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13<sup>th</sup> July 2006

Ref.

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Dear Mr. Dean,

**Planning and Compulsory Purchase Act 2004  
Town and Country Planning (Local Development)(England) Regulations 2004  
Waste Core Strategy: Preferred Options Report.**

Thank you for the opportunity to comment on the Preferred Options Report. I have a number of comments to make on the approach and content of the Report. Generally they are of a strategic nature, aimed at assisting you in the preparation of the Submission Document. They are based on consideration of the Tests of Soundness against which the Core Strategy will be examined. There are also a number of detailed comments.

Firstly it is noted that the Core Strategy Preferred Options have taken account of the Community Strategy. This is welcomed. Furthermore by setting out the spatial portrait of Worcestershire and defining the sources of waste generation in the county, the Report is moving to a spatial approach. It has also set the local context for the development of policies. However I am concerned that this is not carried through to the Strategy and the policy options. I will return to this later.

On a detailed point, you will be aware of the recent consultations regarding the Habitats Directive and the forthcoming requirement to carry out an Appropriate Assessment if proposals affect sites with European designations such as SACs. This should be taken into account and recognised in the Submission Document, even though you are not proposing site allocations.

The Preferred Options have been the subject of a sustainability appraisal which it is stated has informed their selection. A copy of the Sustainability Appraisal Report accompanied the Preferred Options Report. It would be appropriate in preparing the Submission Document to include short summaries of the conclusions from the sustainability appraisal in the Core Strategy as part of the reasoned justification supporting the policies. The sustainability appraisal is an

important part of the evidence base and you should clearly demonstrate that it has been used in the development of policies.

You have included a section on policy drivers which provides a useful context for the Core Strategy as part of the evidence and justification. You may wish to consider its inclusion as an appendix in the Submission Document, in the interests of producing a clear, succinct document.

The Core Strategy should be consistent with national policy. Policies in the Core Strategy should therefore take into account the provisions contained in PPS 10. In the light of this, a major concern is the apparent reliance on “Best Practicable Environmental Option” (BPEO) which, as you state, is not referred to in PPS 10 nor is it in the Waste Strategy 2000. You should consider clearly setting out how BPEO is translated into setting the context for the Core Strategy and its policies and its policies through the sustainability appraisal.

With regard to the development of the Preferred Options, you have set out how they have been developed from the Issues and Options. This is to be welcomed. However it needs to be clear that the Preferred Options have been derived from all the realistic options. You need to include more reasoning, from the sustainability appraisal and community engagement, in the “Reasons for Choice” rather than simple statements such as “This is the most sustainable option”.

It is noted that the Vision has evolved through community engagement. However Given that you have set out a spatial portrait you need to draw on that evidence to make the Vision more locally distinctive.

Following on from that, the Strategy itself needs to be more clearly set out in the Submission Document. Although it is not necessary at this stage to set out detailed wording, there is a lack of clarity in the development of the Strategy.

On a detailed point, in paragraph 8.7.2, it is not the concept of spatial planning which means it is not necessary to refer to national guidance. It is one of the principles of the new development plan system to make Documents clear and concise, consequently there is no need to repeat national or regional policies in Development Plan Documents. The Core Strategy and other DPDs should articulate national policy objectives in the local context.

With regard to the policies themselves you have moved to the detailed drafting of policies which is not necessarily required at the preferred options stage. There is concern that there does not appear to be a consideration of options as envisaged in paragraph 4.12 of PPS 12. In particular the authority should set out clear reasons for their selection of preferred options and a précis of the alternatives which were considered and rejected. Test of Soundness vii means that during the Examination of the Core Strategy you will need to demonstrate that all realistic alternatives have been considered.

That said, the policies themselves vary between those of a strategic nature, for example developing waste markets, to detailed development control policies. The Local Development Scheme states that the Core Strategy will include criteria based policies for assessing development proposals. This meets the guidance in PPS12 in that it will enable adequate provision of waste management facilities in appropriate locations. The Core Strategy would benefit from a clear distinction being drawn between the strategic and development control policies. On the positive side the Strategy does give clear guidance on where future development will take place.

On a further, more specific point with regard to the Green Belt policy you need to be sure that the policy relates to the Worcestershire perspective and does not simply reiterate national policy as set out in PPG 2.

With regard to implementation you have recognised that there is a wide range of bodies which will be involved in the delivery of the Core Strategy. This is welcomed. The monitoring and implementation framework, including the setting of targets and the identification of the evidence required is also welcomed. However key dates and milestones should also be included.

The assessment of how policies will meet the Strategy's objectives is helpful but it would benefit from some form of introduction. Similarly, there is useful evidence in the appendices but more clarity regarding its inclusion is required.

The Core Strategy should demonstrate its links with other strategies. It has in respect of the Community Strategy but you need to ensure that regard is had to other relevant strategies. Specifically you may wish to make reference to the Worcestershire Local Area Agreement and its relevance to waste issues.

As a final detailed point, it needs to be clear that in paragraph 7.1.9 recovery is not equal to recycling and composting as the third option but it is a fourth option of disposal when options 1 - 3 do not happen.

Finally in drawing up the Submission Core Strategy you will need to be aware of the soon to be published National Waste Strategy.

Should you wish to discuss any of these issues please contact me.

Yours sincerely

**MIKE PRICE**  
**Senior Planning Officer**

