire to Feckenham substation in Redditch via Hams Hall substation in North Warwickshire.
- YYA line - 275kV route from Berkswell substation in Solihull to Coventry substation in Coventry
- 4WP line - 400kV route from Coventry substation in Coventry to the ZL line in Blaby,
- 4VU line - 400kV route from Nechells substation in Birmingham to Hams Hall substation in North Warwickshire.

The following substations are also located within the administrative area of Warwickshire County Council:

- Hams Hall substation - 400kV & 275kV
- Lea Marston substation - 132kV

National Grid has provided information in relation to electricity transmission assets via the following internet link:

<http://www.nationalgrid.com/uk/LandandDevelopment/DDC/GasElectricNW>

Gas Transmission

National Grid has the following gas transmission assets located within the administrative area of Warwickshire County Council:

Ref: Pipeline

- FM02 Churchover to Wormington
- FM02 Duddington to Churchover
- FM04 Blaby to Alrewas
- FM14 Churchover to Wormington
- FM14 Churchover to Alrewas

FM23 Newbold Pacey to Honeybourne
FM23 Churchover to Newbold Pacey

National Grid has provided information in relation to gas transmission assets via the following internet link:

<http://www.nationalgrid.com/uk/LandandDevelopment/DDC/GasElectricNW>

Gas Distribution

National Grid Gas Distribution owns and operates the local gas distribution network in the Warwickshire area. If you require site specific advice relating to our gas distribution network then information should be sought from:

[address removed]

Further Advice

National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. In addition the following publications are available from the National Grid website or by contacting us at the address below

National Grid's commitments when undertaking works in the UK - Our Stakeholder, community and amenity policy

Specification for safe working in the vicinity of National Grid High pressure Gas Pipelines and Associated Installations - Requirements for third parties

A sense of place - Design guidelines for development near high voltage overhead lines

Please remember to consult National Grid on any Development Plan Document (DPD) or site-

		specific proposals that could affect our infrastructure.	
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Representor : 1202 NUN & BED BOROUGH COUNCIL

Heading	Nature of Response	Response / Representation	Officer comments
Questions 1-3	Support		Noted
Question 5	Support with conditions	NBBC agrees with the above principles and views them as the best approach to the sustainable management of waste.	Noted
Question 6	Support with conditions	It is logical to set out the preferred locational strategy in the Preferred Option version of the document to take into account the responses from this consultation.	Noted
Question 7	Support with conditions	Nuneaton and Bedworth Borough Council requests that it is kept thoroughly informed in the allocation of strategic and energy to waste sites.	Noted
Question 8	Support with conditions	NBBC would like the words 'in accordance with the principles of proximity, self-sufficiency and the Waste Hierarchy' to be inserted after the word 'capacity'.	Re-wording agreed
Question 9	Support with conditions	NBBC would like the word 'proximity' to be inserted before self-sufficiency.	Re-wording agreed
Question 10	Support with conditions	NBBC agrees that the principles of proximity, self-sufficiency and the waste hierarchy are the most appropriate way to manage waste sustainably.	Noted
Question 11	Support with conditions	NBBC would like the words 'that incorporate the principles of proximity, self-sufficiency and the waste hierarchy' after the word 'Plans'.	Re-wording agreed
Question 12	Support		Noted
Question 13	Support with conditions	NBBC would like the word 'proximity' to be inserted after the words 'principles of'.	Re-wording agreed
Question	Support		Noted

14			
Question 15	Support with conditions	NBBC would like the words 'and in accordance with the principles of proximity, self-sufficiency and the waste hierarchy' inserted after the word 'acceptable'.	Re-wording agreed
Question 16	Observations	As referred to in para. 7.21, NBBC would like reference to be made to mitigation and compensation measures that would be required where development overrides the interest of the environment but cannot be adequately mitigated.	Noted
Question 17	Support		Noted
Question 18	Observations	<p>A) Preferred Spatial Option: 5</p> <p>NBBC considers this the most sustainable option as it follows more closely the principles of proximity, self-sufficiency and the waste hierarchy.</p> <p>Option 5 is preferred as it is the most sophisticated approach. Option 5 directs new waste facilities to the largest settlements and hence the areas which potentially have the highest waste arisings. It sets out a settlement hierarchy option based on areas of higher population and/or existing waste management capacity. In this option, priority is given to locations within or in close proximity to the 'primary' settlements (over 20,000 population) including Nuneaton and Bedworth, before looking at 'secondary' settlements (over 6,000 population) and then finally locations outside primary and secondary settlements.</p> <p>The other advantages listed are that:</p> <ul style="list-style-type: none"> - The primary settlements are served by principle transport routes - There is a comparatively high choice of sites for consideration - The infrastructure is already largely in place at existing waste facilities; - Existing uses have been tested for acceptability; - There is scope for for co-location of facilities <p>The following disadvantages are listed:</p>	Noted

- There is no clear definition of 'in close proximity' as this may vary with the waste stream and capacity;
- There will be increased pressure on the existing infrastructure and services in these locations;
- The impact of new waste management facilities will need to be reassessed

Two further points are relevant to the chosen spatial option:

The policy principles are clear that the strategy will accord with objectives of the Waste Hierarchy and the principles of proximity and self-sufficiency. The spatial strategy for identifying sites should also be clear that the sites chosen will accord with the stated policy principles. For example, waste facilities are located close to where the waste arises. Whilst it is recognised that some specialist facilities are needed, Nuneaton and Bedworth does not want to provide general waste facilities for other authorities. The fact that neighbouring authorities do not have primary settlements should not mean that Nuneaton and Bedworth, both being identified as primary settlements, provide new waste facilities to take the waste arisings of their neighbours. This will not accord with the principles of proximity and self sufficiency.

In addition, the spatial option should be clear that areas of Green Belt and the Countryside should not be considered as suitable locations for waste facilities. NBBC would like the words 'excluding areas of Green Belt and the Countryside' to be inserted after the words 'close proximity'.

B) Option 4, is the next most sophisticated option but it does not take a hierarchy approach. Hence secondary settlements are equal to primary settlements in terms of site identification for new waste facilities. This may mean that new sites less close to the areas of highest waste arisings than in Option 5.

Two further points are relevant to the chosen spatial option:

The policy principles are clear that the strategy will accord with objectives of the Waste Hierarchy and the principles of proximity and self sufficiency. The Spatial strategy for identifying sites should also be clear that the sites chosen will accord with the stated policy principles. For example, waste

		<p>facilities are located close to where the waste arises. Whilst it is recognised that some specialist facilities are needed, Nuneaton and Bedworth does not want to provide general waste facilities for other authorities.</p> <p>In addition, the spatial option should be clear that areas of Green Belt and the Countryside should not be considered as suitable locations for waste facilities. NBBC would like the words 'excluding areas of Green Belt and the countryside' to be inserted after the words 'close proximity'.</p>	
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Representor : 1203 BARBY & ONLEY PC

Heading	Nature of Response	Response / Representation	Officer comments
Waste Core Strategy - Emerging Spatial Options (March 2011)	Observations	Barby and Onley Parish Council has no comments to make on this Waste Core Strategy consultation, but please can you keep us informed.	Noted

Representor : 1204 Michelle Spruth (SITA UK)

Heading	Nature of Response	Response / Representation	Officer comments
Question 1	Observations	<p>As well as meeting Warwickshire's current needs the Vision Statement should also incorporate the need to make adequate provision for waste treatment, recovering and disposal capacity for future generations. Waste facilities take some 7 years from conception to becoming operational with a 25 year operational life of the facility, the provision of capacity should be future focused in meeting the needs of Warwickshire.</p> <p>The vision of promoting sustainable waste management in accordance with the waste hierarchy is supported. However, the vision fails to acknowledge the role that recovery (the 5th component of the waste hierarchy) and using waste as a source of energy can play in the</p>	The vision statement is to be revised and your observation with respect to recovery is noted

		provision of sustainable waste management planning over the plan period.	
Question 2	Observations	<p>The objective of promoting and delivering sustainable waste management is supported. Climate change is the Government's principal concern with respect to sustainability. PPS 1 Supplement on Climate Change states that "The Government believes that climate change is the greatest long-term challenge facing the world today. Addressing climate change is therefore the Government's principal concern for sustainable development</p> <p>It is SITA's view that the key objectives should incorporate a clear focus upon the important role that sustainable waste management should play in contributing towards this important national, regional and local objective through the prudent use of resources and the timely provision of new waste management facilities of the right type, at the right time.</p> <p>There will be an ever increasing need for local energy generation around the County to meet the needs of residents of Warwickshire. Waste facilities can provide additional generation capacity around the region. Therefore the key objectives should also consider the guidance in PPS 22 Renewable Energy which acknowledges that positive planning which facilitates renewable energy developments can contribute to all four elements of the Government's sustainable development strategy:</p> <ul style="list-style-type: none"> - social progress which recognises the needs of everyone - by contributing to the nation's energy needs, ensuring all homes are adequately and affordably heated; and providing new sources of energy in remote areas; - effective protection of the environment - by reductions in emissions of greenhouse gases and thereby reducing the potential for the environment to be affected by climate change; - prudent use of natural resources - by reducing the nation's reliance on 	<p>Adherence to the waste hierarchy will address matters of climate change.</p> <p>Your observations are noted</p>

ever diminishing supplies of fossil fuels; and,
- maintenance of high and stable levels of economic growth and employment - through the creation of jobs directly related to renewable energy developments, but also in the development of new technologies. In rural areas, renewable energy projects have the potential to play an increasingly important role in the diversification of rural economies.

In determining the provision of facilities for current and future requirements for Warwickshire, the County should use "operational capacity" rather than permitted capacity in determination when presenting the provision requirement for the "Treatment Gap" for the County. This can be used to measure whether the County is making an adequate or timely provision of waste management facilities for the County.

Objective 2 - neither waste nor energy policy places a rigid cap on the development of waste management capacity. The framework should pay greater regard to guidance within national energy policy which includes recovering energy from waste. There is no requirement to demonstrate a quantitative need at the local level given the step change required in waste management and in energy supply. Bringing forward planning applications, and constructing and operating facilities is a commercial matter for the industry, There is no requirement for 'need' to be determining factor in considering planning applications for new waste management facilities.

In monitoring the provision of facilities for current and future requirements for Warwickshire, the County should use "operational capacity" rather than permitted capacity in determination when presenting the provision requirement for the "Treatment Gap" for the County. This can be used to measure whether the County is making an adequate or timely provision of waste management facilities for the County.

Objective 3 - It is suggested that this should be worded "avoid, mitigate or compensate"

Objective 4 - It is suggested that the focus should not necessarily be upon 'precautionary' measures to affect climate change. This suggests a negative, preventative approach and does not pay regard to the significant positive impact that the timely delivery of sustainable waste management facilities within the county would have in terms of diverting waste from landfill and where appropriate using it as a resource by generation of energy.

Objective 6 - Sustainable transport is key in the development of any waste management facility and supports the importance of paying full regard to the concerns and interests of the local community. However different types facilities require different transport solutions, it is important that this is appropriately balanced against the need to ensure the prudent use of resources and the importance of the emerging policy to provide a framework that will the timely provision of new waste management facilities of the right type, at the right time in the most suitable location.

Objective 7 - The definition of inappropriate development is provided in PPG2 Green Belts rather than PPS 10. The objective to protect the openness of Green Belt is in accordance with PPG2 and is understandable in principle. However the objective should acknowledge more recent guidance within PPS 10 which recognises that the particular locational needs of some types of waste development and the wider environmental and economic benefits of sustainable waste management are material considerations that should be given weight in determining whether proposals are given permission. Large areas of the plan area are 'Green Belt and a 'blanket' style approach to preventing development in the green belt could severely impact upon the authorities ability to deliver

		<p>the timely provision of sustainable waste management facilities that will be required over the plan period of the right typo, at the right time in order to drive waste up the waste hierarchy and divert waste from landfill.</p> <p>Objective 8 - insert nearest "appropriate" installations.</p>	
Question 3	Observations	<p>Sustainable Waste Management Practices - Para 6.3 - this focusses upon the principles of self sufficiency, proximity and the waste hierarchy. The principle of promoting sustainable waste management to drive the treatment of waste up the waste hierarchy is supported in principle. It is considered that the key issues identified in the consultation document does not suitably consider the important role that recovery of waste should play in the sustainable management of waste within the county. National climate change and energy policy strongly support new renewable energy developments, including Energy from waste with the twin objectives of reducing carbon emissions and enhancing security of supply within the UK. This support should be echoed within the development plan, which should presume in favour of renewable energy development over landfilling, provided that it does not give rise to unacceptable environmental or transport impacts.</p> <p>The focus upon the principles of self sufficiency and proximity are too narrow . All waste arising, whether MSW, C&I waste, or any other waste stream, require management. Generally, it is impracticable for management to occur at the point of arising, and therefore, waste will need to be transported to recycling, composting, recovery or disposal facilities with available capacity. Without contractual constraints, albeit that these typically will operate to achieve the same effect, its destination will be determined according the following drivers. These are:</p> <ul style="list-style-type: none"> i. the distance travelled (predominantly the cost of haulage); ii. the cost of using that facility (the gate fee – which may also include landfill tax) 	<p>By referencing the waste hierarchy and the principles of self sufficiency and proximity we are replicating the high level principles that the Waste Framework Directive require</p>

iii. Operational and/or treatment constraints for processing or disposing of the waste.

The destination to which waste travels is determined by a combination of these drivers. A nearby facility may be used if the gate fee is attractive, or alternatively waste may travel greater distances if the gate fee or revenue is advantageous. A case in point is the transport of recyclables to the far east for reprocessing, which is driven by demand and the price that such a distant market is prepared to pay for this resource.

Waste tends to gravitate to the management route that offers the least overall cost for sound commercial reasons. The sustainability of the option has only a limited effect, largely achieved through market-based mechanisms such as the Landfill Tax, LATS and road fuel duty. In order to ensure that waste is managed acceptably close to the point of arising, an area defined for planning purposes must contain affordable facilities with sufficient capacity to accommodate management of the wastes concerned. To this end, European and national policy requires the waste planning authorities make provision for a network of installations such that the Community (Europe) might become self sufficient in waste management terms.

In July 2009, Defra published its first consultation document on implementation in Wales and in England of the 2008 WFD. In the consultation document, the Department states the 'resolution' at which the principle of self-sufficiency applies. "The UK has transposed and implemented the existing WFD on the basis that the requirement to establish an integrated and adequate network of disposal installations (the self-sufficiency principle) applies at the national level – i.e. at the Member State level. As matters stand, the UK is self-sufficient in waste disposal." There is no requirement for consideration of self-sufficiency at a subregional or local level. Warwickshire is not an island and is

extremely well connected by road and rail.

With regard to proximity, DEFRA's consultation document indicated that the principle is transposed in Wales and in England by means of Section 44A of the Environmental Protection Act 1990 and paragraphs 2 and 3 of Schedule 2A to the 1990 Act. . The consultation document states "In England, the spatial planning system also requires local authorities to plan for an adequate network of facilities for managing waste at all steps in the hierarchy. The proximity principle is recognised through an objective in guidance to waste planning authorities that they should provide a framework in which communities should take more responsibility for their own waste, and enable sufficient and timely provision of waste management facilities to meet the needs of their communities."

The obligation in the 2006 WFD (CD G7) is "...to enable waste to be disposed of in one of the nearest appropriate installations" text that is repeated in the fourth KPO of PPS 10, which requires all planning authorities to prepare and to deliver planning strategies that: "... help secure the recovery or disposal of waste without endangering human health and without harming the environment, and enable waste to be disposed of in one of the nearest appropriate installations;...". The text also appears in paragraph 3 of Schedule 2A of the Environmental Protection Act (Objectives for the purposes of the national waste strategy) Article 16, of the 2008 WFD extends the concept of the nearest appropriate facility to recovery, as well as disposal.

The draft Waste (England and Wales) Regulations 2011 are due to transpose the 2008 WFD into English law. With regard to proximity and self sufficiency, they state (at paragraph 4 (3) of Schedule 1 Part 1) "The network [of waste disposal installations and of installations for the recovery of mixed municipal waste] must enable waste to be disposed of

and mixed municipal waste collected from private households to be recovered in one of the nearest appropriate installations, by means of the most appropriate technologies, in order to ensure a high level of protection for the environment and human health.” This re-iterates the requirement for waste to travel to one of the nearest appropriate locations, but does not imply immediate proximity, or a need to manage wastes upon one’s own doorstep. It also refers to municipal waste, rather than C&I waste. Commercial drivers will act to constrain the distance waste travels to the a facility, whilst policy should recognises that waste does not recognise administrative boundaries and that, particularly in the case of recovery operations, there are benefits of scale that justify commercially determined catchment areas, rather than requiring, as a matter of principle, the management of waste close to its point of arising.

A waste management facility should be an ‘appropriate’ one, which implies careful consideration of other issues than distance, including, for example, environmental performance, deliverability and cost. If it is necessary for waste to be transported some distance before treatment and recovery, and if that is what the market offers, then this is not merely acceptable, it is desirable. Thus, policy recognises the reality that there are global markets for secondary materials, including biomass wastes, and the benefits of economies of scale in recovery processes. In practice, recycling is made possible in part because of exports of materials, and service providers offer efficient recovery of energy from waste in regional or sub-regional facilities.

These systems meet the needs of waste collection authorities, waste disposal authorities and business. In this context, the transport distances associated with transport within the sub-region are minor and should not form the focus for consideration of applications for sustainable waste management facilities. The key issue should not be based purely on theoretical transport distances and Warwickshire's needs in isolation. It

		<p>should take into account wider sustainability issues, associated with landfill avoidance, energy recovery through delivery of CHP and economy of scale.</p> <p>Waste Management Location Options para 6.9 - It is not always appropriate to locate waste management facilities in and around urban locations due to local stakeholder concerns, operational management requirements or best practice guidance.</p>	
Question 4	Observations	<p>The key issues should place a greater emphasis and acknowledgement of the important role that the recovery of waste can play in the delivery of a low carbon energy supply.</p> <p>The need for renewable and low-carbon energy supply systems, nationally and locally, is urgent. The need for new waste management infrastructure, is equally pressing. The potential to deliver renewable heat and power, whilst diverting considerable quantities of residual waste from landfill, marks the essence of what is sought by national energy and waste policy.</p> <p>Climate change is the Government's principal concern with respect to sustainability. The PPS 1 Supplement on Climate Change states that "The Government believes that climate change is the greatest long-term challenge facing the world today. Addressing climate change is therefore the Government's principal concern for sustainable development." Recognising this priority, in the agreement between the Conservative and Liberal Democrat parties, the Coalition states its intention that "... we will seek to increase the target for energy from renewable sources, subject to the advice of the Climate Change Committee..." and that "... we will create a presumption in favour of sustainable development in the planning system" .</p> <p>Inclusion within to state that the WPA recognise that is it not always</p>	Noted

		appropriate to locate waste management facilities in and around urban areas. Other factors such as local stakeholder, operational management, or best practice requirements will also drive the appropriate location of facilities.	
Question 5	Observations	The provision of sufficient waste management facilities in Warwickshire to treat an equivalent amount of waste that is produced and the recognition of cross boundary movements is supported in principle. However, the policy principle focuses too heavily upon the principle of proximity in isolation from the other factors that contribute towards ensuring the delivery of sustainable waste management facilities. A waste management facility should be an 'appropriate' one, which implies careful consideration of other issues than distance, including, for example, environmental performance, deliverability and cost. If it is necessary for waste to be transported some distance before treatment and recovery, and if that is what the market offers, then this is not merely acceptable, it is desirable.	Clearly these are matters for the market to decide with the WDF providing the framework on which such decisions can be based
Question 6	Observations	The development of a locational strategy is supported in principle and further consultation on this is welcomed. This strategy needs to provide suitable flexibility to allow industry to bring forward appropriate sites for waste management facilities that contribute towards the sustainable management of waste without undue harm to the environment as detailed above.	Flexibility is key to delivery and will be reflected in the locational approach adopted
Question 7	Observations	Detailing the criteria that strategic sites within the core strategy is not appropriate and not necessary as discussed at the recent Warwickshire Waste Core Strategy discussion. It will restrict the flexibility of the strategy and contradicts the spirit of the Localism Bill which is due to be ratified. There is no advantage identifying strategic sites for future applications. Strategic waste management facilities as well as other facilities not meeting the criteria should all be at an 'appropriate' location, which implies careful consideration of other issues than distance, including, for example, impacts upon amenity, environmental	Noted

		performance, deliverability and cost. If it is necessary for waste to be transported some distance before treatment and recovery, and if that is what the market can offer, then this is not merely acceptable, it is desirable.	
Question 8	Observations	<p>The need to provide additional waste management facilities to provide additional treatment capacity is supported in principle. The Core Strategy should seek to ensure that , as a minimum, there is sufficient provision for the county to meet the treatment gap. However this should not be seen as a 'cap' upon capacity as neither waste nor energy policy places a rigid cap on the development of waste management capacity.</p> <p>As previously detailed above the Treatment Gap should be measured on existing operational facilities rather than permitted facilities.</p>	Noted and agreed
Question 9	Observations	The policy should make due regard to the role that 'recovery' and renewable energy generation can play in not only providing facilities to meet the treatment gap but also in providing a source of renewable energy which is vital to facilitating the delivery of the Government's commitments on climate change and as detailed in the Waste Hierarchy.	Noted
Question 10	Observations	The policy should make due regard to the role that 'recovery' and renewable energy generation can play in not only providing facilities to meet the treatment gap but also in providing a source of renewable energy which is vital to facilitating the delivery of the Government's commitments on climate change and as detailed in the Waste Hierarchy.	Noted
Question 11	Observations	As detailed previously, "at the nearest appropriate facility" should be included.	Re-wording agreed
Question 12	Observations	Hazardous and stable non-reactive hazardous waste are treated and disposed of in a different processes and facilities. Therefore the wording of the policy wording is confusing. Suggested rewording: "A Policy Principal is required that encourages the treatment of hazardous waste where possible. However given that a large proportion of hazardous	Your comment is noted but whether the hazardous waste is stable or not it is still classed as hazardous waste and there is no sub division as your response suggests

		waste cannot be fully treated, Warwickshire should also plan for the final disposal of such waste. A provision for stable non-reactive hazardous waste can be	
Question 14	Observations	<p>The safeguarding of existing waste sites is supported in principle. Auxiliary activities and alternative treatment operations within existing waste sites, which serve to drive the treatment of waste up the Waste Hierarchy and divert waste from landfill should also be supported, where it can be demonstrated that there would be no unacceptable harm to the environment.</p> <p>Auxiliary or other waste activities which run alongside an existing waste facility often cannot be commercially viable or sustainable in terms of property, planning and/or site management issues without or disconnected from the operational main waste operation. Co-location of waste operations should be promoted within the context of this section.</p>	Noted
Question 15	Observations	The provision of landfill capacity is a necessary requirement for waste management in the county. The policy and wider WDF should ensure that the provision of landfill capacity, where a need is demonstrated, is provided in a timely manner and should recognise the operational and commercial implications that are involved in terms of the time taken for development, consent, engineering and ultimately make it available to the market. The time period for expediting can vary depending on the requirements of the project however a guideline of 7 years should be considered for undertaking. Operational capacity vs. approved fill or site life should be assessed as part of continued monitoring within plan to ensure adequate capacity within the County.	The Policy Principle as written recognises the possibility of additional landfill capacity where need can be demonstrated which is in line with your response
Question 16	Observations	Protection of the natural and built environment from unacceptable impact is supported. The policy should ensure that waste management facilities are designed and operated appropriately and at a standard which ensures there are no unacceptable impacts upon the environment. Operation of waste management facilities is controlled by the	As you quite rightly point out operational matters are dealt with through environmental permitting and are not a matter for this Core Stratagey

		Environment Permitting regime. The use of the term ' highest standard' of operational practice and 'designed to the highest possible standard' are phrases that offer no criteria against which to base such an assessment. It is considered that this policy should be re-worded accordingly.	
Question 17	Observations	Agree, as detailed above the detail of how the plan is monitored should be consulted so as to ensure data retrieved is useful and well meaning.	Noted
Question 18	Observations	Of the five options, option 4 allows greater flexibility in the potential location of waste management sites within the county. The greater flexibility will allow industry to bring forward sites, or new treatment facilities at existing waste management sites, that should assist in the timely provision of new waste management facilities of the right type, at the right time at the most appropriate location. Strategic waste management facilities should be at an 'appropriate' location, which implies careful consideration of other issues than distance and proximity to waste arisings including, for example, impacts upon amenity, environmental performance, deliverability and cost. If it is necessary for waste to be transported some distance before treatment and recovery, and if that is what the market can offer, then this is not merely acceptable, it is desirable.	Noted and recognised that flexibility is key to delivery

Representor : 1205 Rob Hastie

Heading	Nature of Response	Response / Representation	Officer comments
Question 2	Support		Noted
Question 3	Support		Noted
Question 4	Observations	The need to provide reasonably accessible community waste recycling facilities even in remoter rural areas, in order to avoid creating a substantial fly-tipping risk.	Noted. Community waste recycling facilities would come under the remit of the County's Municipal Waste Management Strategy (MWMS), although the Waste Core

		The need to cooperate with adjacent Local Government Authorities over cross border use of facilities.	Strategy must align with the plans and proposals in the MWMS.
Questions 5 -17	Support		Noted
Question 18	Observations	<p>A) Preferred Spatial Option: 5</p> <p>It is the option which most closely meets the concerns re fly tipping in rural areas referred to Q4 above. It needs expansion - perhaps by adding elements of option 2 in appropriate areas.</p> <p>There is no mopping of waste disposal/recycling facilities in adjacent Counties which may be close to county boundary lines and provide a facility for Warwickshire residents. Again see Q4 above.</p> <p>B) See above.</p>	Comments noted. We agree that indicating waste management facilities within proximity of the County may help in supplementing the waste management context section. There will be further work undertaken on this.

Representor : 1206 Mr M Dittman (North Warwickshire Borough Council)

Heading	Nature of Response	Response / Representation	Officer comments
Question 1	Support	Yes - no amendments.	Noted
Question 2	Support	Yes - However, reference to "regional guidance" may need to be deleted following abolition of RSS.	Noted and to be amended accordingly
Question	Support	Yes - NWBC would stress the need for adopting a flexible	Noted

3		approach where sites are not practical, viable or available for all waste types in all circumstances. No further comment.	
Question 4	Observations	The issue of the principle of proximity to reduce distances for the transportation of waste (para 6.3) should not be at the expense of rural character and environmental impacts. Some of the sites in Spatial Options outside development boundaries, in rural locations are on lower classification rural routes/lanes and new or expansion proposals on such sites would not be supported by the Borough Council. This should be clarified or stated explicitly in the document.	Noted. It is intended that the next consultation document will include policies that require waste management facilities to be well located to sources of waste, are well located to the strategic transport infrastructure and do not have adverse impacts on the natural and built environment or communities.
Question 5	Support	Yes - in broad terms subject to points raised elsewhere. No further comments.	Noted
Question 6	Support	Yes - In broad terms subject to points raised elsewhere. To enable appropriate assessment and consideration of consultation responses. No further comments.	Noted
Question 7	Support with conditions	Yes - However, consideration should be taken of waste management sites/facilities adjoining and outside the County Boundary that could deliver the waste management needs of settlements and industrial estates in the County, reflecting the proximity principle. This should be reflected in the document. Similarly opportunities of re-using waste for energy generation are also not explicitly mentioned or encouraged.	Comments noted, however in managing waste in accordance with the principles of the Waste Hierarchy, the re-use or recycling of waste is preferred. It is intended that in seeking to discourage the disposal of waste to landfill, proposals for other types of recovery, i.e. anaerobic digestion, mechanical-biological treatment and other energy/value recovery technologies will be encouraged, provided that energy and/or value recovery by-products are maximised and residues are satisfactorily managed and disposed of.
Question 8	Support	Yes - This reflects the evidence currently available.	Noted
Question 9	Support	Yes - to reflect the requirements of the Waste Hierarchy and recycling targets.	Noted

Question 10	Support	Yes - reflects the evidence currently available.	Noted
Question 11	Support	Yes - but opportunities of re-using waste for energy generation is not explicitly mentioned or encouraged.	See response to Q7.
Question 12	Support	Yes - a flexible approach is necessary and the availability of any hazardous waste treatment facilities in reasonably close proximity to the County (regional and sub-regional facilities) should be included as part of the strategy considerations.	Noted
Question 13	Support	Yes - to reflect the proximity principle and encourage re-use and recycling. But opportunities of re-using waste for energy generation is not explicitly mentioned or encouraged.	See response to Q7.
Question 14	Support	Agreed - to ensure continued efficient use, maintenance and viability of existing facilities.	Noted
Question 15	Support	Yes - to reflect current evidence on capacity and the need to provide sufficient facilities throughout the County to comply/accord with the proximity principle.	Noted
Question 16	Support	Yes - additional/strengthened consideration is needed to minimise facilities impact on landscape and countryside character.	Noted. It is anticipated that there will be a policy included in the next consultation document stating that new waste developments must protect, and where possible enhance, the natural and built environment by ensuring that there are no unacceptable adverse impacts upon the quality and character of the landscape.
Question 17	Support	Yes - no further comments.	Noted
Question 18	Observations	The Policy Principles and Options should seek to ensure that any new Industrial/Commercial Estates (of appropriate size/threshold) automatically include an appropriately sized on-site waste management facility to cater for their own waste	

	<p>and provide or encourage opportunity for energy generation. This will help ensure the sites are sustainable in terms of the County and Borough's Core Strategies.</p> <p>Some of the existing sites identified in the Spatial Options, outside settlement development boundaries, are in rural locations, on lower classification rural routes/lanes. The development of new or expansion proposals on such sites would not be supported by the Borough Council. Restriction/Constraints over development on such sites should be clarified or stated explicitly in the document in terms of no adverse environmental or visual landscape impact (along lines of a strengthened point iii) in Option 5).</p> <p>There appears to be either a clarification or correction needed in Options 4 and 5 as to what settlements are affected and referred to in the options. Option 4 lists those settlements over 6000 and identifies them on the Key Diagram. Option 5 appears to use the same 6000 population criteria for the "Secondary Settlements" referred to but does not list them on the option text or indicate them on the Option Key diagram. The relevant settlements should be identified in both text and diagram.</p> <p>Existing industrial estates/sites may provide opportunities for new (or for improving existing) waste facilities to address waste generated on existing sites (particularly via vacant plots/units within them). The opportunities for re-using these waste management facilities for energy generation should also be included and/or encouraged. However, it is important to stress and ensure that new waste management facilities on existing industrial estates should be employment generating</p>	<p>Noted – see response to Q4.</p> <p>Footnotes xv and xvi clarify how the 'primary' and 'secondary' settlements have been defined.</p> <p>Noted, however the Constraints Map on page 18 provides an indication of potential constraints for new</p>
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	<p>before support is forthcoming.</p> <p>None of the proposed options make explicit the implications of National environmental and planning policy designations (e.g. Green Belt), constraints that will limit the potential of many sites identified in the options. This may be helpful in spatial terms to focus/identify where the greatest pressure for new or expanded sites is likely to/can be accommodated.</p> <p>In applying the proximity principle the Core Strategy fails to indicate or take into account the presence of major urban areas immediately adjoining the County Boundary , including Tamworth, Solihull and Coventry. The availability and accessibility of waste management/disposal facilities that could contribute to serving/managing the needs of Warwickshire settlements should be noted. Arbitrary political and administrative boundaries should not prevent access to and use of facilities and joint cross border, partnership management of waste should be applied in such circumstances.</p> <p>Option 1 - This option may have some adverse implications for North Warwickshire due to the presence of a number of fairly rurally located industrial employment sites and ex industrial Brownfield sites. Although the proximity principle should normally apply the dispersed rural nature of such sites may mean new waste management facilities are inappropriately located and may have adverse impacts on traffic generation/travel distances and adverse impacts on the rural landscape and countryside character.</p> <p>Option 2 - Noting comments as for option 1. Supported only if</p>	<p>waste development as set out in PPS10.</p> <p>The major urban areas outside Warwickshire are depicted in Fig. 3.1 on page 13 of the document. However, we agree that current flows of waste into and out of the County may help to supplement the waste management context section. Further work will be undertaken on this prior to consultation on the next stage.</p>
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it includes a rationalisation and review of existing waste management sites and their existing waste processes to help assess their suitability for new development or extended services. This will ensure they are appropriate to the location and nature of the waste generated and dealt with locally. Expansion of very rural sites along rural access routes should be discouraged/opposed.

Option 3 - Not supported. Noted that it accords with the proximity principle, locating facilities within settlements and near main waste generators. However, availability of suitable sites within these settlements boundaries and will be extremely limited, as is evidenced by the lack of current site opportunities identified in emerging Borough and District Core strategies. Competing land uses and potential adverse impacts from existing adjoining development and land uses will constrain the potential for developing new waste management facilities and sites.

Option 4 - Although it accords with the proximity principle, locating facilities closest to main waste generators, the difficulties created by competing land uses are added to by the lack of definition of the term "in close proximity". It may enable waste management facilities/services to be better integrated with new development proposals (and hence sites and sources of waste generation) emerging through the LDF Development Plan process but there are concerns it may enable inappropriately located sites with poor infrastructure and access to come forward.

Option 5 - Although relating well to those settlements likely to generate greatest levels of waste the restriction of only

		<p>locating facilities within or in close proximity to the primary settlements may restrict access to and opportunity of delivering sufficient sited waste management facilities in other significant settlements North Warwickshire Borough. The Borough has no "Primary settlements" within its boundary and only 2 "Secondary Settlements" at Atherstone and Coleshill are explicitly identified (see general point above). This may encourage additional, unnecessary and adverse levels of traffic generation.</p> <p>Alternative option approach:</p> <p>To discourage inappropriate development within the Green Belt and unsustainable rural locations in the Borough, a hybrid Option 4 or 5 including elements of Option 2 (Develop new facilities County wide on existing waste management facilities only where appropriate in size, location and environment impact)? may be more relevant and appropriate. This issue may already be accommodated by the term "or in close proximity" but clarification and definition of the term is required.</p>	
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Representor : 1207 Rohan Torkildsen (English Heritage)

Heading	Nature of Response	Response / Representation	Officer comments
2 Policy Context	Observations	The discussion options document and emerging strategy appears to have sufficient broad safeguards to ensure consideration is given to the significance of heritage and landscape sensitivities. However great care should be taken when determining your preferred spatial strategy to	Noted. It is expected that there will be a policy in the Waste Core Strategy that new waste developments must protect, and where possible enhance, the natural and built environment by ensuring that there are no unacceptable adverse impacts upon archaeology, the

		avoid any over commitment to specific sites prior to a more detailed process of site impact assessment that will no doubt have to be undertaken when one appreciates the scale and location of particular waste facilities.	quality and character is the landscape and the distinctive character and setting of the County's settlements. The WCS will also request that new waste proposals will be informed by the HLC, as well as any other relevant landscape assessments or guidelines for the County.
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Representor : 1208 Richard Wheat (Warwickshire Wildlife Trust)

Heading	Nature of Response	Response / Representation	Officer comments
4 Waste Management Context	Observations	It is disappointing to see that, despite their acknowledgement in paragraph 3.16 of the county's environmental portrait, Local Wildlife Sites (LWS) or Local Nature Reserves (LNR) are not included within the constraints map in fig 3.3. LNR's are statutory sites as designated under Section 21 of the National Parks and Access to the Countryside Act 1949 and so should be considered as a statutory constraint. LWS's are non statutory sites but play a fundamental role in conserving some of the county's best wildlife habitats and species, including Local Biodiversity Action Plan (LBAP) priorities. Given the local authority's commitment to protect and enhance LBAP habitats and species, as specified in paragraph 3.18, it is recommended that LWS's are also included within the constraints map.	
Question 1	Observations	The Core Strategy Vision does not provide a strong context for the protection and enhancement of biodiversity in subsequent objectives or policies. Instead the vision refers to the protection of the county's rural characteristics; undermining comprehensive protection for the natural environment and biodiversity which is intrinsic to both rural and urban areas. It is the Trusts view that the rural characteristics of the county are underpinned by its rich natural and historic environment and so the vision should be amended to reflect this. For example "All appropriate measures will be taken to protect and conserve Warwickshire's Natural and Historic Environment as well..."	Comments noted and vision statement to be changed accordingly
Question 2	Observations	The Trust welcomes the inclusion of a specific objective to protect and enhance the	

		natural environment. The recommended amendment above provides context for this objective. We specifically welcome the avoid, mitigate and compensate hierarchy detailed within the objective which is deemed to be consistent with the principles of Planning Policy Statement 9.	
Question 4	Observations	<p>Para 6.9 Waste Management Location Options</p> <p>Whilst the Trust welcomes the intention to focus waste management sites close to where the most waste is produced, it is essential that this is only considered where there is sufficient capacity to do so. Siting a Waste Management site in an urban location that requires the loss or degradation of a key biodiversity or natural environmental asset would contradict efforts to reduce the overall impact on the environment. The use of a robust and up-to-date environmental evidence base to inform spatial options should be considered a necessity from the outset to inform whether urban environments can provide sufficient capacity without unacceptable loss or degradation of biodiversity or natural environmental assets.</p> <p>Para 6.12 Protection of Environmental Resources</p> <p>The Trust agrees with and supports this paragraph, recognising that the Core Strategy will need to ensure sufficient protection for statutory sites. The Trust would also like to see a similar commitment to protect and enhance non-statutory sites in accordance with the county council's objectives to support LBAP objectives. The Trust subsequently promotes statements that provide protection and enhancement for non -statutory sites in accordance with the county council's objectives to support LBAP objectives. The Trust subsequently promotes statements that provide protection and enhancement for non-statutory sites or at the very least ensuring that there is no net loss of Local Wildlife Sites and Local Biodiversity Action Plan Habitats or species within the scope of the Core Strategy.</p> <p>Site Decommissioning</p> <p>The Trust would welcome a policy that provides a strategic approach to the</p>	

		decommissioning of waste management sites. We advocate that existing or future objectives for wider landscape conservation efforts, such as those recognised within the West Midlands Biodiversity Enhancement Areas or within Green Infrastructure Strategies, are considered within the scope of decommissioning sites; recognising the contribution these sites may have in delivering these aims.	
Question 7	Observations	A strategic waste management site should not result in the loss or degradation of key biodiversity or natural environmental assets. In accordance with PPS 9, sites that result in a net loss of biodiversity should not be considered as strategic option. This point needs to be incorporated into policy principle 3.	
Question 16	Observations	The Trust welcomes policy principle 12 and the associated text (para's 7.20 and 7.21) and fully supports the reference to protecting recognised sites of International, national, regional and local importance. Furthermore, we note that the strategy will seek well designed facilities that contribute positively to the character of the area in accordance with PPS10. This focus on securing environmental or other improvements should be encapsulated within the policy text itself by stating that "The Core Strategy will protect and enhance the local environment...". Providing a context for how these improvements will be sought within the text would also be welcomed; taking into account existing local environmental objectives, such as those listed within the LBAP or district green infrastructure strategies.	
Question 17	Observations	The Trust supports a policy requiring the monitoring and enforcement of waste policies and planning applications. Considering the inclusion of a policy that requires the protection and enhancement of sites, habitats and species of biodiversity importance, it is strongly advised that a suitable monitoring provision for biodiversity is included within this policy.	
Question 18	Observations	Given the absence of supporting environmental information, it is not possible to provide detailed comments on each spatial option at this stage. However, I wish to reiterate my comments above regarding the need for a robust and up-to-date environmental evidence base to support spatial options, in accordance with PPS12. The Habitat Biodiversity Audit (HBA) data provides a comprehensive and regularly up dated evidence base of all LWS, potential LWS (pLWS) and habitats throughout	

		<p>Warwickshire and so should be referred to at the earliest possible stage to avoid impacts on statutory or non-statutory sites. Moreover, a species data search from the Warwickshire Biological Records Centre should also be included within the evidence base and fed into the Sustainability Appraisal process so that the spatial options can take full account of their impact on biodiversity.</p> <p>The Trust has a presumption against any spatial option that would result in a negative impact on biodiversity. We would therefore wish to see a preferred option that could accommodate waste management close to where the waste is produced whilst demonstrating a neutral - positive impact on biodiversity. It is advised that information on the biodiversity constraints and opportunities of each spatial option is adequately detailed within the Sustainability Appraisal, so that conclusions as to the most suitable option against reasonable alternatives can be assessed during the preferred option consultation stage.</p>	
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Appendix F: List of consultees in PPS12

Regulatory Agencies: The Environment Agency, English Heritage, Natural England

Physical Infrastructure Delivery Agencies: Highways Authority, Highways Agency, Utilities Companies, Network Rail, Public Transport Providers, Airport Operators

Social Infrastructure Delivery Agencies: Local Authority Education Department, Social Services, Primary Care Trust, Acute Hospital Trusts, Strategic Health Authority, the Police Charities/NGOs.

Major Landowners: Including the Local Authority itself and Government Departments and Agencies

Housebuilders, The New Homes Agency and Other Developers

Minerals and waste management industries