

From: [REDACTED]
Sent: 07 September 2017 11:26
To: Blackcountrycorestra
Subject: Black Country Core Strategy Issues and Options
Attachments: Issues and Options 07.09. Biffa comments.pdf

Importance: High

Good Morning

Please find attached our comments on the issues and options report for the Black Country Core Strategy Review. I have been having difficulties using the on line system and did not want to miss the deadline hence sending these direct. I have logged the problem with your colleagues via the online help page.

Kind regards.



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Our ref: MT/070917/BCIO.P
Date: 7th September 2017

Black Country Core Strategy Review
c/o Dudley Metropolitan Borough Council

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By email

Dear Sir/Madam

***BLACK COUNTRY CORE STRATEGY ISSUES AND OPTIONS REPORT
CONSULTATION***

Thank you for providing us with an opportunity to take part in the consultation on the Issues and Options stage of the Black Country Core Strategy review..

Biffa

Biffa is a leading UK-based integrated waste management business. The Group operates across the breadth of the waste management value chain, including the collection, treatment, processing and disposal of waste and recyclable materials, as well as related work in the production and sale of energy derived from waste and the sale of recovered commodities such as paper, glass, metals and plastic. Biffa's customer base for these services includes local authorities (which includes the collection of waste from households), large corporates and SMEs, and purchasers of end-product commodities and energy. Across its operations, the Group managed approximately 6.7mT of waste in Fiscal Year 2016. The Group's services are organised across four operating divisions: Industrial & Commercial; Municipal; Resource Recovery & Treatment (RR&T); and Energy. In Fiscal Year 2016, the Group's total revenue was £927.5 million, its Underlying EBITDA was £122.3 million, and its Underlying Operating Profit was £62.5 million.

Biffa has a number of operations across the Black Country, most notably:

- Aldridge Material Recycling Facility in Walsall;
- Wednesbury Hazardous Waste Transfer and Treatment Facility;

- Tipton Material Recycling Facility and Transfer Station;
- Foxyards Depot and hazardous waste facility in Dudley.

Our Comments on the Consultation:

We support the spatial objective on waste at paragraph 4.6. We agree that the key objective should be to provide sufficient waste recycling and waste management facilities in locations which are the most accessible and which have the least environmental impact.

Turning to the waste policies (policy area G):

Question 105: We agree that Policy WM1 identifies all of the key issues. It is important to note that waste management facilities are part of key strategic infrastructure and play a vital role in supporting the local economy. It is essential that sufficient waste capacity across the whole of the waste hierarchy is provided including facilities for recycling, recovery and disposal.

We note that you will be gathering waste evidence to inform the emerging Core Strategy and that you will be carrying out a waste study. Biffa has produced two in depth reports that address issues around waste management capacity and the essential provision of new capacity. The two “Reality Gap” reports can be found at the following link:

<https://www.biffa.co.uk/media-centre/publications/>

Question 106: We fully support policy WM2 which seeks to safeguard existing waste management facilities from redevelopment and also from encroachment by other development, most particularly, housing. Our facilities in the Black Country are key strategic assets and should be protected and offered sufficient flexibility in their operations such that they can continue to provide a service to local businesses. The hazardous waste facilities in particular have a more regional and potentially national role and are specialist operations that must be protected from encroachment.

I trust that our comments are helpful and would be grateful if you could keep us informed as the new Core Strategy emerges. In the meantime should you have any questions regarding any of the matters raised then please do not hesitate to contact me.

Yours faithfully
For **Biffa**




Group Planning and Development Manager