

Worcestershire County Council

Waste Plan

Draft Project Initiation Document (PID)

Early baselining and engagement

February 2026

The content of this draft PID was finalised on Friday 12th December 2025 to enable it to progress through internal governance processes prior to consultation. This means that any changes to policy or legislation after that date will not be taken into account in the document.

Any changes to policies and guidance around plan-making will be considered as we develop the next iteration of the PID, alongside any points raised in response to the early baselining and engagement consultation.

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This is a consultation document

A questionnaire is available online, or you can print it and send it by email or post. Please answer as many or as few questions as you like. Everyone is welcome to respond.

The consultation runs from 25 February 2026 until 15 April 2026. Please respond before the deadline so your views can be considered.

Take part here: www.worcestershire.gov.uk/wasteplanningpolicy

Responses to this consultation will be considered as we prepare the Waste Plan. We'll publish a summary of the comments received and how we intend to address them. We'll continue to ask for your views as the plan progresses.

Stay up to date

Information on the Waste Plan and the evidence base will be published on our website at www.worcestershire.gov.uk/wasteplanningpolicy

If you're not already registered on our planning consultation database, you can sign up to make sure you hear about future consultations. Sign up here:

www.worcestershire.gov.uk/council-services/planning-and-developments/get-involved-planning

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1. Overview

Project title:

Worcestershire Waste Plan

Version:

1: Early baseline and engagement draft.

Date:

12 December 2025

Purpose of this PID document:

- 1.1. This Project Initiation Document (PID) sets out the management framework and approach to developing a new Worcestershire Waste Plan. It provides clarity on the plan's scope, governance arrangements, resources, and timelines. The PID is designed as a reference tool for the Minerals and Waste Planning Policy team, the council's senior leadership and elected members, and external stakeholders, supporting effective decision-making and ensuring everyone involved understands their roles and responsibilities throughout the plan-making process.
- 1.2. Significant changes to the plan-making system will result from the implementation of Schedule 7 of the Levelling Up and Regeneration Act 2023. At the time of preparing this iteration of the PID,¹ this legislation has not yet been brought into effect, and the detailed Regulations which will need to be met in developing a plan under the new plan-making system have not yet been published.²
- 1.3. This PID has been developed using the Planning Advisory Service's PID template (August 2025), as recommended by government³. It is based on the best-

¹ The content of this iteration of the PID was finalised on Friday 12th December 2025 to enable it to progress through internal governance processes prior to consultation.

² A Written Ministerial Statement of 27 November 2025 provided an update on the implementation of reforms to the plan-making system in England, stating that Government will "shortly lay the regulations that will underpin our new approach to plan-making" Written questions, answers and statements - UK Parliament: <https://questions-statements.parliament.uk/written-statements/detail/2025-11-27/hcws1104>. Alongside this, a website containing more detailed information was published ([Create or update a local plan using the new system - GOV.UK](#)), including information about what Government intends the regulations to cover. Officers are actively assessing this information and will consider the implications of the Regulations themselves once they are published.

³ Government guidance states that "We recommend you use the template provided by the Planning Advisory Service (PAS), which will help you to consider the important questions before you start preparing your plan" (Ministry of Housing, Communities and Local Government (27 November 2025) Guidance: Getting ready to prepare a new plan)

available information at the time of writing, but the PID may need to be amended at future stages to address specific regulatory requirements.

- 1.4. WCC is inviting comments on this draft PID as part of its early engagement on the development of the Waste Plan. Questions on this PID, including on WCC's proposed approach to engagement, can be found in the consultation documents available at www.worcestershire.gov.uk/wasteplanningpolicy.
- 1.5. Once finalised and approved through Worcestershire County Council (WCC)'s decision-making process, it is anticipated that this PID will be submitted to government as part of WCC's notice that preparation of the new Waste Local Plan has begun.

2. Plan scope

Role of Plan

- 1.6. As a county planning authority⁴, Worcestershire County Council (WCC) has a statutory duty under the Planning and Compulsory Purchase Act 2004 to prepare and adopt a Mineral and Waste Plan. This may consist of one or more documents which are to be known collectively as the “Minerals and Waste plan”.⁵ Worcestershire County Council is currently developing evidence to support a new Waste Plan to replace the Waste Core Strategy adopted in 2012. The Minerals Local Plan was adopted in 2022, and it is not currently in scope to replace this.
- 1.7. The Levelling Up and Regeneration Act 2023 requires that “The minerals and waste plan must set out policies of the minerals and waste planning authority (however expressed) in relation to the amount, type and location of, and timetable for, minerals and waste development, in the relevant area.”⁶
- 1.8. To accord with further requirements set out in the Levelling Up and Regeneration Act 2023, the plan must avoid inconsistency with, but also not repeat, any national development management policies, and must be in general conformity with any operative spatial development strategy⁷ in Worcestershire. The Act also states that the plan must take account of the Local Nature Recovery Strategy and be designed to ensure that development contributes to climate change mitigation and adaptation.
- 1.9. The forthcoming Regulations may also specify other matters the plan must or may address. Once adopted, the new Waste Plan will serve as the principal basis for making planning decisions on waste management development in Worcestershire, directly shaping the future growth, development, and sustainability of our communities.

⁴ Section 1 of the Town and Country Planning Act 1990 states that “References in the planning Acts to a local planning authority in relation to a non-metropolitan county shall be construed, subject to any express provision to the contrary, as references to both the county planning authority and the district planning authorities”.

⁵ Changes to the Planning and Compulsory Purchase Act 2004 which are due to be introduced through Schedule 7, part 15CB (1) of the Levelling Up and Regeneration Act 2023 state that “Each minerals and waste planning authority must, in respect of their relevant area, prepare one or more documents which are to be known collectively as their “minerals and waste plan”.”

⁶ Schedule 7, part 15CB (2) of the Levelling Up and Regeneration Act 2023.

⁷ Spatial Development Strategies are due to be introduced through the Planning and Infrastructure Bill as a system to enable strategic planning across England. [Factsheet: Strategic planning - GOV.UK](#)

Summary of Plan scope:

- 1.10. The new Waste Plan will replace the current Worcestershire Waste Core Strategy Local Plan that was adopted in 2012. Significant changes in legislation and in national and local policy have taken place since the current plan was developed.
- 1.11. The new plan will include a focus on waste as a resource, and how it can be managed as part of a circular economy⁸. It will include policies to shape the scale, location, and nature of waste management development. It is currently unknown whether the plan will allocate land for waste sites.

Relationship to other relevant plans and programmes at the regional or local level:

- 1.12. Once adopted, the new Waste Plan will form part of the statutory “Development Plan” alongside the Worcestershire Minerals Local Plan, the city, borough and district councils’ Local Plans, and any adopted Neighbourhood Plans. It is currently unclear how plan-making across Worcestershire will change under local government re-organisation and the introduction of Spatial Development Strategies⁹, and this will be kept under review as the plan develops (and is discussed further in chapter 9 Risks and mitigation).

⁸ The circular economy model promotes using products and materials for as long as possible through local maintenance, repair, reuse, refurbishment, remanufacturing, and recycling, as well as lowering consumption and reducing resource use. It seeks to address the economic and environmental impacts of waste production, resource depletion, climate change and biodiversity loss, while addressing social needs and increasing resource security. [The circular economy and sustainable manufacturing - POST](#)

⁹ The Planning and Infrastructure Bill introduced to Parliament in March 2025 will enable the government to introduce a system of strategic planning across England through the development of Spatial Development Strategies. If enacted, there will be a duty on combined authorities, combined county authorities, upper-tier county councils and unitary authorities to prepare a Spatial Development Strategy for their area.

3. Plan timeline

Plan stage:

- Before notice to commence Plan Making
- Notice to Commence Plan Making
- Gateway 1
- Vision and Strategy Development
- Gateway 2/ Draft Plan Preparation
- Gateway 3/Confirm legal compliance
- Examination to confirm soundness

Plan summary timeline

- 1.13. The Worcestershire Minerals and Waste Local Development Scheme which came into effect on 12 February 2025 set out the Council’s anticipated plan-making activities over the period February 2025 to December 2027. The timetable it set out was subject to Government implementing the new plan-making system in Summer/Autumn 2025, including through publication of Regulations, national policy updates and templates. It was noted that the included schedule for the development of the new Waste Plan was the earliest each stage of plan development may be anticipated to take place.
- 1.14. At the time of drafting this iteration of the PID¹⁰, the new plan-making system had not yet been implemented, and the Regulations, national policy updates and templates required to do so had not yet been published by Government. Consultation on draft National Development Management Policies and changes to the National Planning Policy Framework is anticipated before the end of 2025. A Written Ministerial Statement made on 27 November 2025 provided an update on the implementation of reforms to the plan-making system, but did not provide exact timescales for publishing Regulations or commencing the new system. It did, however, state that Government will “shortly lay the regulations that will underpin our new approach to plan-making” and that “planning authorities will

¹⁰ The content of this iteration of the PID was finalised on Friday 12th December 2025 to enable it to progress through internal governance processes prior to consultation.

be encouraged to bring plans forward as soon as possible following the commencement of the regulations early in the New Year.”¹¹

- 1.15. The Local Development Scheme will need to be updated (or replaced by a “Minerals and Waste Plan Timetable”, as per the provisions of the Levelling Up and Regeneration Act 2023) once there is sufficient certainty to do so.
- 1.16. The Planning Advisory Service’s PID template (August 2025) suggests the inclusion of a table to outline anticipated activities and their indicative start and end dates. This table cannot be completed yet, because the timescale for formally commencing plan-making will depend on the provision of sufficient certainty, as set out above.
- 1.17. This iteration of the PID is being published as part of an early baselining and engagement consultation prior to the formal commencement of plan-making. A completed timetable will be included in an updated version of this PID that will be published as part of the ‘Gateway 1’ stage of plan making.

¹¹ Written statements - Written questions, answers and statements - UK Parliament: <https://questions-statements.parliament.uk/written-statements/detail/2025-11-27/hcws1104>

4. Governance and decision-making

Summary of Governance

- 1.18. The project manager (Minerals and Waste Planning Policy Team Leader) will regularly inform the project sponsor (Head of Planning and Transport Planning) of progress, including highlighting any key risks or budgetary matters, through routine monthly updates.
- 1.19. Operational decisions and approvals for day-to-day spending will be authorised by the Project Manager, within the overall budget agreed by Cabinet¹².
- 1.20. A project plan and indicative timetable up to December 2027 was approved through Cabinet’s adoption of the Local Development Scheme (LDS) in February 2025. However, as noted above, the necessary regulations, policy updates and templates have not yet been published by Government for the timescales in that LDS to be met. The LDS will therefore need to be updated (or replaced by a “Minerals and Waste Plan Timetable”, as per the provisions of the Levelling Up and Regeneration Act 2023) once there is sufficient certainty to do so. Delegated authority is in place for the period 2025-2027 for the Strategic Director of Economy and Infrastructure, in consultation with the Cabinet Member with Responsibility for Economy and Skills (now the Cabinet Member with Responsibility for Business and Skills), to approve updates to the LDS and/or Minerals and Waste Plan Timetable, but an updated LDS or Plan Timetable must be returned to Cabinet for approval in 2028.¹³
- 1.21. Delegated authority has also been granted to the Strategic Director of Economy and Infrastructure, in consultation with the Cabinet Member with Responsibility for Economy and Skills (now the Cabinet Member with Responsibility for Business and Skills), to approve the preparation of a new draft Waste Plan in accordance with the LDS or Minerals and Waste Plan Timetable and any amendments to it, without the need for further formal approval of interim stages by Cabinet.¹⁴ However, the final draft Waste Plan must be considered by Cabinet and Full Council for approval before it can be published for public representations and submitted to the Secretary of State for examination. This will

¹² Worcestershire County Council Cabinet meeting of 6 February 2025, Minute 2262. Available at <https://worcestershire.moderngov.co.uk/documents/g7542/Printed%20minutes%2006th-Feb-2025%2010.00%20Cabinet.pdf?T=1>

¹³ Minute 2262, Cabinet meeting of 6 February 2025. Available at <https://worcestershire.moderngov.co.uk/documents/g7542/Printed%20minutes%2006th-Feb-2025%2010.00%20Cabinet.pdf?T=1>

¹⁴ Minute 2262, Cabinet meeting of 6 February 2025. Available at <https://worcestershire.moderngov.co.uk/documents/g7542/Printed%20minutes%2006th-Feb-2025%2010.00%20Cabinet.pdf?T=1>

require preceding approval from, in turn, the Project Manager, Project Sponsor, and Directorate Leadership.

Council Lead (Portfolio Holder) and Member engagement approach:

- 1.22. The council lead is Councillor Alan Amos, Cabinet Member with Responsibility for Business and Skills. The project sponsor (Head of Planning and Transport Planning) will regularly inform the Cabinet Member with Responsibility for Business and Skills of progress through routine monthly updates.
- 1.23. All of WCC's elected members will be consulted as part of every formal consultation. It is possible that the Regulations to implement the new plan-making system may specify other procedures for member involvement in the development of plans. If this is the case, a further resolution may be required by Cabinet.
- 1.24. Subject to successful examination, a positive Cabinet recommendation will be required for the approval and adoption of the plan by resolution of Full Council.
- 1.25. WCC's Economy Overview and Scrutiny Panel has the authority to scrutinise any aspect of the emerging Waste Plan to improve accountability, ensure transparency of decision making, contribute to service improvement, and act as a 'check and balance' on decision makers. The Panel is not compelled to scrutinise the Plan, but may choose to do so at any time.

Project Sponsor (Lead Officer) and Senior officer engagement approach:

- 1.26. The project sponsor is Emily Barker, Head of Planning and Transport Planning.
- 1.27. The project sponsor will regularly inform the Strategic Director of Economy and Infrastructure of progress, including highlighting any key risks or budgetary matters, through routine monthly updates.

5. Staff resource and management

Internal staff and support requirements

1.28. Table 1 to Table 3 below set out the staff resources within the Minerals and Waste Planning Policy Team required to develop the Waste Plan, as well as support required from elsewhere within Worcestershire County Council.

Table 1. Local Plan Manager (Overall Manager of Team and Process)

Name	Job Title	FTE
Marianne Pomeroy	Minerals and Waste Planning Policy Manager	1 FTE

Table 2. Local Plan Team

Job Level 1 (assistant grad), 2 (planner / senior), 3 Principal/ Sub Team Leader	Post status (filled / vacant)	Job title	FTE	Estimated % time in a 12-month period on Local Plan
3	Filled	Principal Planner	2.6	70
1	Filled	Project Support Officer	0.4	70

Table 3. Corporate support needs

What is required	When will it be delivered	Who will deliver (Teams and Job Titles)
Legal support and guidance to ensure Waste Local Plan is developed in accordance with all relevant legislation and case law.	Ad-hoc support may be required if and when there is a need to respond to any specific challenges raising matters of law. Support to obtain Legal Counsel if required at any stage in the plan-making process.	Legal Services: Head of Commercial Law Principal Solicitors and/or Highways/ Planning/ Contentious Locum Solicitor

What is required	When will it be delivered	Who will deliver (Teams and Job Titles)
Advice and guidance on engagement strategy, consultation materials and events.	<p>In advance of (and potentially also during and/or after) key outputs/consultation periods.</p> <p>Scoping and production of an engagement strategy/Councillor and key internal and external stakeholder briefings/ early engagement on forthcoming plan production.</p> <p>Guidance about running in-person and/or online engagement events.</p>	<p>Content and Communications Team: Content Creative</p>
Advice on procuring any necessary external support and/or software solutions, including advice on market engagement, support in drafting tender specifications, managing the tendering process, reviewing contracts, and any specific issues that may arise.	Primarily in advance of contracts being signed with external consultants, specialists or software providers, but also throughout the period of the contracts, as required.	<p>Commercial Team: Strategic Category Lead Category Manager</p>
Advice and guidance on digital mapping to support the plan.	Support required throughout plan development to ensure mapping (GIS) addresses requirements. Maintenance of digital mapping post-adoption.	<p>IT and Digital: GIS Programme Manager GIS Digital Developer</p>
Assistance in publishing relevant material online, ensuring accessibility requirements are met.	Throughout process, and especially prior to, during and after consultations.	<p>Digital, Data and Web Services Team: Web Development and Digital Content Designer</p>

What is required	When will it be delivered	Who will deliver (Teams and Job Titles)
<p>Advising on IT requirements for any necessary digital planning solutions, including the use of any AI capabilities.</p>	<p>Primarily in researching and procuring any software solutions, but also throughout the period of any contracts, as required.</p>	<p>IT and Digital: Assistant Director of IT and Digital</p>
<p>Advice and guidance on liaising with WCC members, including CMR, Cabinet, and Full Council. Advice may also be required on engaging with district and parish councillors.</p>	<p>Throughout process, but especially in the lead-up to key political decision points (approvals of consultations and adoption) to understand specific timings and any necessary preliminary process.</p>	<p>Legal, Democratic and Governance: Head of Commercial Law Assistant Director for Legal, Democratic and Governance Overview and Scrutiny Manager</p>
<p>Policy-specific advice</p>	<p>During policy development, site assessment (if applicable) and examination.</p>	<p>Relevant WCC departments, including Development Management (Planning) Highways Development Management and Highways Development Control, Historic Environment, Landscape, Environmental Policy (ecology), Countryside Greenspace and Public Rights of Way, Flood Risk Management</p>

What is required	When will it be delivered	Who will deliver (Teams and Job Titles)
Advice and guidance on protected characteristics and compliance with the Equality Act 2010	Throughout process, especially in undertaking Equality Impact Assessment screening or full assessments.	Equality, Diversity and Inclusion Lead
Advice and guidance on information management and compliance with data protection legislation.	Throughout process, especially in researching and procuring any software solutions, and prior to, during and after consultations.	Information governance services: Head of Information Governance Services Information Governance Manager Information Access & Compliance Manager
Advice and support in budget management and monitoring.	Throughout plan development.	Finance Team: Finance Business Partner

Identification of any additional skills requirements

1.29. At this stage, it is expected that external consultancy support will be required for at least the following elements of developing the Waste Plan:

- Specialist consultancy to undertake Sustainability Appraisal / Strategic Environmental Assessment (or Environmental Outcomes Reports)
- Specialist consultancy to undertake Habitats Regulations Assessment
- Specialist consultancy to undertake Strategic Flood Risk Assessment
- Specialist consultancy to undertake a Transport Assessment

1.30. A Programme Officer will be required who will be responsible for the day-to-day administration of the examination of the Waste Plan before, during and after hearing sessions. It is anticipated that a Programme Officer may also be required for Gateway 2 and Gateway 3. The Programme Officer will work for the Inspector,

but will be paid for and appointed or procured by WCC. It is considered likely that an external Programme Officer will need to be procured.

- 1.31. Other external support/specialist consultancy may also be required, if a need is identified for specialist assessments. These could include land quality assessment, transport assessment, air quality assessment, industrial land studies, green belt assessment, etc.
- 1.32. Targeted training is likely to be required, and potentially the procurement of specialist software, in order to meet anticipated requirements for digital plan-making. The requirements are not yet known.

6. Evidence

1.33. Table 4 lists the key pieces of evidence which will be required in developing the Waste Plan.

Table 4. Key evidence

Key evidence	Area covered (e.g. just LPA or broader)	In house, externally commissioned	Key stakeholders who need to input	Dependencies with other evidence documents
Waste Needs Assessment	LPA, plus consideration of strategic imports/exports that could potentially be from any other LPAs in England.	In-house	<p>Key stakeholders are likely to include:</p> <ul style="list-style-type: none"> • West Midlands Resource Technical Advisory Body • Waste Industry • Environment Agency • Other waste planning authorities with whom there could be a strategic relationship <p>However, as a key piece of evidence supporting the plan, WCC is likely to include the WNA in the package of consultation documents open to comment by any interested party.</p>	None
Evidence to inform a vision for the plan	LPA	In-house	<p>Key stakeholders are likely to include:</p> <ul style="list-style-type: none"> • Local communities • Waste industry • Environmental and economic bodies • Transport authorities 	Will be influenced by other evidence documents
Evidence to inform a Spatial Strategy	LPA	In-house	Waste industry, West Midlands Resource Technical Advisory Body, WCC Development Management	May influence or be influenced by site options considered in Site (Selection) Assessment.

Key evidence	Area covered (e.g. just LPA or broader)	In house, externally commissioned	Key stakeholders who need to input	Dependencies with other evidence documents
(may include matters such as average land-take for different types of facilities, circular economy / proximity considerations between waste arisings and existing waste management hubs or industrial processes)				
Site (Selection) Assessment	LPA	In-house	Landowners, developers, waste industry, environmental bodies, local (and potentially national) highways bodies	If a site (selection) assessment is required (this is yet to be confirmed), it will need to be informed by a wide range of evidence. Likely to be influenced by (or to influence) evidence informing a spatial strategy.
Strategic Environmental Assessment / Environmental Outcome Report	LPA	Externally commissioned	Minimum legal requirement is consultation with three statutory consultees: Natural England, the Environment Agency, and Historic England. WCC is likely to publish SEA/EOR reports for wider comment, but is not legally required to do so.	No absolute dependencies, but SEA has traditionally been informed by the findings of other assessments, including assessments of impacts on landscape, historic

Key evidence	Area covered (e.g. just LPA or broader)	In house, externally commissioned	Key stakeholders who need to input	Dependencies with other evidence documents
				environment, health, flood risk, and agricultural land quality.
Strategic Flood Risk Assessment	LPA	TBA. Currently unclear if assessment will be required, because sufficient information may be available in district-level SFRA documents. If it is required, it will be externally commissioned.	<p>Key stakeholders are likely to include:</p> <ul style="list-style-type: none"> • Worcestershire County Council’s Flood Risk Management team • Environment Agency • North Worcestershire Water Management • South Worcestershire Land Drainage Partnership 	<p>The Strategic Flood Risk Assessment will influence and be influenced by strategic policies and any consideration of site allocation options. The NPPF (December 2024) states “<i>Strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources</i>” and “<i>Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test.</i>”</p> <p>PPG states that “<i>Minerals and waste planning authorities will use your [i.e. district LPA] SFRA to inform their</i></p>

Key evidence	Area covered (e.g. just LPA or broader)	In house, externally commissioned	Key stakeholders who need to input	Dependencies with other evidence documents
				<i>minerals and waste local plans” and “They [i.e. WCC] may need to prepare additional flood risk information, depending on what is included in their plans”.</i>
Transport Assessment	LPA and potentially parts of surrounding authority areas (to be confirmed).	Likely to be externally commissioned.	Internal WCC Highways team National Highways Potentially Canal and Rivers Trust, Network Rail/Great British Railways	A transport assessment would influence and be influenced by strategic policies and any consideration of site allocation options.

7. Stakeholder engagement

- 1.34. At present, Worcestershire County Council’s “Statement of Community Involvement” sets out the approach to consultation during the development of minerals and waste planning policy.¹⁵ However, when the new plan-making system is brought into effect, there will no longer be a requirement to produce and update a “Statement of Community Involvement”. Instead, planning authorities will need to set out their approach to engagement in their PIDs.¹⁶
- 1.35. Subject to specific requirements which may be set out in the new regulations to implement the plan-making aspects of the Levelling Up and Regeneration Act 2023 and/or in national policy, we have set out below how we intend to approach engagement at formal public consultation stages throughout the development of the new Waste Plan. This has been informed by the methods currently set out in the Statement of Community Involvement.
- 1.36. You can comment on the proposed engagement methods by completing the questionnaire available at www.worcestershire.gov.uk/wasteplanningpolicy.

Engagement methods

Methods we will use

- **Web pages**

- 1.37. We intend to use the Waste Plan web pages as the main ‘go-to’ page during the development of the Waste Plan, where members of the public can find all consultation materials, find information about where we are in the process, and anticipated next steps.

- **Libraries and/or council offices**

- 1.38. Subject to any requirements which may be set out in regulations or national policy, we intend to enable people to view consultation materials electronically at libraries and/or council offices during their normal opening hours. Library and front-line staff will be asked in advance to support this during core staffed hours, including assisting people with accessing materials and completing any questionnaires online.

- **Press release**

- 1.39. We intend to provide press releases to traditional media outlets across the county, as well as publications aimed at the waste industry. All press releases

¹⁵ www.worcestershire.gov.uk/sci.

¹⁶ [Government response to the proposed plan-making reforms: consultation on implementation - GOV.UK](https://www.gov.uk/government/consultations/government-response-to-the-proposed-plan-making-reforms-consultation-on-implementation)

will direct readers to our Waste Plan webpages, where they can access further information and, importantly, take part in the consultation exercise.

- **Social media**

1.40. We intend to post information on social networking sites, with the posts directing people to our Waste Plan webpages to find more information.

1.41. We will ensure that the content posted is as engaging as possible by focusing on why the plan is relevant to people, how easy it is to take part, and using simple language rather than technical terms. We will work with our communications team to ensure social media messaging is about impact not process. For example, most people don't get excited by the words "Waste Plan consultation" but they do care about impact on their neighbourhood, costs, and the environment.

- **Planning consultation database**

1.42. At present, the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) list the specific and general consultation bodies Worcestershire County Council is required to consult, where appropriate, and also "such residents or other persons carrying on business in the local planning authority's area from which the Local Planning Authority consider it appropriate to invite representations". Worcestershire County Council maintains a planning consultation database and we intend¹⁷ to continue to use this to send consultation emails/letters to specific consultees, as well as any general consultees, residents and other interested parties who have registered on the database for information about Waste Planning Policy.

1.43. We will continue to publish social media campaigns, approximate twice yearly, to encourage people to register on WCC's planning consultation database. The approach will make registration feel useful, easy and worthwhile. Messages will be focused on the benefits of signing up, such as receiving timely consultation updates, having a say on planning decisions, and staying informed about local issues, rather than on the database itself.

- **Posters**

1.44. We intend to produce a poster to accompany any public consultations. Posters will be sent to Council Members and Parish Councils, with requests to display them and/or share them with local residents and businesses. The poster will also

¹⁷ Subject to any changes which need to be made to address the specific requirements of the new regulations which will implement the plan-making aspects of the Levelling Up and Regeneration Act 2023.

be sent to libraries in the county with a request for them to be displayed either physically or on digital displays.

- 1.45. We will include a QR code on posters to take people to our website, as well as including the website address.

*Methods we **might** use*

- **Public Notice**

- 1.46. In the past, we have published a formal public notice at the start of consultations in each of the county's newspapers. Whether we continue to do so is likely to depend on any requirements set out in the new regulations.
- 1.47. This method theoretically provides good coverage of the message across the county, but there is little evidence as to whether or not the public notices are actually read and reach a wide audience via this route. The cost of placing public notices in all the county's newspapers is quite substantial¹⁸, and consideration will be given to whether this method offers value for money if it is not a clear legislative requirement.
- 1.48. An alternative option may be to only post the information that would traditionally be included in a public notice on the Council's website.

- **Interactive plans or "story maps"**

- 1.49. This method would involve hosting plan content in a way which can be searched/interacted with by theme, location, or type of consultee, rather than simply being presented as a static PDF document.
- 1.50. We will explore options which would provide more interactive engagement with plan content in a way which meets any requirements which may be set out in regulations and national policy in due course.

- **In-person consultation events**

- 1.51. This method might involve hosting events in public spaces such as village halls or libraries, spreading opportunities to attend across the county. These would be aimed at providing information and an opportunity to ask WCC officers questions about the consultation.
- 1.52. Subject to any requirements which may be set out in regulations or national policy, we will consider the practicalities and costs of this option. In the past, attendance at such events has been low and they are resource-intensive to run. However, we believe that those who have attended have found them helpful. If

¹⁸ Exact costs depend on the length of the notice, but for previous mineral and waste plan consultations have been in the region of £5,000 per consultation.

such events are to be held, we would look to tailor the number and location of events to be appropriate to the stage of plan making.

- **Virtual consultation rooms**

1.53. This method would involve hosting a website with key pieces of information for people to explore, almost as though they were at an “in-person” display in a village hall or shopping centre.

1.54. Subject to any requirements which may be set out in regulations or national policy, we will consider the practicalities and costs of this option.

- **Online presentations or consultation events**

1.55. This method could involve a range of options such as a non-interactive presentation, interaction by posting questions in a limited environment, through to fully interactive sessions.

1.56. Subject to any requirements which may be set out in regulations or national policy, we will consider the practicalities and costs of these options, including how to ensure they would be run in a way which protects participants’ personal data, and enables constructive conversations.

- **Stakeholder workshops (in person or online)**

1.57. This method could involve hosting targeted workshops on specific matters or for specific stakeholder groups. These might be held in-person, or through online meeting technology.

1.58. Subject to any requirements which may be set out in regulations or national policy, we will consider the practicalities and costs of these options, including how to ensure they would be run in a way which protects participants’ personal data, and enables constructive conversations to take place. If such events are to be held, we would consider whether to tailor the number, focus, and location of events as appropriate to different stages of plan making.

Developing an engagement strategy

1.59. Subject to any specific requirements which may be set out in the new regulations to implement the plan-making aspects of the Levelling Up and Regeneration Act 2023 and/or in national policy, we intend to consider the above engagement methods and will develop this into an engagement strategy.

1.60. We will seek to undertake stakeholder mapping as a means of identifying relevant groups who are likely to have an interest or influence over the issues being considered and addressed in the development of the Waste Plan.

1.61. From this, we may be able to tailor the engagement methods used at different stages of plan development to ensure consultation is effective and meaningful,

and uses stakeholders' preferred communication channels as far as possible. This approach will increase the likelihood of participation, build stronger relationships, and enable resources to be used efficiently.

- 1.62. The engagement strategy will also seek to clarify the extent of influence participants are likely to have on the development of the Waste Plan at each stage. For example, we will highlight any stages at which stakeholders might be contacted primarily with information about proposals or decisions, versus stages where their consultation feedback can meaningfully shape different aspects of the plan.
- 1.63. Clearly communicating when consultation offers a genuine opportunity to influence priorities, propose alternatives, or affect outcomes will help manage expectations, encourage meaningful participation, and build trust in the process. Participants are more likely to engage fully if they understand that their input could have a real impact on how the plan is developed and implemented.
- 1.64. The engagement strategy will also set out how we intend to evaluate the success of the methods used. This is likely to include evaluation at the end of each consultation stage which may lead to updating the engagement strategy in place for future stages. Consideration will also be given to whether it is possible to evaluate success during engagement exercises, such as by monitoring participation levels, audience reach and feedback trends to understand who is engaging, how they are engaging, and what is generating the most interest. This may only be possible in relation to some methods used (for example, monitoring social media reach is likely to be possible within a consultation, but monitoring engagement resulting from a Public Notice in newspapers may not be possible). If digital plan-making software is employed, this might offer additional opportunities to monitor engagement and react flexibly.

8. Budget overview

Cost estimates:

- 1.65. At WCC, plan development work is a core funded activity supported by a specific reserve to fund specialist development plan work including staffing, specialist consultants, and the costs of public consultations and examination in public.
- 1.66. Internal staff resources in the Mineral and Waste Planning Policy Team are dedicated to producing mineral and waste planning policy, including producing the necessary evidence documents and supervising the consultants producing the various appraisals and assessments required, and monitoring the implementation of plans. The team is supported by the Development

Management, Place Planning and Environmental Policy teams for specialist input where required.

- 1.67. External consultants are to be used primarily to undertake statutory assessments where specialist knowledge is required and is not available internally or where a degree of independence from the Council is advantageous. The Council's procurement processes will be followed to ensure demonstrable value for money.
- 1.68. The Council does not currently use any specialist plan-making software. Over the last few years, the Government has sought to grow the market for plan-making software solutions to help facilitate more efficient plan-making processes and effective community engagement. This specialist software could help to facilitate internal processes for the development of policies, engagement with stakeholders and communities, the management and consideration of consultation responses, and the submission and consideration of spatial data. At present there is forecast to be insufficient budget allocated for such developments. Following consideration of any requirements set out in forthcoming regulations and national policy and associated costs, risks, benefits, and implementation timelines for software which would help us to meet these requirements, funding options will be explored and internal budget approval processes will be followed.
- 1.69. At the time of considering the Local Development Scheme in February 2025, it was noted that until clarity is available about how and when the new plan-making system will be implemented and the activities which will be required, there was a significant level of uncertainty about the costs which would be incurred in developing the Waste Plan. A best estimate, based on previous plan-making experience and some contingency, had been developed to account for staff time, specialist consultants, specialist software, public consultations, potential new "Gateway Assessments" and Examination in Public. This was estimated to be in the region of £1.9 million.
- 1.70. Worcestershire County Council's Cabinet approved the allocation of up to £1.9 million from the earmarked Waste and Mineral Strategy Reserve to undertake the activity contained within the Local Development Scheme (February 2025 – December 2027).¹⁹

¹⁹ Minute 2262, Cabinet meeting of 6 February 2025. Available at <https://worcestershire.moderngov.co.uk/documents/g7542/Printed%20minutes%2006th-Feb-2025%2010.00%20Cabinet.pdf?T=1>

Budget reviews:

- 1.71. The project manager (Minerals and Waste Planning Policy Team Leader) will regularly inform the project sponsor (Head of Planning and Transport Planning) of progress against the budget, including highlighting any key risks, through routine monthly updates.
- 1.72. Where a significant change to project scope (such as additional evidence studies) is identified, this will be escalated to the Directorate Leadership Team.
- 1.73. An estimated profiled spend across the project lifetime and progress of actual versus estimated spend is maintained by the project manager and discussed with the project sponsor and Finance Business Partner at key points during the financial year or as necessary if significant changes are identified.

9. Risks and mitigation

1.74. The key risks are identified in Table 5, along with the likelihood of them occurring, the level of risk if they should occur, and mitigation in place to manage the risks.

Table 5. Summary of key risks identified

Risk	Likelihood – high, medium, low	Risk level – high, medium, low	Mitigation
Anticipated elections preventing consultation	High	Medium	<p>Planning matters can be contentious, and WCC’s pre-election guidelines advise against launching new consultations on matters which are politically contentious during a pre-election period.</p> <p>WCC’s project plan will include dates of pre-election periods where advance notice is available, and consultations will be planned to avoid these periods. The project plan may need to be amended to reflect changes to election cycles once more detail is known about the outcomes of local government reorganisation.</p>
Unexpected elections preventing consultation	Low	Medium	<p>Unplanned political events, including by-elections, are difficult to accommodate, and could require consultation dates to be changed at short notice, with resulting delays to plan production. This risk will be minimised by ongoing liaison with the Deputy Director of Legal and Governance to identify any such events .</p>
Other unanticipated political decisions	Medium	High	<p>Whilst plan-making is a statutory duty, and government has powers to intervene if progress in plan-making is not sufficient, it is nonetheless open to councillors to make decisions which could affect the speed or direction of plan-making, such as the allocation of budget, calling in the plan during development and directing particular activities to be undertaken, ceased or changed, or resolving not to submit the plan for examination.</p> <p>This risk will be mitigated as far as possible through informing and consulting councillors during the development of the plan.</p>

Risk	Likelihood – high, medium, low	Risk level – high, medium, low	Mitigation
Local government re-organisation	High	High	<p>Two proposals have been submitted to government for local government reorganisation in Worcestershire: a single unitary council covering the whole county, and a two-council north/south split. Government is due to make a decision on how to proceed in summer 2026. Current government proposals envisage elections to the shadow council or councils taking place in May 2027, followed by the appointment of interim leaders and a phased transfer of services, aiming for full operational status by 1 April 2028 (Vesting Day).</p> <p>Decisions on whether/how to proceed with the Waste Plan and other Local Plans will rest with the elected members of any new council(s). This could change the geography and/or scope of the plan. The mitigation for this is limited to maintaining awareness of the process and timescales for re-organisation, and undertaking informal discussion of options with current leadership in advance of shadow elections taking place.</p> <p>Capacity does not exist to develop different iterations of the Waste Plan at the same time (for example to anticipate waste policies forming part of one or more overarching unitary Local Plans).</p>
Changes to legislation or policy	High	High	<p>Changes to legislation and policy that come into effect during plan preparation could require unplanned revisions to the plan. Some changes can be anticipated to a degree, but others may arise during the course of plan development and the impact of such changes cannot be known in advance. Anticipated legislative changes for which the full implications and timescales are not yet known include the Planning and Infrastructure Bill (particularly the introduction of Spatial Development Strategies, and changes to habitat and species protection) and implementation of the Levelling Up and Regeneration Act’s provisions to change the requirement for Sustainability Appraisal / Strategic Environmental Assessment to Environmental Outcome Reports.</p> <p>Implications could include additional evidence gathering, reformulation of policies, the need to</p>

Risk	Likelihood – high, medium, low	Risk level – high, medium, low	Mitigation
			<p>repeat consultation stages, and/or production of additional statutory documents.</p> <p>This risk will be minimised by following developments in emerging legislation and policy and maintaining an awareness of the government’s direction of travel, including through following ministerial announcements. WCC will also maintain engagement in professional networks to both ensure early knowledge of forthcoming legislation and policy and develop understanding of its impact.</p>
Lack of evidence	Low	High	<p>If the data necessary to inform policy development is not available when expected (for example, as a result of delays to the publication of national datasets, or failure of operators to respond to WCC queries), this could lead to delays. This risk is being reduced through the use of readily available data wherever possible, and by ‘front-loading’ the evidence process by establishing a strong evidence base (and methodology for updating that evidence base) in the Waste Needs Assessment before the plan-making period begins.</p>
Staffing changes	Medium	High	<p>WCC has had a stable Minerals and Waste Planning Policy team for some years and currently has no vacancies, but the scale of changes in local government due to take place during the development of the plan means the likelihood of natural turnover or changes imposed through splitting into two councils or restructuring within one unitary council are higher than normal. There is very limited capacity within the team to absorb additional workload if staff are temporarily or permanently unavailable, or if additional responsibilities or new workstreams arise. Depending on the nature of the tasks, it may be possible to re-allocate officers from the wider WCC planning team (or future unitary council teams) to work on the Waste Plan, but this cannot be relied upon in advance, and those officers are unlikely to have the specialist minerals and waste policy knowledge of the existing team. Even if capacity to re-allocate was available, delays to the plan timetable would be likely, due to the need to upskill those officer(s) in minerals and waste</p>

Risk	Likelihood – high, medium, low	Risk level – high, medium, low	Mitigation
			<p>policy development. Limited financial contingencies are in place that could enable the commissioning of specialist consultants to temporarily backfill for any absences, but this too would be likely to lead to delays, not least because of the specialist nature of waste planning policy work, which is likely to limit the availability of suitably qualified consultants who would be immediately available.</p>
Financial constraints	Medium	Medium	<p>A budget for preparing the Waste Plan of up to £1.9 million from the earmarked Waste and Mineral Strategy Reserve has been agreed by Cabinet. This reflects the best estimate of likely costs based on previous plan-making experience and some contingency, accounting for staff time, specialist consultants, public consultations, potential new “Gateway Assessments” and Examination in Public.</p> <p>However, whilst Government has confirmed that the costs of the new Gateway Assessments will be recouped from councils, we do not yet have a clear idea of what these costs may be. Costs for an Inspector’s time at examination are set out as an hourly rate, but it is difficult to anticipate how many hours of an Inspector’s time will be required.</p> <p>While the approved budget includes a degree of contingency to accommodate unforeseen costs, it is possible that the planned budget could be exceeded. Unexpected costs could occur for a variety of reasons, including but not limited to: inflationary pressures increasing consultancy costs; the scope of evidence-gathering exceeding what was planned; unforeseen costs associated with technology; or an unexpectedly high volume and/or complexity of consultation responses that require lengthy analysis or additional evidence gathering.</p> <p>Exceptionally, wider county-wide financial pressures could potentially lead to reductions in the agreed Waste Plan budget, although this is considered unlikely.</p> <p>The impact of exceeding the planned budget could be significant. If a sufficient budget is not available, it may not be possible to carry out the required elements of plan-making, such as</p>

Risk	Likelihood – high, medium, low	Risk level – high, medium, low	Mitigation
			<p>commissioning statutory reports and running consultations.</p> <p>These risks will be mitigated by maintaining close monitoring of expenditure and seeking best value through any procurement processes. Opportunities to reduce costs by sharing services with other authorities will be kept under review (including any savings from local government reorganisation). The use of existing council facilities/technology/venues will always be explored in preference to the external market.</p> <p>Opportunities for cost-savings through using AI, and through running virtual consultations rather than in-person events, will also be explored.</p>
IT/technical issues	Low	Medium	<p>Technical issues could arise through outages, hardware or software failure, unfamiliarity with new systems, and problems with mapping software. Mitigation will come from having back-ups in place and ensuring that any changes to systems that are known in advance are accommodated (e.g. if it is known that a new GIS system is coming into place, training on that system can be scheduled in advance).</p>
Availability of internal specialists	Medium	Medium	<p>Support from additional areas of the council will be needed during the development of the Waste Plan, as set out in chapter 4 of this PID. The scale of changes in local government due to take place during the development of the plan means the likelihood of natural turnover or changes imposed through splitting into two councils or restructuring within one unitary council are higher than normal, and the resources in each specialist area are already quite limited in most cases.</p> <p>Internal support is often on the basis of cost-recovery charged to the plan budget, and therefore it may be possible to use this budget to seek external support if internal support is not available. However, this is very likely to be at higher cost, take longer to procure, and be unlikely to match the level of local knowledge provided by internal support.</p> <p>Risks will be mitigated by giving as much advanced warning to internal specialists as</p>

Risk	Likelihood – high, medium, low	Risk level – high, medium, low	Mitigation
			possible so that they can embed anticipated work in their own work plans.
Availability of external specialists	Medium	High	<p>With the drive from government for Local Plans and Minerals and Waste Plans to be kept up to date, there is significant demand at present for limited external resources, which could make obtaining external contractors more difficult and/or more expensive than anticipated. Support will be sought through WCC’s procurement team to ensure tendering is at an appropriate level, such as by undertaking soft market engagement prior to full tendering.</p> <p>WCC procurement policies give significant weight to cost, which could put at risk the quality of the support procured. This will be mitigated as far as possible by ensuring tender specifications and procurement assessment criteria are developed with quality criteria embedded as far as possible.</p> <p>Limited resources within WCC’s procurement team could lead to delays in procurement processes or management of contracts. This will be mitigated by early conversations between the Minerals and Waste Planning Policy Team and the Procurement Team.</p> <p>Contracts with external suppliers will be overseen by the Minerals and Waste Planning Policy Team, with Key Performance Indicators included within tender documents to ensure that work can be assessed against timescales and quality measures which all parties are aware of from the outset.</p> <p>Any delays to the project could lead to additional costs being incurred by external contractors, which are then passed on to WCC. Tender documentation will seek to establish parameters to manage this.</p>

10. Approvals and version control

Table 6. PID author

Author name:	Title
Marianne Pomeroy	Team Leader (Minerals & Waste Planning Policy)

Table 7. PID approvals

Approver name:	Title	Date approved and method
Emily Barker	Head of Planning and Transport Planning	Reviewed December 2025
Rachel Hill	Acting Strategic Director of Economy and Infrastructure	Approved at Directorate Leadership Team meeting 22 nd January 2026
Cllr Alan Amos	Cabinet Member with Responsibility for Business and Skills	Approved at Cabinet Member briefing 3 rd February 2026

Table 8. PID version control and change log

Date of change (specifying version)	Author	Reason	Updated version title