



Warwickshire Waste Partnership



Warwickshire Waste Partnership Joint Municipal Waste Management Strategy Refresh 2013-2020

SEA Screening Statement of Determination

21st November 2013

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Contents

Contents	i
1 Introduction	1
1.1 This document.....	1
1.2 The Warwickshire Waste Partnership	1
1.3 The WWP waste strategy and SEA screening process	1
1.4 Description of strategy context.....	2
1.5 SEA regulations and requirements.....	4
2 The SEA screening process	5
2.1 Description of the SEA screening process	5
2.2 Comparison of existing and refreshed strategies	6
2.3 Screening report and consultation process	6
3 Determination of significance	8
4 Summary of strategy changes and environmental effects	13
5 Record of responses received from screening consultation process.....	16
5.1 Responses received from statutory consultees	16
5.2 Responses received from neighbouring local authorities.....	17
5.3 Responses received from the public	17
6 SEA screening determination	18
Appendix A – Detailed summary of aims and objectives comparison of existing and draft refreshed strategy	19
Appendix B – Review of 2013 Strategy Refresh Implementation Plan	33
Appendix C – Consultation response from Natural England	35
Appendix D – Consultation response from the Environment Agency.....	36
 Figure 1: Map of Warwickshire Waste Partnership area including principal settlements	 2
Figure 2: Application of the SEA Directive to plans and programmes.....	5
 Table 1: Consideration of significant environmental effects of strategy refresh using Schedule 1 of the SEA Directive.....	 8
Table 2: Comparison of 2005 Strategy Objectives, Targets and Indicators with 2013 Strategy Refresh Objectives, Targets and Indicators	21
Table 3: Incorporation of 2005 Strategy 'Strategic Goals' into 2013 Strategy Refresh	31
Table 4: Incorporation of 2005 Strategy 'Best Practicable Environmental Option assessment Goals' into 2013 Strategy Refresh	32
Table 5: 2013 Strategy Refresh Implementation Plan Actions and Relevance to the Strategy Objectives	33

1 Introduction

1.1 This document

This document forms the SEA screening statement of determination for the refresh of the Warwickshire Waste Partnership Joint Municipal Waste Management Strategy ('the Strategy').

1.2 The Warwickshire Waste Partnership

The Warwickshire Waste Partnership (WWP) was formed in 2005 as a body representing all local authorities in Warwickshire. These consist of Warwickshire County Council, as the waste planning and waste disposal authority (WDA), and the five Borough and District Councils responsible for waste collection issues. The waste collection authorities (WCA) are North Warwickshire Borough Council, Nuneaton and Bedworth Borough Council, Rugby Borough Council, Stratford-on-Avon District Council and Warwick District Council.

1.3 The WWP waste strategy and SEA screening process

The screening process for the refreshed Strategy was undertaken by Frith Resource Management (FRM) on behalf of the Warwickshire Waste Partnership. It involves a five week consultation period with statutory consultees (English Heritage, Natural England & the Environment Agency), and the findings are included within this report.

The existing Strategy was adopted in 2005, published in January 2006 and sets out how the WWP seeks to manage their waste until 2020. It was not accompanied by a Strategic Environmental Assessment (SEA) because the strategy development and adoption dates fell before the dates set by the EU SEA Directive (*Directive 2001/42/EC*) and the subsequent national SEA Regulations (*The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004 No. 1633)*). A Best Practical Environmental Option (BPEO) study was conducted in accordance with prevailing guidance at the time.

It was felt that whilst the objectives and measures within the existing 2005 Strategy remained relevant, in a contemporary context there would be benefit from a refresh/update to bring key aspects of the documentation up-to-date, to reflect the advances in performance with regards to waste management services by all constituent WCAs, and the national/international legislation/policy context of the document.

It is in the context of this refresh/update that this SEA screening and determination process has been undertaken and this report summarises that exercise, concluding that there is **no significant environmental impact** from the refresh to the Strategy and determining that a **full SEA is not required**. The refreshed strategy does not constitute a full review of the waste strategy and any modifications to the 2005 strategy are discussed in this report.

1.4 Description of strategy context

The WWP is responsible for waste collection, treatment and disposal within the current county of Warwickshire. This covers a population of 546,600¹ residents in 240,530 households, with an expected population increase of 8% over the remaining strategy period. Warwickshire covers 763 square miles and is bordered by the counties of Staffordshire, Leicestershire, Northamptonshire, Oxfordshire, Gloucestershire, Worcestershire and West Midlands (clockwise from North). The area covered by the WWP is illustrated in Figure 1.

Figure 1: Map of Warwickshire Waste Partnership area including principal settlements and highways



Municipal waste arisings in the county totalled 270,171 tonnes in 2012/13 including waste presented at Household Waste Recycling Centres (HWRCs). All WCAs in Warwickshire offer collections of residual waste, dry mixed recycling, food and garden waste streams. Clinical waste and bulky waste

¹ 2012 UK population estimates.

collections are also offered on request. For 2005/06, when the strategy was adopted, the Warwickshire councils achieved a recycling and composting rate of 29.9%. This has risen to 52.2% for 2012/13, with increases in all years except between 2010/11 and 2011/12.

Warwickshire County Council operates nine HWRCs which have demonstrated an increased recycling rate over the strategy period to date, with current performance (2012/13) at 56%. Two of the HWRCs are operated in partnership with neighbouring authorities to reflect the demographic composition of their users. Bring sites are operated by the WCAs to supplement the HWRCs, however are becoming a less essential service as improvements to the kerbside recycling scheme have been implemented and uptake of these schemes has increased. In line with national trends, fly-tipping incidents are decreasing across Warwickshire, with 479 incidents reported in 2011/12.

Residual waste is currently disposed of to landfill; however, from December 2013, the Four Ashes Energy from Waste (EfW) facility will treat waste from North Warwickshire and Nuneaton and Bedworth Borough Councils. The WWP is currently investigating methods of residual waste treatment for the remaining three WCAs, with a procurement decision expected in the spring of 2014.

The WWP produced a waste minimisation strategy which was adopted in 2007 covering the period to 2015. This sets out to achieve a '*10% reduction in waste growth over the next eight years*'.

A number of waste partnerships and bodies operate in the counties surrounding Warwickshire. All of these have adopted waste strategies:

- The *Staffordshire and Stoke on Trent Joint Municipal Waste Management Strategy* was adopted in 2007 and is currently in the process of a 'refresh'.
- The *Leicestershire Municipal Waste Management Strategy* was adopted in 2004 and updated in 2011.
- The *Northamptonshire Joint Municipal Waste Management Strategy* was adopted in 2008 and fully reviewed in 2012.
- The *Oxfordshire Joint Municipal Waste Management Strategy* was adopted in 2007 and fully reviewed in 2013.
- The *Gloucestershire Joint Municipal Waste Management Strategy* was adopted in 2008.
- The *Joint Municipal Waste Management Strategy for Herefordshire and Worcestershire* was adopted in 2004 and fully reviewed in 2011.
- The *Waste management Strategy for Solihull* was adopted in 2010.
- The *Coventry Municipal Waste Strategy* was adopted in 2008.
- The *Birmingham Municipal Waste Management Strategy* was adopted in 2006.

1.5 SEA regulations and requirements

A municipal waste management strategy is usually subject to a Strategic Environmental Assessment (SEA), as prescribed by the SEA regulations². A full SEA of the strategy is only required if the modification is likely to have 'significant environmental effects' as detailed in Regulation 9(3):

“Where the responsible authority determines that the plan, programme or modification is unlikely to have significant environmental effects (and, accordingly, does not require an environmental assessment), it shall prepare a statement of its reasons for the determination.”

After consideration of the draft changes to the current strategy, a five week consultation with the statutory consultees, a four week consultation with neighbouring local authorities on the draft refreshed strategy and a four week consultation with the public on the draft refreshed strategy objectives, it is believed by the Warwickshire Waste Partnership that the Strategy refresh does not result in 'significant environmental effects', and therefore has produced this statement outlining the reasons for such a determination. This approach would mean no SEA is considered necessary for the refreshed Strategy.

² The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633).

2.2 Comparison of existing and refreshed strategies

The existing (2005) waste strategy did not include an SEA as it was initiated and adopted before the requirements to do so⁴. In line with regulation 9(1) of the SEA Regulations an SEA will only be required if there are deemed significant environmental effects associated with modifications of the waste strategy. Therefore, the first stage of the screening process required a desk based comparison of the existing (2005) strategy and the draft refreshed (2013) strategy aims and objectives to determine any substantive differences as regards the content of the two documents. The comparison exercise highlighted key areas where differences were identified (these are covered in more detail by Section 4 and Appendix A of this report):

- The **structure of the strategy** has been altered significantly in order to increase its accessibility and readability. Similarly, the introduction to current services, policy context and geographic statistics has been updated to reflect the current situation. The strategy refresh considers each objective of the previous strategy document, its relevance in the current context and whether it has been achieved to a satisfactory extent. As part of the restructure of the strategy document, a new implementation plan covering the strategy aims, objectives, targets and actions has been produced. For the purpose of comparison, and to demonstrate that all objectives, targets and actions from the existing strategy are covered by the refreshed draft strategy, Appendix A illustrates how each of the existing targets has been incorporated within the new objectives, targets and action plan.
- A number of changes were identified which relate to **updated targets** which have been modified to reflect the temporal (8 year) progression of legislation, government policy and partnership structure since the 2005 strategy was implemented. Similarly some targets have been removed, specifically, the original strategy contained targets for landfill diversion linked to the WET Act 2003⁵.

A more detailed summary of the comparison of objectives etc. between the 2005 and 2013 strategies is included in Appendix A.

2.3 Screening report and consultation process

Following a comparison exercise between the original strategy and draft refreshed strategy a screening report was produced as the next element of the SEA process. This was presented to the statutory consultees on 15th October 2013, and 5 weeks were allowed, as is standard practice, for responses to be received. Alongside the statutory consultation process a copy of the draft strategy

⁴ A Best Practicable Environmental Option (BPEO) study was under taken in accordance with prevailing guidance at the time.

⁵ Waste and Emissions Trading Act 2003. Landfill diversion targets which formed part of this Act's requirements are no longer applicable.

was provided to all neighbouring waste disposal and waste collection and disposal authorities for their comments, as a best practice measure. Four weeks were allowed for responses from neighbouring authorities.

Receipt of responses from the statutory consultees (Environment Agency & Natural England - see Appendices C&D) indicated they believed there was no potential for a 'significant environmental effect' arising from the strategy amendments, which in turn required no further exploration through a full SEA. No responses were received from neighbouring authorities as part of the wider non-statutory consultation activities.

The final element of the SEA process, in this instance, is a statement of determination (this report) indicating that the SEA screening process has been conducted, in accordance with the SEA regulations and available guidance, and a determination has been made on the likely 'significant environmental effects' of changes made to the waste strategy.

3 Determination of significance

In accordance with Schedule 1 of the SEA Directive the likely significance of all changes to the strategy have been considered with the relevant criteria; and are presented in Table 1.

Table 1: Consideration of significant environmental effects of the strategy refresh using Schedule 1 of the SEA Directive

SEA Directive Schedule 1 Criteria	Details / Summary of Predicted Environmental Effects	Significant Environmental Effect Envisaged?
1. The characteristics of plans and programmes, having regard, in particular, to-		
(a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;	<p>The current Municipal Waste Strategy (2005) sets parameters for waste management projects up to 2020. The new strategy will maintain this timeframe, makes no alterations to the location or nature of potential facilities.</p> <p>The draft refreshed strategy prescribes no new preferred options for waste treatment, however continues the preference to continually monitor technological developments in the industry. This is therefore not considered to entail a significant environmental effect.</p>	NO
(b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;	<p>The waste strategy is a standalone plan for all members of the partnership. It is complementary to other environmental plans, for example the Warwickshire County Council Environmental Sustainability Policy 2007. It is the lowest level of plan/programme in a hierarchy of plans adopted by the WWP partner authorities and therefore has limited direct influence over other plans and programmes. The waste strategy is influenced by a number of plans and programmes (from National Government).</p> <p>Other plans will have due regard to the Municipal Waste Strategy (e.g. Development Plan documents), however the refreshed strategy retains the same strategic directions as the existing strategy, and is therefore considered not to alter its influence over other plans/programmes thus is not considered to entail a significant environmental effect.</p>	NO

SEA Directive Schedule 1 Criteria	Details / Summary of Predicted Environmental Effects	Significant Environmental Effect Envisaged?
(c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;	<p>The WWP refreshed draft strategy, in line with its predecessor the 2005 strategy, will continue to sit alongside related strategies/policies of the member authorities with an environmental theme. The complementary policies vary on an authority by authority basis, but typically include sustainability, climate change topic areas.</p> <p>The refreshed strategy retains the same relationships as the previous strategy and is therefore not considered to entail a significant environmental effect.</p>	NO
(d) environmental problems relevant to the plan or programme;	<p>The draft refreshed strategy maintains all objectives relating to the minimisation and reduction of waste production, increasing of recycling and re-use, and treating waste in accordance with the waste hierarchy. Similarly, the strategy incorporates a carbon metric tool based target and maintains scope for efficiency improvements, for example through partnership working, as consideration of wider environmental problems. The objectives, targets and actions within the refreshed strategy were considered alongside the sustainability issues contained in other plans and programmes and are considered to be appropriate.</p> <p>The refreshed strategy is, for these reasons, not considered to entail a significant environmental effect.</p>	NO
(e) the relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).	<p>The strategy contains targets and objectives for recycling and landfill diversion matching or exceeding national and international targets. The strategy also contains objectives, targets and actions to facilitate treatment of waste in line with the waste hierarchy. The refreshed strategy retains consistency with the key aspects of the EU Waste Framework Directive and other waste management related Regulations and Directives.</p> <p>The refreshed strategy is, for these reasons, not considered to entail a significant environmental effect.</p>	NO

SEA Directive Schedule 1 Criteria	Details / Summary of Predicted Environmental Effects	Significant Environmental Effect Envisaged?
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to-		
(a) the probability, duration, frequency and reversibility of the effects;	<p>All changes to the strategy are designed to improve environmental protection / performance. The draft refreshed strategy therefore represents an improvement on the existing strategy.</p> <p>A number of the actions and targets proposed will deliver improved performance which is line with wider national targets. Promotional activities are short-term programmes to improve and maintain high levels of participation. Potential environmental effects are likely to be on a limited scale, and may be comparatively reversible in nature if found to impact negatively in any regard, e.g. littering etc.</p> <p>Specific environmental control over development will be addressed through the planning and environmental permitting regimes.</p>	NO
(b) the cumulative nature of the effects;	<p>As noted above, all changes to the strategy are designed to improve environmental protection/performance, and therefore there are no negative cumulative environmental effects envisaged for the strategy. The strategy is consistent with the waste hierarchy and therefore will promote that waste is treated increasingly in a more sustainable and environmentally friendly manner, meaning pollution and other negative environmental impacts are reduced over the life of the strategy.</p> <p>Specific environmental control over development will be addressed through the planning and environmental permitting regimes.</p>	NO

SEA Directive Schedule 1 Criteria	Details / Summary of Predicted Environmental Effects	Significant Environmental Effect Envisaged?
(c) the transboundary nature of the effects;	<p>Waste management activities include those which emit pollutants, which can contribute to transboundary effects, for example climate change. The current strategy promotes improvements to the treatment of all waste streams covered by the strategy, and the refreshed strategy will continue to pursue this objective.</p> <p>Currently, the large majority of treatment processes for the Warwickshire's waste are undertaken within or close to the partnership's geographical boundaries. This is unlikely to change within the strategy life due to the amount of treatment capacity in place or under construction, and therefore no additional environmental effects are envisaged. The refreshed strategy stipulates that changes in waste treatment should move waste up the Waste Hierarchy where possible, and therefore any potential effects of service changes will entail an environmental performance improvement.</p> <p>Specific environmental control over development will be addressed through the planning and environmental permitting regimes.</p>	NO
(d) the risks to human health or the environment (for example, due to accidents);	<p>There are no specific environmental problems identified from waste management activities currently under the existing strategy that have a significant impact on human health and the environment; however, waste management activities can contain polluting processes which could be considered environmentally damaging (e.g. emissions from transport) and include services which may have health and safety risks for operatives. Such uses are covered under environmental health, permitting and other legislation, and the modified strategy does not seek to introduce any further such environmental risks in service delivery or attainment of strategy objectives. One of the key strategy objectives is to reduce waste arisings overall, this reduces the materials handling that can give risk to potential health concerns.</p>	NO

SEA Directive Schedule 1 Criteria	Details / Summary of Predicted Environmental Effects	Significant Environmental Effect Envisaged?
(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);	The refreshed strategy seeks to modify the existing strategy to ensure all elements are current and relevant, and will not seek to expand current waste management operations in the area. Therefore, there are not considered to be any significant changes that will affect the spatial extent and magnitude of effects.	NO
(f) the value and vulnerability of the area likely to be affected due to- (i) special natural characteristics or cultural heritage; (ii) exceeded environmental quality standards or limit values; or (iii) intensive land-use;	The existing strategy was produced in light of the specific geographical sensitivities and vulnerabilities of the WWP area. The strategy is not site specific, however, and has been considered alongside sustainability issues as described previously in criteria 1(d). Furthermore, the strategy will not be altered to remove protection for any such areas, and therefore there are no significant environmental effects associated with the modified strategy.	NO
(g) the effects on areas or landscapes which have a recognised national, Community or international protection status.	As with criteria 2(f) the modified strategy will not remove any protection for areas with a recognised national, Community or international protection status. The modified strategy will continue to encourage improved environmental performance, and it is therefore considered that any environmental effects of the strategy, if any, will be of a positive and moderate nature.	NO

4 Summary of strategy changes and environmental effects

This section provides a more detailed analysis of the main strategy changes, modifications and updates between the existing 2005 strategy and draft refreshed 2013 strategy.

Strategy / implementation plan structure

The structure of the strategy has been altered significantly in order to increase its accessibility and readability. This has included updating background information about the WWP authorities and the current service provision. This is deemed to be a minor modification by the responsible authority (Warwickshire County Council after consultation with all other WWP members) and therefore have no significant environmental effects, and is one of the functions of a factual update.

Similarly, as part of the restructure of the strategy document, a new implementation plan covering the strategy objectives, targets and actions has been produced. The refreshed strategy implementation plan has resulted in a re-organisation of many actions, targets and objectives, however is considered by the WWP to encompass all of the existing objectives etc. of the current strategy. For the purpose of comparison, and to demonstrate that all objectives, targets and actions from the existing strategy are covered by the refreshed draft strategy, Appendix A illustrates how the existing targets have been incorporated within the new objectives, targets and action plan (Appendix B). For these reasons, it is considered by the WWP that the restructuring of the strategy has no significant environmental effects and only constitutes minor modifications.

Quantitative target updates

A number of changes were identified which relate to refreshed targets which have been modified to reflect the 8 year progression since the 2005 strategy was implemented. These changes reflect that the existing strategy was adopted in 2005 and is therefore out of date in these respects. The changes for the refreshed strategy all set higher environmental performance thresholds than their predecessors in the existing strategy; and, for these reasons, it is considered by the WWP that the restructuring of the strategy has no significant environmental effects and only constitutes minor modifications.

Carbon metric based emissions target update

The WWP have introduced a target and action for carbon emissions using the Defra produced Carbon Metric tool⁶. This will produce an environmental impact (in CO₂ equivalent emissions) for all

⁶ The first Carbon Metric for England was produced by Defra in November 2012 with the stated intent to make the tool, and associated report mechanism, available to local authorities through WasteDataFlow. It is expected to be available shortly for utilisation by local authorities, including those in the WWP.

waste operations of the WWP, including from transportation of waste. The target in the strategy refresh *‘Continually seek ways to reduce carbon emissions (including from transport) to lower the impact of the service on climate change as far as technically, environmentally and economically practicable’* replaces two previous targets concerning waste transportation distances and the use of ‘cleaner’ vehicle fuels. The new target has been introduced because it is more closely related to national policy and is a more sophisticated and robust method of measuring the climate change impacts of both the entire waste service and the transportation elements therein. The new target maintains the aim of previous targets to reduce emissions from waste transportation and related activities. It is therefore considered to be a minor modification to the strategy to bring it in line with current national thinking, and to have no significant environmental effects.

Updates to reflect changes to the WWP structure

The WWP has established a Memorandum of Understanding since the adoption of the original strategy in 2005. This has fulfilled the requirements of one indicator in the 2005 strategy. The partnership has also made the decision to work together on an informal basis. The 2005 strategy had an indicator intending to establish a more formal working relationship between members of the partnership. The WWP believe that as evidenced by the establishment of many successful partnership working initiatives in the strategy period to date that the chosen relationship has delivered, and will continue to deliver, the core objectives of the 2005 strategy; and that the chosen working relationship is therefore in line with the strategic goals, objectives and targets of the original strategy. Similarly, the original strategy referenced the Midland Recycling Consortium for two target indicators. The Midlands Recycling Consortium has been disbanded during the strategy period, and is therefore no longer an appropriate target for the strategy refresh.

In light of these developments the WWP has chosen to consolidate the previous joint/partnership working targets into a single, all-encompassing, target: *‘To work regionally and sub-regionally with appropriate stakeholders to improve value for money and service delivery’*. The new target encompasses the key themes of the previous targets, namely; continued partnership/joint working relationships; partnership on waste contract and purchasing arrangements where economically beneficial; working with external authorities as well as those in the WWP; and, the ultimate goals to improve service delivery, performance and value for money. For these reasons it is considered that the update was required to address background changes that have occurred during the strategy period to date; that the new target encompasses all key aspects of previous targets, where relevant; and that there will be no significant environmental effects as a result of this change.

Other temporal updates

Targets surrounding the operation, management and performance of HWRCs have been changed to reflect service delivery changes since 2005. The 2005 strategy had targets to improve and develop HWRC infrastructure so that more materials and higher quantities could be recycled; to implement a phased improvement plan for the HWRCs over five years; and to ensure that HWRC contracts operate on a penalty and bonus incentive scheme. The improvement plan has been implemented with improvements made to all HWRCs in the WWP area. Similarly, the majority of HWRCs are now

operated in-house by Warwickshire County Council and therefore the contract based incentive mechanism is no longer applicable. New material collections have been brought in across the HWRC service, and the 60% performance indicator set for the end of the strategy period has almost been achieved. In light of these service changes the WWP have consolidated HWRC targets into one with an aspirational performance target of 74%, representing a positive environmental change over the 2005 strategy. The new target aims to promote an 'effective' HWRC service and is therefore consistent with the ambitions of the previous 2005 strategy targets. For these reasons it is considered that the update was required to address background changes that have occurred during the strategy period to date; that the new target encompasses all key aspects of previous targets, where relevant; and that there will be no significant environmental effects as a result of this change.

5 Record of responses received from screening consultation process

The Warwickshire Waste Partnership considers that the Joint Municipal Waste Management Strategy refresh 2013 constitutes only ‘minor modifications’ to the existing 2005 strategy, and therefore a full SEA is not required. As part of the SEA screening process and strategy updating, views were sought from outside bodies, comprising the statutory consultees, the public and neighbouring local authorities.

5.1 Responses received from statutory consultees

Following consultation with English Heritage, the Environment Agency and Natural England between 15th October and 19th November 2013, two responses were received which concurred with the WWP’s view that no significant environmental effects are incurred from the strategy update, and therefore that a full SEA is not required. **Error! Reference source not found.**, overleaf, contains the points raised in the responses received from statutory consultees and any relevant actions taken by the WWP in response.

Table 2: Issues raised by consultees and actions taken by WWP

Consultee	Comment Raised	WWP Response / Action
Environment Agency	<i>“The Environment Agency considers that the environmental impacts of the revised strategy (and alternative options) will not be significantly different to those of the original, therefore we are content for you to rely on the original SEA.”</i>	No response required regarding determination of likelihood of no significant environmental effects. In the Screening Report the WWP clearly advised that due to the adoption date of the original strategy an SEA was not legally required, and instead a BPEO was produced as was standard practice at the time. See WWP response below as regards this point.
Natural England	<i>“Based on the information provided, Natural England is satisfied with the assessment of no significant environmental impacts from the refresh to the Strategy, with regards to our remit.”</i>	The WWP welcomes this assessment of no significant environmental effects. No further action required.

Consultee	Comment Raised	WWP Response / Action
Natural England	<i>“Considering that SEA has not been undertaken for the Strategy at any stage, the Partnership should seek their own legal guidance on the application of the SEA Directive and take into account the responses of other statutory consultees at the screening stage, before making a decision on the requirement to prepare an SEA.”</i>	The WWP have sought legal advice from the legal services team at Warwickshire County Council in response to this query. The WWP have been advised that the SEA Directive, SEA Regulations and relevant guidance have been interpreted correctly, insofar as an SEA is only required for <u>new</u> waste strategies or where significant environmental effects are envisaged from a strategy modification. The legal opinion concurs that no SEA is required for the strategy in the context that the 2013 strategy will be a refresh of the existing strategy maintaining the key principles and that no significant environmental effects are envisaged from the refresh.

A copy of the Natural England response is appended in Appendix C. A copy of the Environment Agency response is appended in Appendix D. No response was received from English Heritage.

5.2 Responses received from neighbouring local authorities

As a best practice exercise responses were also sought from neighbouring authorities during a four week consultation period between 15th October and 12th November 2013. A copy of the draft refreshed strategy was presented to the following authorities: Birmingham City Council, Coventry City Council, Solihull Metropolitan Borough Council, Staffordshire County Council, Leicestershire County Council, Northamptonshire County Council, Oxfordshire County Council, Gloucestershire County Council and Worcestershire County Council. No responses were received, and therefore it is assumed that no concerns were identified by neighbouring authorities.

5.3 Responses received from the public

A four week consultation was held during April and May 2013 for public comment on the draft objectives proposed for the refreshed 2013 strategy. The objectives were categorised under ‘reduction’, ‘re-use’, ‘kerbside recycling and composting’, ‘HWRC recycling and composting’, ‘reduction target’ and ‘recycling target’. For each category the WWP approach to setting the objectives was set out followed by a question asking respondents whether they agreed with the WWP approach, disagreed with the approach proposed or ‘did not know’. 116 responses were received in total with the majority of respondents replying to the majority of questions. Residents responded with agreement to the WWP approach in 79%, 82%, 67%, 59%, 68% and 78% of cases for each category respectively. A small proportion responded disagreeing with the partnership’s approach (8%, 8%, 19%, 15%, 18% and 8% respectively). It is in the context of these overwhelmingly

supportive public responses that the WWP developed the strategy objectives, actions and targets contained in the refreshed 2013 strategy.

6 SEA screening determination

After consideration of the scope of the refreshed Warwickshire Joint Municipal Waste Management Strategy and screening consultation with the statutory consultees, neighbouring authorities and the public, **the Warwickshire Waste Partnership determines that no significant environmental effects** will result from the refreshed strategy. The WWP considers that the changes constitute only ‘minor modifications’ to the existing 2005 Strategy, and therefore determines that there is **no requirement for a full Strategic Environmental Assessment**.

Appendix A – Detailed summary of aims and objectives comparison of existing and draft refreshed strategy

The existing strategy contained a set of strategic objectives which were supported by targets and indicators for each target. The strategic objectives were informed by 'strategic goals' decided by the WWP and 'BPEO goals' derived from the Best Practicable Environmental Option assessment conducted as part of the original strategy.

Table 3 lists the strategic objectives, targets and indicators of the 2005 strategy, the corresponding objectives, targets and indicators of the 2013 draft strategy refresh and comment / justification for any differences. Table 4 and Table 5 consider the strategic and BPEO goals of the 2005 strategy and their applicability to the 2013 draft strategy refresh.

Table 3: Comparison of 2005 Strategy Objectives, Targets and Indicators with 2013 Strategy Refresh Objectives, Targets and Indicators

2005 Strategic Objectives / Targets / Indicators			2013 Strategic Objectives / Targets / Indicators			Comment / Justification
		Page			Page	
A1	To reduce the amount of waste generated in Warwickshire	77, 92	R1	To reduce the amount of waste generated in Warwickshire	45	No change.
A1.1	Aim to reduce the quantity of waste collected per head, not exceeding 544kg per inhabitant	92	R1.1	Aim to reduce residual waste to 311kg per household, per year, by the end of the strategy period (2020)	45	This is an update of the original strategy target to reflect current trends and ambition. The original target has been achieved. The per household indicator was chosen in the strategy refresh as this falls in line with more recent NI191 reporting requirements. The per inhabitant indicator was dropped as this is unnecessary duplication. This is an update to the strategy rather than a change and therefore is within the scope of a strategy refresh.
A1.1.1	Annual kg of waste produced per person	92	R1.1.1	Annual kg of residual waste produced per household (NI191)	45	
A1.1.2	Annual kg of residual waste produced per household	92				
A1.2	To develop a waste prevention and minimisation strategy	92	R1.2	Raise awareness of waste reduction and promote behaviour change	45	The original strategy target was completed in 2007 with the launch of a Waste Minimisation Strategy for the WWP. In order to keep prioritising waste minimisation/prevention a new target has been developed to encourage this behaviour. The new target is a natural progression of the waste minimisation strategy, is consistent with the core theme of the previous target and will cause an improvement in environmental performance; and for these reasons is within the scope of a strategy refresh.
A1.2.1	Waste Prevention and minimisation strategy developed by 2006/07	92	R1.2.1	Implement and monitor key waste reduction campaigns	45	

2005 Strategic Objectives / Targets / Indicators			2013 Strategic Objectives / Targets / Indicators			Comment / Justification
		Page			Page	
A1.3	To increase reuse of materials in Warwickshire	92	R1.3	To increase re-use of materials in Warwickshire	45	Only the first indicator for this target has been altered. There are currently four HWRC re-use shops, with a fifth imminent, and four standalone re-use shops. The indicator has been updated to reflect that re-use shops are now well established in Warwickshire and that it would be more appropriate to measure the utilisation of these. This change constitutes an update to reflect the current position and is therefore within the scope of a strategy refresh.
A1.3.1	Number of reuse shops at Household Waste Recycling Centres (HWRCs).	92	R1.3.1	Tonnage of re-use in Warwickshire	45	
A1.3.2	Number of furniture reuse schemes in Warwickshire	92	R1.3.2	Number of community furniture re-use schemes in Warwickshire	45	
A2	To develop integrated, sustainable solutions for managing waste in Warwickshire	77, 92	R2	To develop integrated, sustainable solutions for managing waste in Warwickshire	45	No change.
A2.1	To reduce reliance on landfill as a primary means of waste disposal	92	R2.1	To reduce reliance on landfill as a primary means of waste disposal	45	No change.
A2.1.1	Reduction in the overall tonnages of waste disposed of to landfill	92	R2.1.1	Reduction in the overall tonnages of waste disposed of to landfill	45	
A2.1.2	Levels of recycling, composting and recovery	92	R2.1.2	Levels of recycling, composting and recovery	45	

2005 Strategic Objectives / Targets / Indicators			2013 Strategic Objectives / Targets / Indicators			Comment / Justification
		Page			Page	
A2.2	Minimise, so far as is practicably possible, the distance that waste is transported throughout the County	92		No direct comparative target [See R2.3 for replacement]	45	This target has been replaced with R2.3 (see below). Targets A2.2 and A2.4 from the original strategy concerned the transportation elements of waste management, specifically with regards to collection services. All members of the WWP have taken action where possible to reduce the distance waste is transported. This includes cost per mile incentives for HWRC operators to reduce their transport impacts (see section 4.2 of the strategy refresh). The new target introduces a more up-to date measure to consider the total environmental impact of waste management, incorporating a recently developed government tool, and therefore should be considered as an update to the strategy to reflect current best practice.
A2.2.1	Monitor distance of journeys	92				
A2.3	Monitor the development of new waste treatment technologies	92	R2.2	Monitor the development of new waste treatment technologies	45	No change.
A2.3.1	Review development and status of new technologies on a regular basis	92	R2.2.1	Review development of new technologies on a regular basis	45	

2005 Strategic Objectives / Targets / Indicators			2013 Strategic Objectives / Targets / Indicators		Page	Comment / Justification
A2.4	Investigate and implement where practicable the use of cleaner fuels when collecting (including general refuse collection) and transporting waste and for use in vehicles used at HWRC	92		No direct comparative target [See R2.3 for replacement]	45	See A2.2 above.
A2.4.1	Number of vehicles operating on alternative fuel sources	92				
			R2.3	Continually seek ways to reduce carbon emissions (including from transport) to lower the impact of the service on climate change as far as technically, environmentally and economically practicable	45	As discussed for A2.2 and A2.4 above, this is a new target introduced to reflect the new government carbon metric tool, and the increasing national policy importance of Climate Change since the original strategy adoption. The tool is an appropriate way to measure the total, and transportation element, emissions and impact of the WWP service provision.
			R2.3.1	Carbon metric tool as developed by UK Government	45	
A3	To meet landfill diversion targets established by the WET Act 2003 (diversion of BMW)	77, 92	N/A			This Objective has been removed as it is no longer reflective of national legislation.
A3.1	Develop landfill allowance trading Strategy by December 2005	92	N/A			This target has been removed as it is no longer reflective of national legislation.
A3.1.1	Strategy will be updated regularly in accordance to changes in the market for Landfill Allowances	92				

2005 Strategic Objectives / Targets / Indicators			2013 Strategic Objectives / Targets / Indicators			Comment / Justification
		Page			Page	
A3.2	Development of treatment/disposal procurement Strategy 2005-2012	92	N/A			This target has been removed as it is no longer reflective of national legislation.
A3.2.1	Development of treatment facilities and subsequent diversion of BMW from landfill (in tonnes)	92				
A4	To meet and exceed statutory recycling and composting targets	77, 93	R3	To meet and exceed national re-use, recycling and composting targets	46	This target has been updated to reflect introduction of national re-use targets and recording through NI192.
A4.1	To optimise recycling and composting within Warwickshire	93	R3.1	To optimise recycling and composting within Warwickshire	46	This indicator has been updated to reflect that all suitable properties in Warwickshire now have access to green waste collections, and therefore access to collections for other, often less conventional, waste streams is the future objective. This target has been updated to reflect the current service provision situation.
A4.1.1	Number of households served by separate green waste collection service	93	R3.1.1	Types of material that can be recycled by Warwickshire Householders	46	
A4.2	Aim to achieve enhanced, countywide recycling targets of between 40-45% by 2009/10	93	R3.2	Aim to achieve aspirational countywide recycling and composting targets of 65% by the end of the strategy period (2020)	46	This target has been updated to include re-use in line with the current reporting requirements of NI192. The aspirational target reflects that the original target has been achieved and a new more challenging target is required. This change is a temporal update of the strategy to maintain its relevance in the current climate.
A4.2.1	Recycling and composting rate %	93	R3.2.1	Re-use, recycling and composting rate % (NI192)	46	
A4.3	Extend home composting	93	R3.3	Extend home composting	46	No change.
A4.3.1	Number of households estimated to be composting at home	93	R3.3.1	Number of households estimated to be composting at home	46	

2005 Strategic Objectives / Targets / Indicators			2013 Strategic Objectives / Targets / Indicators			Comment / Justification
		Page			Page	
A4.4	Develop improved HWRC infrastructure, increasing the type of materials that can be collected and subsequently recycled. Aim to reach recycling levels of 60% at all sites	93	R3.4	Provide an effective HWRC service aiming to reach re-use, recycling and composting levels of 74% across all sites by reducing recyclables being put into the residual waste stream	46	This target has been updated to include re-use in line with other strategy targets. The aspirational recycling, composting and re-use rate has been increased to reflect current service levels which are approaching the original 60% target. There has been the introduction of new recycling streams at the HWRCs since the original strategy was adopted, notably carpets and a wider range of plastics (see section 4.4 of the draft refreshed strategy).
A4.4.1	Performance of individual HWRCs (recycling rate %)	93	R3.4.1	Performance of individual HWRCs (% rate)	46	
A4.5	Development of a phased improvement plan for HWRCs over the next 5 years	93	N/A			This target has been achieved through the complete development of two sites, planned development of another, and part development of all sites since the original strategy was adopted (see sections 3.3.2.2 and 4.4 of the draft refreshed strategy).
A4.5.1	Number of sites redeveloped	93				
A4.6	HWRC contracts maximise re-use and recycling, aim to recycle 60% at HWRCs	93	R3.4	[See R3.4 above]	46	The performance target for HWRCs has been increased as described in R3.4 above. Since the original strategy was adopted the majority of HWRC sites have been brought in-house meaning there is no longer a requirement to set targets in HWRC contracts. This update reflects the current service provision offered in Warwickshire.
A4.6.1	Recycling targets set for individual contractors. Penalty and bonus system in place	93				

2005 Strategic Objectives / Targets / Indicators			2013 Strategic Objectives / Targets / Indicators		Page	Comment / Justification
		Page				
			R3.5	Raise awareness of recycling and composting in Warwickshire and promote behaviour change	46	This target has been introduced to reflect that previous targets have either been achieved or are no longer applicable. The target will help support achievement of quantifiable targets (e.g. R3.4 – 74% re-use, composting and recycling at HWRCs) and will optimise use of service provision rather than change it. Any environmental effects resulting from this strategy update are likely to be positive and small in nature.
			R3.5.1	Implement and monitor recycling and composting campaigns	46	
A5	Work in partnership with each other and other stakeholders to produce and implement the Strategy	77, 93	R4	Work in partnership with each other and other stakeholders to produce and implement the Strategy	47	No change.
A5.1	Increase the potential for working together more formally	93	N/A [See R4.1 for replacement]		47	A memorandum of understanding has been established between the WWP authorities to increase the potential for joint working. The WWP has preferred to follow a programme of less formal partnership working, however constituent authorities have worked together on numerous projects, for example joint purchasing of kitchen caddies and regional campaign programmes. This target is no longer current due to these changes in the partnerships structure.
A5.1.1	Development of the Warwickshire Waste Partnership	93				
A5.1.2	Establishment of formal partnership with Memorandum of understanding					

2005 Strategic Objectives / Targets / Indicators			Page	2013 Strategic Objectives / Targets / Indicators			Page	Comment / Justification
A5.2	Investigate the potential for joint waste contracts		93		N/A [See R4.1 for replacement]		47	A number of joint waste contracts have been agreed by partnership authorities and neighbouring authorities, both inside and outside the partnership, as a result of investigations. For example, agreements are in place with Staffordshire CC and Gloucestershire CC concerning the operations of HWRCs. This avenue of joint working has been achieved, and it is believed that consolidating joint working to improve delivery and value for money is the next appropriate step (see R4.1).
A5.3	Examine the benefits of working with other authorities outside Warwickshire		93		N/A [See R4.1 for replacement]		47	
A5.3.1	Membership of the Midlands Recycling Consortium		93					The Midlands Recycling Consortium has been disbanded and therefore this indicator is no longer appropriate. After examination a number of partnerships have been set up with neighbouring authorities, for example at HWRCs and for street sweepings, and it is therefore considered that this target has been achieved. R4.1 will ensure that efficient joint working remains a key objective of the refreshed waste strategy.

2005 Strategic Objectives / Targets / Indicators		Page	2013 Strategic Objectives / Targets / Indicators		Page	Comment / Justification
A5.4	Investigating the possible benefits of joint purchasing and negotiating	93				The Midlands Recycling Consortium has been disbanded and therefore this indicator is no longer appropriate. Joint purchasing has been employed, for example for purchase of food waste caddies. R4.1 will ensure that cost effective joint working remains a key objective of the refreshed waste strategy.
A5.4.1	Performance of Midlands Recycling Consortium (tonnage recycled through the Consortium)	93				
			R4.1	To work Regionally and Sub regionally with appropriate stakeholders to improve value for money and service delivery	47	This new target, and indicator, consolidates the ambitions of the previous four which are no longer applicable due to changes in the partnerships working and disbandment of the Midlands Recycling Consortium. The new objective combines the aims of the previous targets to work within the partnership and with neighbouring authorities to deliver a cost effective and efficient service. This target is a consolidation of previous targets and is not likely to have a significant environmental effect.
			R4.1.1	Overall savings and/or improved service delivery	47	

2005 Strategic Objectives / Targets / Indicators			2013 Strategic Objectives / Targets / Indicators			Comment / Justification
		Page			Page	
A6	Encourage public participation in the implementation and review of the Waste Strategy	77, 93	R5	Encourage public participation in the implantation and review of the Waste Strategy	47	No change.
A6.1	Keep the public informed with progress on local and national target	93	R5.1	Keep the public informed with progress on local and national targets	47	No change.
A6.1.1	Provide web-based feedback – updated regularly to reflect changes in performance	93	R5.1.1	Provide web-based feedback – updated to reflect changes in performance	47	
A7	Regularly review and update the Strategy and implementation programme	77, 93	R6	Regularly review and update the Strategy and implementation programme	47	No change.
A7.1	Review the Strategy every 5 years	93	R6.1	Review the strategy in the final year of current strategy period – 2019/20	47	The strategy refresh is likely to be adopted by the partnership and all constituent councils in December 2013 and early 2014. Therefore a review in the final year of the strategy period is consistent with the original 2005 strategy.
A7.1.1	Feedback on changes and upload information to relevant website pages. First review in 2008/09	93	R6.1.1	Feedback on changes and put information on web	47	
A7.2	Annual reporting on progress with targets and actions	93	R6.2	Annual reporting on progress with targets and actions	47	Amended to include annual reporting to the partnership in indicator. This is a minor change and falls in line with objective A5 (R4 in the strategy refresh).
A7.2.1	Progress reported on web	93	R6.2.1	Progress reported to Partnership and on web	47	

Table 4: Incorporation of 2005 Strategy 'Strategic Goals' into 2013 Strategy Refresh

2005 Strategic Goals		Comments on incorporation in 2013 Refresh
B1	To manage our waste in order to move up the waste hierarchy and work towards resource management versus waste management	This is consistent with the strategic objectives R1 and R3, and actions R1.1, R1.2, R1.3, R2.1, R2.3, R3.1, R3.2, R3.3, R3.4 and R3.5.
B2	To minimise the amount of waste generated in Warwickshire	This is consistent with strategic objective R1 and actions R1.1, R1.2 and R1.3.
B2.1	Target of 544 kg/person	This target has been achieved (see section 4.1 of strategy refresh). As of 2012/13 waste generation per person is 461kg.
B3	To Maximise the amount of material recycled and composted in Warwickshire, and to meet and exceed our statutory recycling targets	This is consistent with strategic objectives R2 and R3 and actions R2.1, R3.1, R3.2, R3.3, R3.4 and R3.5.
B3.1	Aim to achieve national target of 40 - 45% levels of recycling and composting (2009/2010)	This target has been achieved (see section 4.4 of strategy refresh), and the new EU 2020 target has already been surpassed.
B3.2	Recycle 60% at HWRCs	The HWRC recycling rate currently stands at 56% (see section 3.3.2 of strategy refresh), however action R3.4 sets increased target of 74% by 2020.
B3.3	Lobby Government to introduce measures to encourage recycling and decrease packaging waste	This target has been achieved (see section 4.5 of the strategy refresh). The WWP intend to continue to lobby government at relevant occasions (see section 8.1 of the strategy refresh) however have not inserted a formal target for this ambition.
B4	To limit the amount of waste disposed of to landfill and to ensure that we meet our landfill diversion targets	This is consistent with strategic objectives R1 and R2, and actions R1.1 and R2.1. Landfill diversion targets set in the original strategy have been met and are no longer relevant (see section 4.3 of strategy refresh).
B4.1	Reduce our reliance on landfill, actively limiting input of biodegradable and non-biodegradable waste	This is consistent with action R2.1.
B5	To make use of existing waste treatment infrastructure in Warwickshire	This strategic goal has been achieved through further utilisation of the EfW (although technically outside the Partnership area it is centrally located in the Partnership geographically - see section 3.3.4 of the strategy refresh) for residual waste, IVC for organic waste (see section 3.4.1.2 of the strategy refresh) and the Ettington MRF for some recyclate (see section 3.4.1.1 of the strategy refresh).
B5.1	Increase our input of waste into Coventry and Solihull Waste's EfW	This has been increased almost threefold during the strategy period since 2005 (from 14,046 tonnes in 2005 to 41,194 tonnes in 2012/13 - see section 3.4 of the strategy refresh). This target has been achieved and is no longer applicable due to capacity restrictions and procured EfW capacity elsewhere (Four Ashes).
B6	To contribute to the generation of energy from a non-fossil source	This has been achieved through use of the Coventry EfW to date (see section 3.4 of the strategy refresh) and will continue to be met through future EfW projects (see section 6.3.1 of the strategy refresh).

Table 5: Incorporation of 2005 Strategy 'Best Practicable Environmental Option assessment Goals' into 2013 Strategy Refresh

2005 BPEO Goals		Comments on incorporation in 2013 Refresh
C1	Reduce the amount of waste produced in Warwickshire	This is consistent with strategic objective R1 and actions R1.1, R1.2 and R1.3.
C2	Work progressively towards higher recycling levels, exceeding current statutory targets of 30%	This is consistent with strategic objectives R2 and R3 and actions R2.1, R3.1, R3.2, R3.3, R3.4 and R3.5. The statutory targets have increased, however Warwickshire are on course to exceed all future targets.
C3	Aim to reach aspirational countywide targets of between 40-45% recycling, to be achieved by 2009/10	This target has been achieved (see section 4.4 of strategy refresh).
C4	Limit the amount of waste disposed to landfill - making use of existing waste treatment facilities e.g. Coventry and Solihull Waste's EfW facility	This is consistent with strategic objectives R1 and R2, and actions R1.1 and R2.1. Waste throughput at the Coventry EfW has increased almost threefold in the strategy period since 2005 (see section 3.4 of the strategy refresh).
C5	After maximising recycling we will treat all remaining residual waste using a thermal treatment system - generating energy from a non-fossil source	This is consistent with strategic objective R3 and actions R2.1, R3.1, R3.2, R3.3, R3.4 and R3.5.

Appendix B – Review of 2013 Strategy Refresh Implementation Plan

Table 6 lists all of the implementation plan actions of the draft 2013 strategy refresh, and demonstrates where they relate to the strategy refresh's objectives, targets and indicators.

Table 6: 2013 Strategy Refresh Implementation Plan Actions and Relevance to the Strategy Objectives

2013 Implementation Plan Action		Relevant Objectives, Targets and Indicators
I1	Implement and monitor a range of waste reduction campaigns to raise awareness and promote behaviour change (love food hate waste, smart shopping, home composting and master gardeners, junk mail, real nappies)	R1, R1.2, R1.2.1, R3.3, R3.3.1, R3.5, R3.5.1
I2	Implement measures to improve re-use through the HWRC re-use shops and bulky waste collections	R3, R3.4, R3.4.1
I3	Work with partners (re-use forum, third sector organisations, etc.) to increase re-use in Warwickshire	R4, R4.1, R4.1.1
I4	Commence review and implementation of measures to improve kerbside recycling and composting performance; such as roll out of services to flats and provision of smaller replacement residual waste bins	R2, R2.1, R2.1.2, R3, R3.1, R3.1.1, R3.2, R3.2.1
I5	Commence review and implementation of measures to improve HWRC recycling and composting performance; such review of van permit scheme, meet and greet trial and open bag policy	R3, R3.1, R3.2, R3.4, R3.4.1
I6	Implementation of various communication activities (providing information on current services and promoting behaviour change) to improve performance of current recycling and composting schemes	R1, R1.2, R1.2.1, R3, R3.5, R3.5.1
I7	Raise awareness of recycling and composting across Warwickshire by providing information on the environmental and economic benefits to the public and key stakeholders (volunteer groups, third sector organisations, schools etc.)	R3, R3.5, R3.5.1
I8	Review of waste technologies on a regular basis to optimise recycling and composting opportunities for Warwickshire residents	R2.2, R2.2.1
I9	Introduce measuring and monitoring of the carbon impact of Warwickshire's waste management (using Government guidance/carbon metric tool)	R2, R2.3, R2.3.1
I10	Continue to investigate the best solution for Warwickshire's residual waste, ensuring any new residual waste contracts support the diversion of waste from landfill	R2, R2.1, R2.1.1, R2.1.2, R2.2, R2.2.1, R2.3, R2.3.1, R3, R3.1, R3.1.1, R4, R4.1, R4.1.1
I11	Promote and support implementation of commercial services for recycling and composting of business waste (particularly SMEs) at the HWRCs	R3.4, R3.4.1

2013 Implementation Plan Action		Relevant Objectives, Targets and Indicators
I12	Consider opportunities for increased partnership working within the Warwickshire and across the region to support the efficient delivery of services and savings	R4, R4.1, R4.1.1
I13	The Warwickshire Authorities will lobby Government on key waste issues by responding to relevant consultations either individually, through relevant organisations or as a Partnership	R4, R4.1 <i>This is a key theme to support the implementation of all other aspects of the strategy in view of potential legislative and regulatory changes, guidance and governmental position.</i>

Appendix C – Consultation response from Natural England

14 November 2013

Our ref: 100936



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BY EMAIL ONLY

Dear [REDACTED]

**Planning consultation: Strategic Environmental Assessment (SEA)
Screening Consultation for Warwickshire Waste Partnership Joint
Municipal Waste Management Strategy Update**

Thank you for your consultation dated 15 October 2013.

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.

Screening Opinion

Based on the information provided, Natural England is satisfied with the assessment of no significant environmental impacts from the refresh to the Strategy, with regards to our remit.

Considering that SEA has not been undertaken for the Strategy at any stage, the Partnership should seek their own legal guidance on the application of the SEA Directive and take into account the responses of other statutory consultees at the screening stage, before making a decision on the requirement to prepare an SEA.

For any queries relating to this consultation please contact Merlin Ash on 0300 060 4271 or by email at merlin.ash@naturalengland.org.uk. For all other correspondence, please email consultations@naturalengland.org.uk, or if it is not possible to consult by email, please send to the above address.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Merlin Ash
Land Use Operations

Page 1 of 1

Please send consultations via email to: consultations@naturalengland.org.uk

Appendix D – Consultation response from the Environment Agency

Response received by e-mail.

From: [NAME REMOVED]
Date: 12 November 2013 16:45
Subject: RE: 131018/JM19 - FW: SEA Screening Consultation for Warwickshire Waste Partnership Joint Municipal Waste Management Strategy Update
To: [E-MAIL ADDRESS REMOVED]

Hi [NAME REMOVED]

The Environment Agency considers that the environmental impacts of the revised strategy (and alternative options) will not be significantly different to those of the original, therefore we are content for you to rely on the original SEA.

Regards

[NAME REMOVED]
Planning Specialist
Sustainable Places
Midlands – Central Area