

Nottinghamshire and Nottingham Waste Core Strategy Proposed Submission

Councils' Proposed Responses to Representations - DRAFT

September 2012

<i>Rep No. (Response No.)</i>	<i>Nature</i>	<i>Respondent(s)</i>	<i>Summary of Representation(s)</i>	<i>Change(s) Sought</i>	<i>Councils' Response</i>	<i>Councils' Proposed Change(s) to Plan</i>
Whole Plan						
22843 (10280)	Object	Highways Agency	<p>The Agency welcomes continued engagement and seeks to ensure that an adequate assessment is undertaken of the impacts of proposed waste facilities on the SRN, possible mitigation and sources of funding.</p> <p>It would be helpful if the Core Strategy demonstrated that consideration has been given to the overall implications of additional traffic movements and the extent to which this may give rise to specific problems on the Strategic Road Network. This will help to demonstrate that potential transport impacts have been appropriately considered and any significant implications for deliverability minimised.</p>	<p>Include additional text/evidence to demonstrate how traffic impacts have been/will be assessed in the Waste Core Strategy and later documents.</p>	<p>Partially accepted - the Councils understand the Highways Agency's concern but would stress that this is a non-site specific stage and it is therefore difficult to provide a detailed assessment. However, the underlying principles of the spatial approach are to locate development close to the source of waste and thereby minimise transport distances, to promote alternative forms of transport and to make the best use of the existing highway network (SO5, WCS3, WCS6 and WCS10). As part of the evidence-gathering for the Core Strategy the Councils have used traffic monitoring data to map traffic flows on key routes and identify significant areas of congestion. At the site-specific stage it will also be possible to use detailed computer models to assess the impact of individual sites.</p>	<p>No change proposed but actions will be carried forward to the site-specific stage.</p>
22791 22990 23005 (10279)	Object	Sneinton Tenants and Residents Association (STARA) / Occupy Nottingham (Mr C Freeman) / Ms P Daly	<p>The terms recycling and energy recovery are shown incorrectly - recycling does not include energy recovery or heat from energy.</p>	<p>Heat from waste should not be called recycling at all in the Waste Core Strategy as heat from waste, incineration, gasification and pyrolysis have I believe an unacceptable risk of airborne pollution. Heat from waste is heat from waste. Recycling is recycling. Don't mix them up.</p>	<p>Not accepted - these objections appear to have misread the terms used.</p>	<p>No change proposed.</p>

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22942 22943 22945 23018 23019 (10192)	Support	Peel Environmental Ltd / National Grid / Nottingham Friends of the Earth / Sport England / Browtove Borough Council	No comments to make or expressing general support for the plan. Some asking to be kept informed and consulted on future stages/subsequent documents.		Support noted.	n/a

Chapter 2

22886 (10177)	Object	Ashfield District Council	The Core Strategy (CS) addresses to some extent Ashfield's concern over the lack of identified links to other policies and legislation. Part 2 of the CS sets out the policy context including European, National, and regional policy guidance, together with the local position. However, it does not really explain the link to the legislative background other than through notes within the document to specific regulations.	Provide greater detail on legislative background.	Not accepted - this information is already available within the background papers and the Councils feel that an appropriate balance has to be struck between providing a meaningful and concise context for the Waste Core Strategy or overloading the introductory text with a comprehensive list of legislation. The key policy and legislative issues which underpin the strategy are clearly identified within this section and no further change is felt necessary.	No change proposed.
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Fig 2.1

23022 (10171)	Object	Sneinton Tenants and Residents Association (STARA)	'Energy Recovery' is not a preferred waste management method of the EU as shown by the pyramid on Page 12 fig 2.2. Also 2.4 indicates that recyclable waste cannot be put into incinerators which does not mean if there is insufficient recycling capacity. It therefore needs to be removed from the preferred list of options in every single paragraph it appears.	Remove reference to energy recovery from Fig. 2.2.	Not accepted - energy recovery is a recognised part of the waste hierarchy within the 'recovery' category (as shown in Fig 2.1). This is clearly stated within the National Waste Strategy and the subsequent Defra Review of Waste Policies carried out in 2011. Both documents also make clear that the Government considers that all parts of the waste hierarchy have a role to play in sustainable waste management. The change sought by this objection would therefore result in the Waste Core Strategy being unsound as it would not be in line with national policy.	No change proposed.
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Para 2.5						
22881 (10172)	Object	People Against Incineration (PAIN)	Paragraph 2.5 - it is incorrect to state there are no formal targets for other wastes as there are statutory packaging recycling targets which should be referenced.	Add a paragraph to the 'National' subsection which adequately explains the statutory packaging recycling targets.	Accepted –paragraph will be amended to reflect these targets.	Amend paragraph to reflect packaging targets.
Para 2.8						
22847 (10178)	Object	Natural England	Bearing in mind that the National Planning Policy Framework (NPPF) has been published during the consultation period, we expect that the Council will make changes to this Waste Core Strategy to ensure compliance with the NPPF. If or when a draft Local Plan is produced then Natural England would welcome the opportunity to comment on it.		Accepted - this text will need to be updated to reflect that the NPPF is now in place. A related change will also be made to insert the recommended model policy on the presumption in favour of sustainable development.	Update paragraph 2.8 to note the NPPF is now in place and identify those elements of the NPPF which are relevant to waste. Move existing text on PPS10 within paragraph 2.8 to a separate paragraph. Insert a new policy to reflect the NPPF presumption in favour of sustainable development.
Para 2.10						
22882 (10173)	Object	People Against Incineration (PAIN)	Paragraph 2.10 - It is not justified to state that the East Midlands Regional Plan estimates reflect new waste management capacity that "is likely to be needed". Circumstances have changed significantly since the EMRP was published and new information should be taken into account in relation to anticipated annual rates of waste to be managed and the pattern of waste management facilities, as per Paragraph 14 of PPS10. Municipal Solid Waste arisings have fallen considerably since the Regional Spatial Strategy was adopted and this is unlikely to be caused by the recession alone and this trend is unlikely to be reversed if and when the economy recovers.	Paragraph 2.10 should be updated to read: "...This included specific estimates regarding the minimum level of new waste management capacity, by type, that had been thought at the time as likely to be needed within each waste planning authority area. Subsequent to these estimates having been adopted, circumstances have changed significantly and there is important new information to take into account, and as such it is necessary to revise the annual rates of waste to be managed."	Not accepted - until such time as the East Midlands Regional Plan is revoked, the Councils are obliged to demonstrate how the Waste Core Strategy would meet its requirements. This is set out in Paragraph 4.26 but in tandem with this, subsequent paragraphs look at how circumstances have changed since the Regional Plan, and use a more recent assessment of the available waste data to estimate future requirements. The Councils therefore consider that this objection has been addressed and no further change is necessary.	No change proposed.

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Para 2.17						
22812 22884 (10176)	Object	Environment Agency / PAIN	The description of the Environment Agency's role within the 'Waste – who does what?' section is inaccurate and should be re-worded.	Both PAIN and the Environment Agency have suggested alternative detailed wordings for the last two sentences of the final paragraph of this section.	Accepted - the purpose of this section is to provide a general understanding of the role of the different bodies involved in waste. Two different wording changes have been suggested and it is proposed to insert the Environment Agency's preferred wording as this is felt to address both objections.	Replace existing text with Environment Agency's suggested wording.
22883 (10174)	Object	People Against Incineration (PAIN)	Inset: 'Waste - who does what?' (Page 15, following Paragraph 2.17) It is incorrect to say that local councils (district and unitary councils) are only responsible for collecting municipal waste. Some local authorities collect trade waste, so it cannot be justified to imply that only private companies collect trade waste. Left uncorrected, the statement could result in double-counting. These sentences should be replaced with: "Local authorities (district and unitary councils) are only responsible for collecting municipal waste. Other waste is either collected by local authorities as trade waste or collected and managed by private sector companies..."	These sentences should be replaced with: "Local authorities (district and unitary councils) are only responsible for collecting municipal waste. Other waste is either collected by local authorities as trade waste or collected and managed by private sector companies..."	Not accepted - the term municipal waste includes trade waste and is therefore an accurate description.	No change proposed.
Chapter 3						
Para 3.4						
21664 (10112)	Support	Inland Waterways Association	Support the use of waterborne freight transport as a sustainable alternative to road transport		Support noted.	n/a

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<i>Plan 2</i>						
23007 (10209)	Object	Mr J Potter	The mapping is too schematic.		Not accepted – the mapping is intentionally schematic as this is a Core Strategy document which does not allocate sites.	No change proposed
22856 (10113)	Object	Natural England	Natural England disagree with the assessment that it would be impractical and inappropriate to reproduce all of the statutory sites on the key diagram, we consider it to be of importance that Sites of Special Scientific Interest (SSSI), in particular, are identified as strategic constraints at this strategic level. You will note that SSSIs are specifically referenced in the NPPF (pages 4, 27 and 28). For a good example of a key diagram that includes SSSIs as strategic constraints please see the key diagram on page vii of the glossary of Cumbria County Councils Minerals and Waste Core Strategy.	Show all SSSIs in County/City on Key diagram	<p>Not accepted - the Councils do not consider it practical to show SSSIs on the key diagram given the extensive number of these within the plan area. Cartographically, it would be very difficult to show more than 60 separate sites on a schematic diagram that does not have an OS base. This may be a possibility at an individual District/Borough level but the Waste Core Strategy covers a much larger geographic area. Paragraph 157 of the National Planning Policy Framework states that key diagrams should indicate broad locations for development and therefore it is not considered necessary or appropriate to show SSSIs on the key diagram. The Waste Core Strategy is setting out broad principles and broad locations but is not site-specific and therefore it is not necessary to identify detailed constraints on this diagram. The SAC at Sherwood Forest is shown as it covers a wider area.</p> <p>The SSSIs within Nottinghamshire and Nottingham are mapped in the Sustainability Appraisal Report/Scoping report and an up to date GIS layer of SSSI boundaries is maintained by both authorities for the purpose of identifying potential constraints and to trigger consultation with Natural England.</p> <p>This approach does not diminish the protection that should be given to SSSIs and their importance in decision making. Policy WCS12 on environmental protection, in combination with saved Waste Local Plan policy W23, will serve to protect SSSIs and other important nature conservation designations.</p>	No change proposed.

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Chapter 4

22814 (10216)	Object	Environment Agency	We note that some of the statistics in this section have been fully referenced to a source and specific data set. We consider that it would be beneficial to apply this to all of the statistics in this section. This would make it easier to follow how figures are derived where our data has been used. We appreciate that some estimates may be based on more than one source or data set. We would be happy to review statistics based on our data with the authors of this document.	Include additional source referencing for data used in Chapter 4.	The need to reference all sources is accepted.	Direct reference to sources will be included where relevant.
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Para 4.2						
22887 (10254)	Object	People Against Incineration (PAIN)	<p>Paragraph 4.2 - inflated waste arisings projections have been the subject of numerous detailed PAIN submissions. The EMRA Waste Data Monitoring Report (February 2007) recognised that: "...since 2003, there has been a marked departure from the steady historical upward trend" (Para 6.2). This decline predates both recessions and there is no evidence to show that waste arisings in Nottingham and Nottinghamshire (excluding waste from collieries and power stations) ever reached 4 million tonnes a year.</p> <p>The paragraph needs to be re-worded to better distinguish between the discrepancy associated with the projection and the actual fall in waste arisings.</p>	<p>The second sentence should be replaced with: "This is significantly below our previous estimated projection of around 4 million tonnes a year."</p> <p>The third sentence should be replaced with: "This discrepancy is caused by reliance on out-of-date waste projections that assumed higher waste arisings than subsequently occurred."</p> <p>Further sentences should be added, as follows: "Recent arisings figures could be lower due to the recession which has affected consumer spending, manufacturing, and construction especially, but there has been a general downward trend in waste arisings that predates the recession. This general trend is due in part to growing waste awareness and to increased resource efficiency amongst waste producers and to the success of the landfill tax and other policy and legislative drivers. Defra's June 2011 Economics of Waste and Waste Policy report states that the national downward trend in arisings since 2003 points to some potential decoupling of waste from economic growth, and calls into question the value of using expenditure as the driving factor in forecasting waste arisings".</p>	Not accepted - this figure is based on published data from the Environment Agency and Defra.	No change proposed.

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Para 4.5						
22816 (10217)	Object	Environment Agency	There is suggestion here that 'very little information on how much waste originated here and how much of our waste is landfilled outside the county'. We believe that our data could be used to derive some estimates for this, using origin and destination fields (of our waste data interrogator). We would advise that such estimations are included in the text.	Include estimates for commercial and industrial waste landfilled outside Nottinghamshire and Nottingham using Environment Agency data.	Partially accepted - The Environment Agency data includes headline information on imports and exports although the exact waste source and original is not recorded in all cases. The Councils have worked with the Environment Agency to develop a method of proportioning the waste data to derive a more detailed estimate of waste movements. It is considered that it would be more appropriate for this data to be contained with an evidence paper, rather than the Core Strategy itself, due to the complexity of the data.	No change proposed - the Environment Agency data will be included in an evidence paper setting out the details of waste imports and exports, where known.
22888 (10252)	Object	People Against Incineration (PAIN)	<p>Further efforts are needed to account for cross-border waste movements and reductions in waste landfilled.</p> <p>Whilst it is possible that 300,000 tonnes of C&I waste was indeed landfilled in 2009, by 2010 this fell to 200,000 tonnes, presumably due to better access to the Erin site (Derbyshire) and the increase in landfill tax.</p> <p>It is worth noting that waste flows repeated between Nottinghamshire and Derbyshire are most likely due to the road network crossing the M1, and that some of Nottinghamshire's waste appears to have been taken into Derbyshire via waste transfer stations before returning to Nottinghamshire.</p>	Further efforts are needed to more accurately account both for cross-border movements of waste and for reductions in waste landfilled in order to arrive at justifiable figures. Such efforts should include closer scrutiny of data sources, and better coordination with neighbouring Waste Disposal Authorities, e.g. Derbyshire.	Partially accepted - the headline data on waste movements is very limited as not all waste movements are recorded in full. A significant proportion of the available waste data does not record the origin or final destination of waste. This may therefore only be traceable to the regional level or may even be unrecorded. It is not therefore possible to produce a full breakdown of waste movements. However the Councils have worked closely with the Environment Agency and neighbouring Waste Planning Authorities to develop a method of proportioning the waste data to derive a more detailed estimate of waste movements and identify key facilities.	No change proposed - the Environment Agency data will be included in an evidence paper setting out the details of waste imports and exports, where known.

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22933 (10255)	Object	Derek Kitson Architectural Technologist Ltd	Commercial and industrial waste also includes food waste from shops, butchers and large supermarkets. There is no guidance or proactive policy for this sector of the market which if handled correctly does make a significant reduction to landfill. There should be a mention of this type of facility and its selected locations.	References to appropriate facilities and treatment should be included within policies and supporting text.	Partially accepted – Policy WCS6 covers treatment facilities for all waste streams and detailed policy guidance would be a matter for the subsequent development management policies. Not all processing facilities would be classified as waste management facilities as meat rendering plants, for example, are an industrial process which is managed by district/borough councils. However, it is accepted that a reference to food waste and animal by-products would be relevant here and this will be added to the text.	Expand paragraph 4.5 to refer to food waste from this sector and animal by-products.
Para 4.6						
22817 (10218)	Object	Environment Agency	It looks like the disposal figure for inert construction and demolition waste of 230,000 tonnes is for the year 2010, not 2009 (if indeed it has been taken from our website "East Midlands Landfill Inputs 2010")	Amend date shown in penultimate sentence of paragraph 4.6 to 2010 instead of 2009.	Accepted – text will be amended accordingly.	Amend date shown in penultimate sentence of paragraph 4.6 to 2010 instead of 2009.
23012 (10256)	Object	Mr J Potter	The littering of construction and demolition waste on land is very displeasing as it degrades soil quality (which has implications for food production).	A policy that discourages the strewing of construction and demolition waste on sites should be introduced. The plan should also include non-invasive ideas to tackle fly tipping.	Partially accepted - the specific regulation and control of fly-tipping is the responsibility of several agencies and will rely on wider actions such as whether Household Waste Recycling Centres can accept trade waste. It would be difficult to construct a planning policy to tackle this specifically. However the purpose of the Waste Core Strategy is to ensure the provision of sufficient facilities, appropriately located to encourage the sustainable management of waste. A reference will be added to paragraph 5.9 to recognise the issue of fly-tipping. This would be in line with the Waste Core Strategy's strategic objectives on caring for our environment and community well-being.	Add reference to fly-tipping in paragraph 5.9.

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Para 4.8						
22934 (10284)	Object	Derek Kitson Architectural Technologist Ltd	There is a small amount of agricultural waste produced from carcasses and fallen stock. Disposal is usually via incineration, rendering or through the animal by-products industry. Support or at least a proactive approach to disposal points should be included.	Add policy/supporting text on treatment/disposal facilities for animal waste.	Partially accepted – additional text is proposed for paragraph 4.8 to highlight the production of animal waste and recognise the need for appropriate facilities for this waste stream. However a specific policy is not considered necessary as Policy WCS6 covers treatment facilities for all waste streams and detailed policy guidance would be a matter for the subsequent development management policies. Not all processing facilities would be classified as waste management facilities as meat rendering plants, for example, are an industrial process which is managed by district/borough councils.	Add additional text to paragraph 4.8 to cover production of animal waste and relevant treatment/ disposal facilities.
Para 4.9						
22818 (10219)	Object	Environment Agency	Paragraph 4.9 Clinical waste - Based on our Hazardous Waste Interrogator for 2010, we estimate a total of over 3,500 of hazardous clinical waste being produced in Nottinghamshire and 4600 tonnes being imported into the county. As these figures do not include non-Hazardous clinical waste, we believe that the figures in the document underestimate the situation.	Amend clinical waste arisings estimates in paragraph 4.9 from 3,000 tonnes per annum to 3,500 tonnes and estimated imports from 4,000 tonnes per annum to 4,600 tonnes.	Accepted - technical amendment	Amend clinical waste arisings estimates in paragraph 4.9 from 3,000 tonnes per annum to 3,500 tonnes and estimated imports from 4,000 tonnes per annum to 4,600 tonnes.
Para 4.11						
22748 (10253)	Object	Northamptonshire County Council	Para 4.11 - the facility at King's Cliffe (Northamptonshire) only has a temporary permission until 2013 and should not be mentioned in the text.	Remove reference to King's Cliffe.	Not accepted - the Councils' understanding is that the Waste Core Strategy should demonstrate awareness of relevant capacity outside its immediate area so that the wider context is understood. Omitting references to significant facilities is therefore likely to be unsound. It would however be appropriate to clarify within the text that it is currently uncertain whether the site at King's Cliffe will continue beyond 2013. Hazardous waste is also exported from the plan area to a disposal site near Peterborough and the text will be updated accordingly.	Amend text to clarify uncertainty over long term situation at King's Cliffe facility and include reference to other hazardous landfill sites.

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<i>What is our existing waste management capacity?</i>						
22376 (10180)	Support	Waste Recycling Group	The Eastcroft incinerator currently has an environmental permit which limits the combined waste disposal capacity for lines 1 and 2 to 160Ktpa. A permit variation has been submitted to the EA to increase the permitted capacity of lines 1 and 2 to 200Ktpa and this has been through determination and a draft permit has been prepared and will soon be issued for public consultation prior to being formally issued.	n/a	Support noted.	n/a
22794 (10257)	Object	CPRE (Notts Branch)	Construction and demolition part of this topic is confusing. It would be clearer if the on-site element was removed and only the tonnage presented for treatment dealt with in the estimates.	Remove on-site element from estimates.	Not accepted - the reference to on-site management of waste, and that this reduces the demand for treatment facilities, is regarded as appropriate.	No change proposed.
22894 (10264)	Object	People Against Incineration (PAIN)	The statement that commercial and industrial waste accounts for around two thirds of the waste landfilled in the plan area is inaccurate and should be amended. The national trend shows that roughly the same quantities of C&I waste and MSW are landfilled and no robust evidence is provided to demonstrate that this national trend is not replicated in Nottinghamshire and Nottingham.	Replace statement with: "Commercial and industrial waste accounts for around half of the waste that is disposed of in our remaining non-hazardous landfill sites...", and adjust the figures for C&I waste arising accordingly, i.e. reduce to roughly the same as MSW. The statement that "Nottinghamshire and Nottingham's commercial and industrial waste that is not recycled or sent elsewhere for energy recovery, is therefore landfilled" should be evidenced or removed.	Not accepted - this is based on the latest available Environment Agency disposal data for Nottinghamshire and Nottingham.	No change proposed.

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Para 4.14						
22819 (10259)	Object	Environment Agency	Paragraph 4.14 Municipal waste - It is stated that the estimated recycling and composting capacity for municipal waste is 300,000 tonnes a year. This is not consistent with table 1 (on page 29), which suggests that the estimated capacity for recycling alone is 300,000 tonnes a year. Our data suggests that there are only four permitted composting sites currently in the county, suggesting that the number of sites (and capacity) mentioned in the text may include exempt sites and those that are close to Nottinghamshire but in neighbouring counties.	Clarify and amend discrepancy between the recycling and composting totals shown in paragraph 4.14 and Table 1.	Partially Accepted - the discrepancy with the recycling totals in Table 1 is noted and the table sub-headings will be amended to make clear that the following figures are a breakdown of the overall recycling total. The number of composting sites within the county reflects the sites which have planning permission.	Amend Table 1 recycling headings to clarify totals and sub-totals.
Para 4.16						
22680 (10220)	Object	Leicestershire County Council	Paragraph 4.16 - Shepshed facility is subject to an appeal, not legal proceedings.	Amend reference in paragraph 4.16 to clarify Shepshed facility subject to appeal.	Accepted – N.B. the status of this application has changed since the representation was made as the appeal was allowed in June 2012.	Amend reference in paragraph 4.16 to clarify the latest status of the Shepshed facility.
22811 (10258)	Object	Lincolnshire County Council	Paragraph 4.16 (last sentence). Lincolnshire County Council is uncertain as to whether the mention of the proposed 150,000 tonne EFW facility in Lincoln has been included in this section to show that there may be spare capacity at this facility? For information: The Lincoln EFW facility will have no spare capacity as it will be dealing with all the residual municipal waste arisings from Lincoln and surrounding Districts.		Not accepted- in order to produce a sound plan the Councils must demonstrate awareness of significant neighbouring facilities as the plan should not be prepared in a vacuum. This section of the Waste Core Strategy is setting out the broad context and references to other facilities that make up the wider waste management context are therefore considered appropriate. The comments about capacity are noted but it should be stressed that a reference in this context does not imply that the Core Strategy is seeking to use this capacity.	No change proposed.

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22889 (10260)	Object	People Against Incineration (PAIN)	<p>This should acknowledge that Eastcroft can already handle up to 200,000 tonnes per annum if an Environmental Permit is approved.</p> <p>The permission for the third line places no restriction on the source of waste which could comprise municipal and/or business waste. If granted, the environmental permit would give the Eastcroft facility a maximum capacity of 300,000 tpa upon completion of the third line.</p> <p>WRG's earlier consultation response that Eastcroft could expand further with a 4th line up to 400,000 tpa should be reflected but not in a way that endorses an increase in incineration capacity.</p>	<p>The first sentence should be replaced by the following sentences: "The existing incinerator at Eastcroft, in Nottingham, currently takes up to 160,000 tonnes of municipal and C&I waste a year. As the result of refurbishment the Eastcroft facility can now handle more waste than this, and WasteNotts have therefore applied to increase the permitted incineration capacity of the two existing lines to 200,000 tonnes. WasteNotts has also received planning permission for a third 100,000 tonne line and has applied for a permit to accept up to 300,000 tonnes of waste a year. WasteNotts have also stated that Eastcroft could expand further with a fourth line, but have yet to apply for planning permission or an environmental permit." The following sentence should also be added: "The 120,000 tonne per annum Kirk Sandall (Doncaster) incinerator has received planning permission, and is not subject to legal proceedings."</p>	<p>Partially accepted - a factual amendment will be made if an Environmental Permit is approved for Eastcroft. A reference to the facility in Doncaster will be added to paragraph 4.20. However, it is only considered appropriate to refer to facilities which are operational or have a valid planning permission. Many landowners, developers or operators may have aspirations to expand existing facilities but this does not necessarily mean they would be suitable in all cases. For this reason it is considered that this potential capacity cannot be relied in estimating future needs and is a matter for the site-specific document once the broad principles have been established through the Waste Core Strategy.</p>	<p>Consider a factual amendment to paragraph 4.16 if and when necessary. Include a reference to the Doncaster facility in paragraph 4.20.</p>

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Para 4.17						
22890 (10261)	Object	People Against Incineration (PAIN)	<p>Calculations of landfill capacity depend on the assumptions made about waste density. These should be made explicit and/or a range provided that makes uncertainties clear. PAIN advocates using higher density assumptions based on local studies or a minimum density of 1.1-1.34 per m3 as in the Staffordshire and Stoke-On-Trent Waste Local Plan Inspector's Report.</p> <p>Details of anticipated quantities of inert waste or landscaping should also be included. The Rufford Inspector's view was that evidence to show void space in Nottinghamshire is running out was not persuasive and that there is substantial capacity in Derbyshire.</p>	<p>The second sentence should begin: "At the end of 2010 there was sufficient capacity for around 4.7 million m3, or approximately 4 million - 6.3 million tonnes..."</p> <p>Additionally, mention should be made of the use of inert material for landscaping, and an estimate of the quantities of material involved should be included.</p>	Not accepted - the landfill density conversion factor is drawn from that in the PPS10 companion guide and has been agreed with the Environment Agency.	No change proposed.
Para 4.18						
22891 (10262)	Object	People Against Incineration (PAIN)	<p>PAIN would like to see better use of HWRCs for C&I recycling in line with Government aims set out in the June 2011 Review of Waste Policy and Defra's March 2012 report Red Tape Challenge</p> <p>A smaller number of reuse parks could be 'supplied' by material brought to HWRCs.</p>	<p>The quoted sentence should be replaced with: "Trade waste is not currently accepted at the City or County's HWRC sites but the Government is encouraging local authorities to accept business (SME) waste at HWRCs and other bring bank recycling facilities."</p> <p>Alternatively, it could be replaced with: "Trade waste is not currently accepted at the City or County's HWRC sites, but the Waste Authorities intend for business (SME) waste at HWRCs and bring bank recycling facilities to be accepted at an affordable cost to the business user where practicable."</p>	Accepted - paragraph 4.18 will be amended accordingly.	Amend first sentence to clarify that Government is encouraging local authorities to look at ways of helping to deal with trade waste.

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Para 4.20

22892 (10263)	Object	People Against Incineration (PAIN)	Paragraph 4.20 - Eastcroft Incinerator is currently permitted to burn C&I waste even without the extension, and it would be misleading to overlook the growing capacity for burning waste wood and mixed commercial and industrial waste (directly, or in the form of RDF). Note: References to possible waste incineration capacity should be worded carefully so that statements cannot be misinterpreted as endorsing increased waste incineration.	This paragraph should be replaced with: "There are currently no energy recovery facilities dedicated to processing mixed commercial and industrial waste within the plan area. However, the Eastcroft Incinerator in Nottingham can currently accept mixed commercial and industrial waste. It is anticipated that as Nottingham and Nottinghamshire reduce residual municipal waste arisings a greater proportion of the existing Eastcroft capacity will be available for C&I waste. Furthermore, Eastcroft's overall capacity for waste is expected to increase and this could allow for even more C&I waste to be incinerated at Eastcroft (see Paragraph 4.16, above). There is also existing capacity at the Sheffield incinerator which is licensed to take some commercial and industrial waste. Furthermore, there are also proposals for the introduction of waste wood incinerators both within and around the strategy area, as well as the prospect of using capacity at other existing and emerging incinerators, including gasification facilities designed to process Refuse Derived Fuels (RDF)."	Partially accepted - existing text already recognises capacity at Eastcroft and Sheffield but additional text will be inserted to refer to those facilities which recover energy from wood waste	Insert reference to facilities which recover energy from wood waste.
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Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
22935 (10265)	Object	Derek Kitson Architectural Technologist Ltd	Paragraph 4.20 does not make sense. It suggests Eastcroft Incinerator in Nottingham could take up to 100,000 tonnes a year in the future but this falls way short of the predicted 300,000 tonnes in table 5. This appears to leave a lot of waste to be incinerated at possible future small-scale incineration plants which are not identified. The last sentence suggests that the only other potential capacity is at Sheffield. This does not fit well with the vision of sustainable development and transport and is akin to a "suck it and see" exercise.		Not accepted - this text highlights known capacity and Table 5 gives an indicative estimate of the capacity that might be required. The purpose of the Waste Core Strategy is to make policy provision to meet likely future requirements/address anticipated shortfalls and hence it is appropriate to highlight this possible deficit within the text. This sets the context for the subsequent policies which look at how/where new capacity could be provided. There is no suggestion within the text that this should be met by several smaller facilities as the Waste Core Strategy maintains a flexible approach as to the size and type of energy recovery facilities that may be appropriate as detailed in Policy WCS6.	No change proposed.
Table 1						
22714 (10266)	Object	Leicestershire County Council	Recycling totals and/or sub-totals within Table 1 should be made clearer as they appear to show double counting.	Clarify recycling totals in Table 1 by adding a row named 'Total Recycling' and an explanatory note of how totals calculated.	Accepted - this will be clarified.	Amend headings/sub-headings to clarify totals.
22895 (10267)	Object	People Against Incineration (PAIN)	Table 1 should be updated and accompanied by a list of all the sites and their treatment capacities and an explanation of how they correlate to the summary table and the categories and methodologies used. This should also make clear where facilities can handle more than one waste stream. Data from adjacent waste authorities should be provided. More justification of the source data is needed to enable independent verification. The data shown in the evidence for the Mansfield MRF plant is inaccurate.	Produce an explanatory that lists all of the sites, their treatment capacities by waste type and stream, how they correlate to the summary, and the categories used and methodologies employed, e.g. to apportion waste to each category. Update Table 1 using the latest available data and show where facilities can handle more than one waste stream (e.g. municipal and C&I). Provide data from adjacent Waste Authorities. Give justification and sources to support the figures used in Table 1. Show correlation between the figures in the "Existing Waste Management Sites in Nottinghamshire and Nottingham" background document and the Table 1 summary.	Not accepted - this information is provided as background evidence and is considered too detailed for the purposes of the Waste Core Strategy.	No change proposed.

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
Para 4.26						
22793 (10181)	Support	CPRE (Notts Branch)	Support the adoption of the 'best case scenario' for waste arisings.		Support noted.	n/a
Table 3						
22896 (10269)	Object	People Against Incineration (PAIN)	The anticipated waste levels are inaccurate and should be revised downwards to 2.4 million overall (excluding power station ash). The EMRP did not set out best and worst case scenarios but referred to a number of potential scenarios and includes a range of estimates based on data that pre-dates more recent commercial and legislative drivers. Neither does it 'expect' the capacity shown in Tables 2 and 4 to be provided if annual monitoring suggests the estimates are inaccurate. Actual waste arisings have continued to depart from the previous upward trend.	Anticipated waste levels should be revised down to a maximum of 560 ktpa for municipal, 900 ktpa for C&I waste, and 940 ktpa for C&D, i.e. no more than 1.5 million tonnes of HIC per year and 2.4 million overall (excluding power station ash).	Not accepted - the figures quoted in the objection are estimated current arisings whereas the Waste Core Strategy must look ahead over the life of the plan. It would be irresponsible for the strategy not to consider the possibility of future growth, especially in the current circumstances. PAIN express a hope to see waste arisings continue to fall, which is shared by the Councils, but this is not a substantive basis on which to produce a sound plan that has sufficient flexibility to cope with a range of possible outcomes. The strategy must take account of published growth figures for housing and employment alongside possible economic changes over the life of the plan. Future monitoring and review work will help to inform whether adjustments to the strategy are needed in due course.	No change proposed.
22897 (10272)	Object	People Against Incineration (PAIN)	The Estimates in Table 3 have already been proved wrong by subsequent waste arisings data. Table 3 should be updated with more accurate and current estimates, taking account of national policy and actual trends. The worst case scenario should reflect a no-growth situation held at around the 2009 level. Paragraphs 4.28 - 4.35 should then be updated to reflect these changes as appropriate. There is no evidence to support the growth assumptions made in the RPS study referred to in paragraph 4.28.	Replace or supplement estimates contained within Table 3 with more accurate and current estimates, which take account of national policy and actual trends. As a worst case scenario this should reflect a no-growth situation, with waste arisings held at around the 2009 level (i.e. 560 ktpa municipal waste, 900ktpa C&I and 940ktpa C&D waste for 2015, 2020 and 2025 across the plan area). Update other paragraphs, e.g. 4.28 - 4.35, to reflect these changes as appropriate.	Not accepted - the Councils do not accept this assessment as it relies on one possible view of future waste arisings and takes no account of economic recovery or possible future growth.	No change proposed.

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
Para 4.29						
22898 (10274)	Object	People Against Incineration (PAIN)	Paragraph 4.29 and Table 4. There is no requirement to meet the outdated estimates of capacity shown in the EMRP and reproduced in Table 4 as there have been significant changes and new information since the EMRP was published. The Waste Core Strategy should, instead, be based on an up to date, objective assessment of need and show how this could best be met in accordance with the waste hierarchy.	Make clear that there is no requirement to provide the level of capacity that would be sufficient to meet the outdated projections contained within the EMRP. Instead, the document should clearly indicate the anticipated capacity based on an up-to-date objective assessment of need, and how this could best be met in accordance with the waste hierarchy. Update other paragraphs, e.g. 4.29 - 4.35, to reflect these changes as appropriate.	Not accepted - until such time as it is revoked the Regional Plan remains part of the statutory development framework and the Waste Core Strategy must demonstrate how those requirements could be met. The Councils are aware of the need for regular monitoring and review and have therefore presented an alternative, updated assessment at Table 3. In the absence of any other published, audited data this is the most up to date estimate/assessment that can be provided.	No change proposed.
Table 4						
22795 (10273)	Object	CPRE (Notts Branch)	Inconsistencies in Tables 1 to 4 are confusing. How does 'Compost' creep into the figures for Construction and Demolition in Table 4 but not in any other table? If there is no identified demand for more capacity, should this not be shown in Table 4 by reducing the numbers for construction and demolition capacity?	Table 4 - clarify reference to compost and reduce estimate for construction and demolition waste capacity requirements.	Accepted - the headings within the table are drawn from those in the Regional Plan. However it is agreed that it is potentially confusing as this waste stream could not realistically be composted.	Remove reference to compost under construction and demolition category in Table 4.

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Para 4.30						
22796 (10268)	Object	CPRE (Notts Branch)	It would be more useful if green garden waste and composting capacity were considered separately as it is very likely that they would offer different problems, solutions and opportunities to other elements of municipal waste.	Separate out references to green garden waste within municipal waste.	Not accepted - the estimates used within the Waste Core Strategy are headline figures. Estimating exact future requirements is not an exact science and there is therefore a wish to avoid being overly prescriptive and giving a false impression of accuracy by breaking down the available data by individual material types. Existing data on composition is reasonably good for municipal waste but it would be difficult to provide a comparative estimate for commercial and industrial waste due to the lack of recent survey data. Given the lack of substantive waste data, the Councils feel that the priority is therefore to make an appropriate level of overall recycling/composting provision whilst allowing flexibility over the exact proportions of this.	No change proposed.
Para 4.32						
22899 (10270)	Object	People Against Incineration (PAIN)	Paragraph 4.32 The density assumptions used should be made explicit as 1 million tonnes of non-hazardous waste per year would not necessarily equate to more than 20 million m3 of void space depending on assumptions made about waste density and settlement.	Make density assumptions explicit.	Not accepted - the text in paragraph 4.32 makes clear that this figure is based on the estimated requirements set out in the East Midlands Regional Plan, not local estimates.	No change proposed.

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
Para 4.35						
22900 (10271)	Object	People Against Incineration (PAIN)	Paragraph 4.35 The word 'this' in the first sentence should make clear that it refers to the policy target to increase recycling or composting of all waste to 70% by 2025. The waste management terms used should be clarified within the text and not just in the glossary. It needs to make clear whether the term 'energy recovery' includes anaerobic digestion. Reference to 'the possibility of additional energy recovery capacity' should be deleted.	Clarify that the word "this" means a policy target to increase recycling or composting of all waste to 70% by 2025. The phrase "recycling capacity" should be followed by "(including anaerobic digestion and composting)". The phrase "and the possibility of additional energy recovery capacity" should be removed altogether. If not, the Submission Document should clarify whether or not anaerobic digestion (AD) and mechanical and biological treatment (MBT), etc. are included as types of "energy recovery" in this context, e.g. by referring to the Glossary. This change is also relevant to Chapter 7, including WCS2.	Partially accepted - the word 'target' will be inserted after 'this' to clarify this point. Including detailed definitions within the text is not considered appropriate.	No change proposed.
Plan 3						
23008 (10213)	Object	Mr J Potter	The mapping is too schematic		Not accepted - key diagrams are schematic	No change proposed.

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
Chapter 5						
<i>Delivering sustainable waste management</i>						
22860 (10228)	Object	Express Energy	National guidance strongly supports renewable/low carbon energy sources, including energy from waste. It does not place limits on this and encourages the market to bring forward facilities at the right time, in the right place. Local policy should be sufficiently flexible to achieve this. The indicative requirements in Tables 5 and 6 are therefore potentially misleading as they imply maximum targets for recycling or energy recovery. Policy WCS2 should be read without reference to these tables, leading to a presumption in favour of energy recovery capacity being developed where this would enable the diversion of waste from landfill.	<p>It should be made clear within the accompanying text that the figures for recycling and energy recovery are not targets or maxima relating to the provision of new facilities and that Policy WCS2 is properly read without reference to the figures set out therein. Hence there will be a presumption in favour of energy recovery capacity being developed where this would result in the diversion of waste from landfill.</p> <p>The following changes are therefore proposed: Delete all wording from paragraph 7.13 after the words "... flexibility in our approach" and delete paragraph 7.14. Replace with: "The indicative requirements set out in Table 5 do not represent maximum additional capacity requirements. New waste treatment facilities will be permitted where they would contribute towards the diversion of waste that would otherwise need to be disposed of, would assist in encouraging competitiveness and would be consistent with the presumption in favour of facilities that are higher up the waste hierarchy."</p>	Not accepted - the figures shown are clearly represented as indicative. Local Development Frameworks, and Core Strategies in particular, are expected to set out the level of development provision that is needed so that this is transparent to local communities and developers. Tables 5 and 6 are therefore intended to illustrate the likely requirements over the life of the Waste Core Strategy although this will be subject to regular monitoring and review.	No change proposed.
22994 22995 22996 (10186)	Support	Peel Environmental Ltd	Support for various references to energy recovery and flexibility within paragraphs 7.10/7.11/7.13.		Support noted.	n/a

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
Para 5.3						
22924 (10194)	Object	Ashfield District Council	Ashfield District Council's response placed an emphasis on the need for a partnership approach. This is recognised in para 5.3 on the challenges and within the supporting text to Policy WCS1 and WCS2. However, there is limited information on how this will be taken forward and achieved.	Provide additional detail on proposed partnership approach.	Not accepted - there is a description of the initiatives the Councils are, and would be, engaged in within Chapters 5,7 & 8 of the Plan. It is not necessary for the Waste Core Strategy to provide further details of the initiatives mentioned here.	No change proposed
Para 5.4						
22901 (10250)	Object	People Against Incineration (PAIN)	The 5 million tonne figure has not been justified. PAIN has supplied evidence in this and previous submissions to support the notion that an estimate of a maximum of 1.5 million tonnes of HIC and 2.4 million overall (excluding power station ash) by 2030/31 is justified, and that anything greater would be unreasonable. Planning for over-capacity is neither effective nor consistent with national policy.	Replace "an estimated 5 million tonnes of waste by 2030/31" with "a maximum of around 1.5 million tonnes of waste by 2030/31 (excluding C&D waste and power station ash)"; or: "a maximum of around 2.4 million tonnes of waste by 2030/31 (including MSW, C&I and C&D waste, but excluding power station ash)".	Not accepted - this is considered to be the best estimate in the light of the available data. PAIN's preferred figure is based on estimated current arisings, during a period of prolonged recession, and makes no allowance for potential future growth. Previous estimates have already been revised downwards in the light of the latest evidence but, even taking account of possible behavioural changes and greater waste awareness; it would be unsound for the Waste Core Strategy to ignore the possibility of future growth.	No change proposed.
22929 (10196)	Object	Ashfield District Council	Energy recovery and "Disposal" need to be better defined, so that these can be measured, monitored and managed.	The WCS should use a lower initial growth figure with a policy which allows the overall assumptions for growth to be amended over time to reflect the latest evidence.	Not accepted: The weight of evidence the Councils have identified would not support this representation. Adopting lower growth figures would introduce higher risk to the delivery of waste processing provision. A review of growth assumptions, should it be necessary is the appropriate action, an amendment to policies is not possible within the legislative framework.	No change proposed

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
Para 5.5						
22911 (10251)	Object	People Against Incineration (PAIN)	Paragraph 5.5 PAIN disagrees with the estimate that there is less than 8 years of disposal capacity remaining and quote the Rufford Inquiry Inspector's Report which says that evidence about landfill shortages is not persuasive. Alternative landfill capacity is also available over the border at Erin in Derbyshire	"With less than 8 years of non-hazardous and inert disposal capacity remaining" should be "With roughly 15 years of non-hazardous and inert disposal capacity remaining".	Not accepted - remaining landfill capacity has been calculated using the approach recommended with the PPS10 companion guide and in line with Environment Agency guidance.	No change proposed.
Para 5.6						
22912 (10197)	Object	People Against Incineration (PAIN)	The figure of 85,000 new houses is not substantiated. Without detailed information it is impossible to assess the likelihood that this number of new houses will be delivered, and therefore the figure has not been justified.	Provide detail of the 85,000 figure, accompanied by a detailed assessment of the number of new houses that are actually expected to be delivered, historic data about delivery of housing over the past decade, and the number of existing houses to be demolished during the plan period.	Not accepted - the figure of 85,000 new houses is based upon up-to-date evidence provided by local planning authorities (LPAs) on planned levels of housing. While delivery levels are low at present on account of the economy this situation is not expected to continue over the Plan period, LPAs are planning for growth in line with national estimates.	No change proposed
Para 5.13						
22820 (10140)	Object	Environment Agency	Paragraph 5.13 should also recognise that new development must not increase flood risk to others, and look to reduce flood risk where possible. Sustainable drainage design should be utilised within all new development, whilst not increasing Greenfield and reducing brownfield surface water runoff. Development within River Leen and Day Brook catchments must limit surface water runoff to the equivalent Greenfield runoff. Elsewhere, a 30% reduction in existing brownfield surface water runoff rate should be achieved. The vulnerability classification of development should be compatible with the Flood Zone category, in accordance with the National Planning Policy Framework Technical Guidance.	Amend Paragraph 5.13 wording to recognise need to avoid increasing flood risk elsewhere and look to reduce flood risk where possible. Promote sustainable drainage design principles and specific requirements detailed by the Environment Agency for River Leen and Day Brook catchments.	Partially accepted - stating the need to avoid increasing flood risk elsewhere and looking to reduce flood risk where possible would be a helpful addition to the text along with a reference to promoting sustainable drainage design principles. A related change is also proposed to include a further cross reference to sustainable drainage principles with the supporting text to Policy WCS14 on the Design of Waste Management Facilities. However, detailing specific requirements for the River Leen and Day Brook catchments would, be more appropriate for the subsequent development management and site-specific policy documents rather than the Waste core Strategy which is intended as a more overarching, and therefore strategic, document setting out general principles.	Include additional text to highlight the importance of avoiding increasing flood risk elsewhere and looking to reduce flood risk where possible. Include a specific reference to promote sustainable drainage design principles. Include a reference to sustainable drainage principles with the supporting text to Policy WCS14 on the Design of Waste Management Facilities.

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
Para 5.14						
22992 (10138)	Support		Para 5.14 - Peel Environmental Ltd supports the recognition of the potential for energy from waste technologies to offset fossil fuel use.		Support noted.	n/a
23023 (10139)	Object	Sneinton Tenants and Residents Association (STARA)	Paragraph 5.14 - it is misleading to suggest that incinerators are a low carbon or renewable technology.	Replace term energy recovery with incineration and remove reference to this being a low carbon or renewable technology.	<p>Not accepted - the term energy recovery does not solely refer to incineration as suggested by this objection. The term is widely used to cover all possible technologies that recover energy from waste in some form, including anaerobic digestion and mechanical biological treatment. This is made clear within the National Waste Strategy 2007 and recent Defra review of waste policies. In line with national policy, the Waste Core Strategy is technology neutral with respect to the different forms of energy recovery but recognises the preference for anaerobic digestion in relation to managing food and organic waste. The suggested change to replace the term energy recovery with incineration would not therefore be appropriate.</p> <p>The text in Paragraph 5.14 states that some energy recovery technologies have the potential to offset fossil fuel use and are seen as low carbon or renewable technologies. It is therefore recognised that this may not always be the case. The paragraph wording is in accordance with national policy as listed in Footnote 24.</p>	No change proposed.

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Chapter 6						
<i>Vision</i>						
22838 (10122)	Object	Highways Agency	It is disappointing that the Vision has not been updated to make reference to the need to minimise the number of vehicle trips associated with any future waste development, particularly those which impact upon the Strategic Road Network (SRN).	Include specific reference to the need to minimise the number of vehicle trips associated with any future waste development, particularly those which impact upon the SRN.	Accepted - although specific reference to minimising the transport impact of new waste development, and reducing the distance waste is transported, is made within the strategic objective on sustainable transport (SO5); additional text within the Vision would help to set the context for this objective and Policy WCS10.	Re-word the second paragraph of the vision to include a reference to minimising the impact of transporting waste. Add a specific reference to minimising the impact on the strategic road network to SO5.
22873 (10121)	Support	Express Energy	Express Energy supports the wider aims of the Core Strategy pertaining to the establishment of sustainable waste management practices. In particular it supports recognition of the synergy between the objectives of maximising the generation of renewable and low carbon energy and the development of sustainable energy recovery processes; the recognition that disposal needs to be the option of last resort, and the commitment to the development of a more sustainable integrated system of waste management within the County. The recovery of energy from waste exists as one of the best and most proven methods of achieving this switch.		Support noted.	n/a

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22913 (10123)	Object	People Against Incineration (PAIN)	The vision should be sharpened and references to social responsibility, life cycle thinking, the need to avoid incineration over-capacity and the specific role of anaerobic digestion and Mechanical Biological Treatment-landfill should be added amongst others. Consideration should also be given to explicit support for the recycling of absorbent hygiene waste. This is supported by evidence from the EA, the Waste Framework Directive, Waste Regulations 2011 and a number of other quoted sources.	Replace "Together we will be producing less waste" with "Together we will be producing substantially less waste than we produced in 2009". Remove the word "striving". Add the phrase "socially responsible" before the term "waste industry". Add explicit reference to "source segregation of food waste for composting and/or anaerobic digestion". Add an explicit reference to "treating residual waste via MBT-landfill where appropriate". Add an explicit reference to "avoiding incineration over-capacity". Replace: "Disposal will be the last resort once all other options have been exhausted" with: "Disposal will be the last resort once all other options have been exhausted, unless a deviation from the waste hierarchy is justified based on life-cycle thinking on the overall impacts of the generation and management of such waste". Consideration should be given to the inclusion of explicit support for the recycling of absorbent hygiene waste, including disposable nappies, incontinence and feminine hygiene products.	Partially accepted - the inclusion of a baseline date within the vision against which to compare future waste arisings would provide greater consistency with the proposed monitoring framework set out in Chapter 8 of the Waste Core Strategy and both Councils' respective Annual Monitoring Reports. The suggested detailed text on specific waste management methods is considered too prescriptive for what should be a concise and overarching vision and risks repeating what is already set out in national waste policy and in later chapters of the Waste Core Strategy. However, it is noted that as there is currently no reference to the role of energy recovery within the vision and additional text to clarify this would be therefore be appropriate.	Add text to specify that we will be producing less waste than at the start of the plan period. Add text to explain the Waste Core Strategy's stance on the role of energy recovery in diverting waste from disposal.
22925 (10119)	Support	Ashfield District Council	The importance of climate change stressed in Ashfield's response is reflected the Vision, in the Strategic Objectives and in a specific policy in the CS, Policy WCS 13.		Support noted.	n/a

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
22993 (10124)	Object	Peel Environmental Ltd	Peel Environmental Ltd largely supports the vision whereby reduction, re-use and recycling are the key features of the Plan with disposal being a last resort. Nevertheless, recovery is not mentioned within the vision. We consider that this should be referenced to provide for the management and recover value from residual waste which cannot be recycled and which would otherwise be sent to landfill.	The following wording should be included within the Vision: "Recovery in the form of energy from waste will be supported in order to deal with residual waste which would otherwise be disposed of".	Accept - it is considered that it would be appropriate to include a reference to energy recovery alongside existing references to other levels of the waste hierarchy i.e. prevention, re-use, recycling and disposal.	Add text to refer to the role of energy recovery in diverting waste from disposal.
Para 6.3						
22797 (10133)	Object	CPRE (Notts Branch)	The Waste reduction elements in these broad objectives often seem to be buried under wider issues. For example, SO1 aims to 'Strengthen our economy', not primarily a waste related topic. The explanation places the intent to 'promote a diverse economy' before 'minimising waste production'. We suggest this is the wrong emphasis. Similarly, SO3 Mentions dust, noise, odour, etc., but does not connect these effects with waste handling facilities as being their source.	Re-order text to place 'minimising waste production' before 'strengthen our economy'	Not accepted - whilst the reasoning behind this objection is understood, the Waste Core Strategy has to show how it will contribute to wider goals across the plan area including social and economic aspirations as well as environmental and land use issues. The objective here is to use these sustainable waste management measures to benefit and strengthen the local economy, not simply to minimise waste per se. The wording of this objective has been re-assessed to see whether it could be re-ordered to meet CPRE's objection. The outcome of this assessment was that this could not be achieved.	No change proposed.
Objectives						
22925 (10119)	Support	Ashfield District Council	The importance of climate change stressed in Ashfield's response is reflected the Vision, in the Strategic Objectives and in a specific policy in the CS, Policy WCS 13.		Support noted.	n/a

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
SO1						
22885 (10137)	Support	Ashfield District Council	Ashfield District Council is supportive of a number of changes to the Core Strategy Submission Document from the Preferred Option including: * Strategic Objective SO1 has been amended to include "Promote opportunities within the waste sector for new jobs and training/skill development." (para 6.3).		Support noted.	n/a
22914 (10125)	Object	People Against Incineration (PAIN)	Replace 'diverse' with 'sustainable' economy and include additional text to encourage innovative waste management technologies 'where these deliver the best environmental outcome'. Encouraging the options that deliver the best overall environmental outcome is promoted in both the Waste (England and Wales) Regulations 2011, and the revised Waste Framework Directive. Government policy promotes sustainability and zero waste and aims 'to get the most energy out of genuinely residual waste, not to get the most waste into energy recovery'.	Replace: "promote a diverse local economy that minimises waste production and maximises the re-use, recycling and recovery of waste..." with: "promote a sustainable local economy that minimises waste production and maximises the re-use and recycling of waste..." Replace: "Encourage investment in new and innovative waste management technologies..." with "Encourage investment in new and innovative waste management technologies where these deliver the best environmental outcome..."	Partially accepted - the existing wording of SO1 specifies that businesses should be following the waste hierarchy and recognising the value of waste as a resource, all of which will contribute to the best environmental outcome. Additional wording to reflect this is therefore considered unnecessary. However, it is accepted that the first sentence could be improved by including the word 'sustainable' alongside 'diverse'.	Re-word the first part of SO1 to read 'promote a sustainable and diverse local economy...'
SO2						
22858 (10126)	Object	Natural England	It should be made clear that opportunities to enhance the environment should be informed by local Landscape Character Assessments and should aim to contribute to Local Biodiversity Action Plan targets, as recommended in our previous response.	Amend objective to include references to local Landscape Character Assessments and Local Biodiversity Action Plan targets.	Not accepted - this level of detail is not considered necessary within what is a strategic objective, although it is accepted it would be relevant for the subsequent development management policies. The supporting text to Policy WCS12 does refer to landscape and wider biodiversity issues. Detailed policies will also be included in the subsequent Development Management Policies document which will follow this Waste Core Strategy.	No change proposed

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22915 (10127)	Object	People Against Incineration (PAIN)	Remove the word 'after' in SO2 to improve clarity and ease of monitoring.	Remove the word "after" so that the final sentence of SO2 reads: "Protect our heritage assets and their settings, including archaeological remains, and protect the character of our townscapes."	Accepted - this is a typographical error and will be corrected.	Delete the word 'after'.
SO3						
22916 (10128)	Object	People Against Incineration (PAIN)	Include additional wording to make clear that local people should be involved 'from the earliest stages' to accord with the spirit of localism, as expressed in the Localism Act and the National Planning Policy Framework.	Add the phrase "from the earliest stages" so that the second sentence reads: "Make sure that local people have the chance to be involved from the earliest stages in decisions about new waste management facilities by providing more information, encouraging wider involvement and targeting key groups or individuals where appropriate."	Not accepted – it is implicit within the objective that involvement is at an appropriate stage. The Councils' approach to community engagement and consultation is set out within their respective Statements of Community Involvement.	No change proposed
23021 (10134)	Object	CPRE (Notts Branch)	The Waste reduction elements in these broad objectives often seems to be buried under wider issues. For example, SO1 aims to 'Strengthen our economy', not primarily a waste related topic. The explanation places the intent to 'promote a diverse economy' before 'minimising waste production'. We suggest this is the wrong emphasis. Similarly, SO3 Mentions dust, noise, odour, etc., but does not connect these effects with waste handling facilities as being their source.	Include reference to clarify that the environmental impacts listed are related to waste management activities.	Accepted.	Re-word first sentence to read 'protect local amenity and quality of life from the possible impacts of waste management such as ...'

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
SO4 22821 (10135)	Object	Environment Agency	As drafted, the objective on 'Energy and climate' gives more weight to mitigating the impacts of climate change, rather than avoidance, which is contrary to the Flood Risk Management Hierarchy in Planning Policy Statement 25.	Re-word the objective on 'Energy and climate' to highlight the need to avoid locating new facilities within the floodplain.	Partially accepted - it is agreed that this objective should also include a reference to avoiding climate change as well as possible mitigation measures. However, the specific point about avoiding development in the floodplain is implicit within the final sentence. In the case of waste facilities, whether or not they should be located within the floodplain will need to be assessed on a case by case basis and detailed policy guidance will be provided within the detailed development management and site specific policies. Avoiding development within the floodplain is one of the possible measures that could be used to avoid/overcome climate change issues and it would therefore be inappropriate to specify this one example here whilst not mentioning other avoidance or resilience measures. To address this issue a specific reference to the need to avoid development in the floodplain will be added to the supporting text to Policy WCS13 on Managing Climate Change.	Amend objective to include reference to climate change avoidance. Re-word Policy WCS13 supporting text at paragraph 7.55 to make specific reference to the need to avoid inappropriate development in the floodplain as set out in the technical guidance of the National Planning Policy Framework.

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
22917 (10129)	Object	People Against Incineration (PAIN)	Remove reference to encouraging the 'use of combined heat and power where this can help to offset fossil fuel use'. As stated in the Government's Waste Policy Review, without heat off-take, opportunities to help decarbonise the heat sector could be lost and "we are aiming to get the most energy out of the residual waste, rather than to get the most waste into energy recovery".	Remove: "encourage use of combined heat and power where this can help to offset fossil fuel use" and replace with: "discourage the incineration of waste that does not directly contribute towards Good Quality CHP (i.e. combined heat and power that is CHPQA certified), and prevent the incineration of waste wherever incineration could hamper efforts to decarbonise the energy supply."	Not accepted - the text, as written, reflects national policy and refers to both heat and power thereby addressing the issue of heat off-take. Other parts of the Waste Core Strategy specify the role that is envisaged for energy recovery, in all its forms, and make clear that this should help to divert waste away from landfill and not be at the expense of recycling. Additional text will be inserted into the vision to clarify this at the outset and there is therefore no need to include additional text within the objective to reinforce this further. Detailed caveats on the need for Combined Heat and Power Quality Assurance (CHPQA) certification, and how individual energy recovery proposals should be assessed, are considered more relevant to the separate development management policies and will be a material consideration in any case.	No change proposed.
SO5						
21665 (10114)	Support	Inland Waterways Association	Support the use of waterborne freight as a sustainable alternative to road transport		Support noted.	No change proposed.
22839 (10115)	Support	Highways Agency	In terms of the Core Strategy objectives, the Agency is pleased to see specific reference to sustainable transport and the intention to locate waste sites so as to reduce the distances that waste matter is transported.		Support noted.	No change proposed.

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
22918 (10130)	Object	People Against Incineration (PAIN)	Add the word "suitable" so that the second sentence of SO5 reads: "...Locate sites close to suitable sources of waste and/or end-markets to reduce transport distances..." This will provide clarity and ensure that transport distances are reduced, by avoiding locating waste facilities near to source of irrelevant types of waste arisings.	Add the word "suitable" so that the second sentence of SO5 reads: "...Locate sites close to suitable sources of waste and/or end-markets to reduce transport distances..."	Not accepted - the wording of SO5 is intended to establish the broad principle of encouraging sustainable transport measures and minimising the distance over which waste is transported. By definition, it would be impossible to define what is a 'suitable' source of waste within this objective as this is an issue that will need to be addressed on a case by case basis. Therefore, in order to maintain the overall strategic nature of the Waste Core Strategy/Objectives and allow a reasonable degree of flexibility, no change is considered necessary.	No change proposed.
SO6						
22919 (10131)	Object	People Against Incineration (PAIN)	To ensure waste is managed in accordance with the waste hierarchy, incineration over-capacity should be avoided. Where landfill provides the most sustainable option, we should not move away from it. Landfill can be a way of storing materials that have a potential future value and other countries already recognise the value of landfill mining.	<p>Add the phrase "whilst avoiding incineration over-capacity" to the end of the first sentence, to read: "aim to be self-sufficient by providing enough sites to manage the equivalent of our own waste arisings over the plan period - making sure that there is a mix of site types, sizes and locations to help us manage waste locally wherever possible, whilst avoiding incineration over-capacity..."</p> <p>The phrase "and moving away from landfill" should be replaced with: "and moving away from sending untreated waste to landfill".</p> <p>Add "Encourage waste that is landfilled to be segregated by type or composition and/or planning landfills to be excavatable in future where appropriate".</p>	<p>Partially accepted - whilst the desire to avoid over-capacity is understood, it would not be appropriate to write this specifically into the objective as PPS10, paragraph 22, clearly states that, where proposals are consistent with an up-to-date development plan, there is no requirement to demonstrate a quantitative or market need for the proposal.</p> <p>To improve clarity, a wording change could be made to the second sentence to address the issue that landfill may be appropriate in some circumstances and that the priority is to avoid the landfill/disposal of untreated waste.</p> <p>The concept of future re-working of landfill sites (i.e. landfill mining) is a future possibility. In general terms, this would fall under SO1, which includes recovering waste materials, Policy WCS5 in relation to Pulverised Fuel Ash and also Policy WCS8 on new and emerging technologies. There will also be further detail included within the later Development Management policies document. There is not therefore a need to make a detailed reference within SO6. However, it is accepted that it would be appropriate to make specific reference to landfill mining elsewhere within the Waste Core Strategy to address this issue.</p>	<p>Amend second sentence of SO6 to specify the landfill of untreated waste.</p> <p>Add reference to landfill mining as a recovery operation to Fig. 2.1 The Waste Hierarchy.</p> <p>Add text explaining the purpose and possibility of landfill mining to the supporting text for Policy WCS6.</p>

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
23020 (10136)	Object	Environment Agency	Meet our future needs': We believe that the strategy has an important role in helping to exceed (not just to meet) current and future targets for recycling and recovering waste and reducing reliance on landfill. This would be consistent with the Vision.	Re-word 'Meet our future needs' objective to exceed, not just meet, targets to be more consistent with vision.	Accepted - re-wording the objective as suggested would help to underline the aspirational approach of the Waste Core Strategy.	Re-word second sentence of SO6 to read 'Manage our waste sustainably by meeting, and where possible exceeding, current and future targets...'
Para 6.4						
22734 (10132)	Object	Leicestershire County Council	Para 6.4 should make clear that the 'saved' Waste Local Plan policies will also be used to help deliver the Core Strategy's objectives until other (development management or site-specific) policies are in place.	Amend text to explain that the 'saved' Waste Local Plan policies will also be used to help deliver the strategic objectives until other policies are in place.	Accepted - although this is highlighted under the individual objectives, adding a specific reference within the introductory paragraph would add clarity.	Add a final sentence to paragraph 6.4 to highlight that saved policies will also help to deliver the Waste Core Strategy's objectives until the proposed development management and site-specific policies are in place.
Chapter 7						
23001 (10281)	Object	Peel Environmental Ltd	Regarding a statement on the WCS website that the publishing of the NPPF does not national policy on waste (due to it being contained in PPS10, Peel Environmental Ltd highlights para 5 of the NPPF setting out that "local authorities preparing waste plans...should have regard to policies in this Framework as far as relevant."	The WCS should make explicit reference to the presumption in favour of sustainable development (para 14 of NPPF), suggest wording: "When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework." Regard should also be had to the 6th Core Planning Principle (para 17, NPPF) and chapter 7 of the NPPF	Accepted - it is proposed to include a new policy on the presumption in favour of sustainable development to reflect this. The statement on the Councils' website in relation to publication of the NPPF was a general reference intended to reflect Government comments that planning policy for waste would continue to be set out separately and to ensure that respondents were aware that PPS10 remained in place. Text within Chapter 2 will be amended to reflect specific NPPF references waste as suggested.	Insert new policy on the presumption in favour of sustainable development in Chapter 7. Add references to 'national' section of Chapter 2 to highlight those parts of the NPPF which relate to waste.

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
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Waste prevention and re-use

22920 (10233)	Object	People Against Incineration (PAIN)	Need to clarify that subsequent to the production of the Proposed Submission Document the Government announced their intention to scrap this requirement. Consider introducing a policy in line with Policy RWS 1.1, 1.2 and 1.3 of the Regional Waste Strategy.	Clearly state that subsequent to the production of the Proposed Submission Document the Government announced their intention to scrap this requirement. It might be worthwhile introducing a policy in line with Policy RWS 1.1, 1.2 and 1.3 of the Regional Waste Strategy.	Partially accepted - the reference to compulsory site waste management plans will be deleted. Policy WCS1 seeks to encourage all planning authorities to work together alongside other stakeholders to promote waste minimisation and the sustainable management of waste arising from new development. PPS10 imposes a requirement on all planning authorities to consider these issues and the Councils will work actively with the local district and borough councils to achieve this and policies within the Regional Waste Strategy will provide a useful starting point for this. However the detail of specific local policies is for each district/borough to decide through their Local Development Process.	Change reference to legal requirement for Site Waste Management Plans in paragraph 7.4.
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Para 7.3

23002 (10221)	Object	Ms P Daly	Para 7.3 In order to make better use of existing resources, the statement "to promote the re-use of furniture, white goods and waste electrical equipment", should be substantially expanded to indicate that all waste should be repaired and re-used from whatever source, including waste transfer stations if it is practical.	To expand recycling to achieve full and complete re-cycling the words "the re-use of furniture, white goods and waste electrical equipment" should be followed by "and all other wastes re-used wherever practical".	Not accepted; this sentence refers to a particular example rather than an intention or proposal.	No changes proposed
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Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
Policy WCS1						
22828 (10223)	Object	Newark and Sherwood District Council	Policy WCS1 is not considered to be justified because it appears to seek to control all new development, a large proportion of which will be determined by District Councils and note the County/City Council.	To make this policy sound it is considered that it should be amended to say: "Wherever possible or appropriate, all new development ..."	Not accepted - the purpose of this policy is to raise waste awareness across all development and promote a partnership approach. All planning authorities, not just Waste planning Authorities, have a responsibility to consider the waste implications of all development including non-waste related development. PPS10 is clear that all planning authorities must take account of the policy within it, particularly paragraphs 3, 4 and 33-36.	No change proposed.
22948 (10235)	Object	Nottinghamshire Friends of the Earth	Although there are references to 'resource efficiency' and valuing waste as a resource within the strategy text, this is not adequately expressed in the policies. To repeat a comment we have made previously: "Resource constraints, particularly for fossil fuels, are likely to become much more significant over the next 20 years, particularly in the second half of the strategy period. There is therefore likely to be much more emphasis in industry and in society generally on resource efficiency and also on proximity. Therefore any facilities planned to be continuing after 2020 should allow for progressive reduction of residual waste."	Facilities planned to continue after 2020 should allow for progressive reduction of residual waste	Partially accepted - this objection raises a valid issue which will be addressed through the ongoing monitoring and review process and will also be a material consideration in determining planning applications for future waste management facilities. No change to the Waste Core Strategy is therefore necessary.	No change proposed.
22949 (10232)	Object	Nottinghamshire Friends of the Earth	Add at the end: "Any proposals for waste facilities which are intended to continue operation after 2020 should be required to allow for progressive movements of waste up the hierarchy and for progressive reductions in mixed residual waste requiring treatment and/or disposal."	Add at the end: "Any proposals for waste facilities which are intended to continue operation after 2020 should be required to allow for progressive movements of waste up the hierarchy and for progressive reductions in mixed residual waste requiring treatment and/or disposal."	Not accepted - the thrust of this policy concerns the promotion of awareness, understanding and cooperation on waste issues amongst local residents, businesses and local authorities. A specific reference to criteria/conditions for waste management facilities, as suggested, is not considered appropriate or relevant to this policy.	No change proposed.

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
22792 22893 22927 (10187)	Support	CPRE (Notts Branch) / Ashfield District Council	Support of the references within WCS1 to 'minimising waste' and 'maximising re-use' and recognition of the changes made to WCS1 in response to comments made in earlier rounds of consultation.		Support noted	n/a
22798 (10222)	Object	CPRE (Notts Branch)	It might be beneficial to refer here to the Minerals Plan that intends to encourage re-cycling of construction products in order to reduce mineral extraction. It would show a 'joined-up' approach by the Councils.	Include reference to the Nottinghamshire Minerals Local Plan in terms of recycling of construction products.	Partially accepted - whilst this level of detail would be inappropriate for this Policy, a cross-reference could be included within the supporting text to address this issue.	Add reference to Minerals Local Plan in relation to secondary aggregates and recycling to paragraph 7.4

Delivering sustainable waste management

22922 22923 22941 22947 22956 22957 22958 (10227)	Object	PAIN / Nottingham Friends of the Earth /	In combination, these representations are concerned that the 70% overall target for recycling implies a cap on future recycling rates and that materials that are capable of being recycled should not be used for energy recovery. The energy efficiency of certain types of energy recovery is questioned and detailed changes are sought in respect of the role of energy recovery and recycling targets. Mechanical Biological Treatment may be more sustainable than energy recovery in some cases.	<p>The text should seek to promote continued progressive reduction in arisings, progressive improvements in source-separation of waste for reuse, recycling or composting, and therefore progressive reductions in residual waste.</p> <p>Detailed wording changes are suggested to Paragraph 7.10 and 7.11 to reflect that waste could also be recycled or composted as well as recovered for energy and that energy recovery is only sometimes an appropriate solution. Additional references to MBT are also sought.</p>	<p>Partially accepted – paragraph 7.8 already promotes progressive improvements in waste management in line with the waste hierarchy and sets out the WCS ambition to go beyond existing targets where possible.</p> <p>The existing references to energy recovery and the potential for local heat or power are in accordance with the waste hierarchy and national policy for both energy and waste. This text sets out the general context and there is no need detailed caveats. References to composting and Mechanical Biological Treatment will be added for clarity.</p>	Insert a clearer reference to composting within Paragraph 7.9 and include reference to MBT within paragraph 7.9 or 7.10.
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Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
Para 7.8						
22921 (10226)	Object	People Against Incineration (PAIN)	Paragraph 7.8 Should be re-worded as we are legally obliged to follow the waste hierarchy and Waste Framework Directive. The Regional Waste Strategy states that local authorities should 'seek to exceed statutory, non-statutory and best value performance targets for the re-use, recycling, or composting of municipal solid wastes...'	Replace: "...there is no requirement to go beyond the existing recycling targets..." with: "...there is no requirement to put in place local recycling targets that are higher than existing regional and national recycling targets..."	Partially accepted - this point should be clarified to indicate that there is no local requirement to go beyond the existing recycling targets.	Amend first sentence of Paragraph 7.8 to read '...although there is no local requirement to go beyond the existing recycling targets...'
Para 7.11						
22938 (10229)	Object	Derek Kitson Architectural Technologist Ltd	Paragraph 7.11 gives some hope for incineration and energy recovery but includes a curious statement that this should not prejudice recycling. This should be a straightforward commercial and carbon production calculation and there should be a greater understanding and vision of the balance between recycling and energy recovery. For example, if it is cheaper and more effective in terms of carbon release to burn scrap timber to produce energy therefore reducing the amount of fossil fuels burnt then surely this is better than stockpiling the material for recycling. Non-replenishable raw materials, such as metals are appropriate for recycling.	There should be a greater understanding and vision of the balance between recycling and energy recovery.	Not accepted - the National Waste Strategy 2007 (Chapter 5, paragraph 21) refers to public concerns that long-term and/or large-scale energy recovery facilities could 'lock-in' materials that could be recycled and this point was also made repeatedly during consultation on the Waste Core Strategy. It is therefore considered appropriate that the Waste Core Strategy should recognise this issue within the text and in the context of promoting a sustainable role for energy recovery that is focused on diverting waste that would otherwise go to landfill.	No change proposed.

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
Para 7.12						
22959 22960 (10230)	Object	Nottingham Friends of the Earth	The proportions of 70% recycling, 20% energy recovery and 10% disposal within paragraph 7.12 should not be used to justify the figure of 300,000 tonnes per annum of commercial and industrial waste recovery. Commercial pressures will drive greater resource efficiency and therefore less waste. Annual monitoring should focus on the tonnage of residual waste to be disposed of not recycling percentages.		Partially accepted - the figures quoted are indicative based on current estimates but will be subject to regular monitoring and review. Consideration will be given to whether the residual waste disposal tonnage would be a better indicator for annual monitoring purposes although this will depend on whether the data is available. The Environment Agency provide data on the total waste disposed of within the plan area but it is not always possible to establish reliably how much waste (especially commercial and industrial waste) has been imported or exported.	The annual tonnage of residual waste disposal will be used as a monitoring indicator (Table 7) where available.

Table 5

22736 (10188)	Support	Leicestershire County Council	Agree with exclusion of metal recycling from the C&I calculations.		Support noted	n/a
22743 (10243)	Object	Leicestershire County Council	It is unclear from this table and preceding text how figures are derived.	Clearly state how figures are derived in Table 5.	Accept – a summary of how the figures are derived will be included in the text. More detailed information is available in the Background Paper.	Add text to explain figures in Table 5.
22961 (10244)	Object	People Against Incineration (PAIN)	There is no demonstrable need for additional incineration capacity, especially in light of the existing 260 ktpa capacity that has been permitted and consented for Eastcroft (not to mention the feedstock shortfalls reported by Veolia in relation to their existing Sheffield incineration facility, or indeed any of the proposed incineration and biomass/waste wood facilities being considered for nearby locations in and around the Strategy Area).	Make it clear that there is a requirement for more anaerobic digestion capacity (and possibly MBT capacity for bio-stabilisation prior to landfill), but that there is no additional treatment capacity requirement for other forms of "Energy Recovery".	Not accepted - the Councils do not agree with this assessment.	No change proposed.

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
Table 6						
22962 (10242)	Object	People Against Incineration (PAIN)	Evidence for the figures in Table 6 has not been provided. It has not been stated whether these figures are annual capacity or total capacity over the whole Strategy period.	Explain how these figures are derived.	Accepted - data sources and timescales for the tables will be made clearer.	Amend table headings to clarify what is annual and what is total tonnage and include reference to data sources.
22758 22762 (10231)	Object	Caring About South Kirkby / Friends of Kingsway Park	The 10% of waste to landfill is too high a figure. More and more new M.R.F., composting and other such facilities are being granted planning permission within the County alongside increased re-cycling rates of recycling, etc - especially in Mansfield/Ashfield - which, together with more reliance on EfW and/or biomass facilities in the near future, leads to less need for landfill over the period of this Strategy. So may we suggest a drop in that percentage to 5%?	Reduce landfill assumption to 5%	Partially accepted - current estimates and comparisons suggest that, after recycling and energy recovery, approximately 10% of waste would remain as non-recyclable/non-combustible waste, or the disposal/ash residue from either Mechanical Biological Treatment or energy recovery. This figure is therefore seen as a reasonable estimate in the light of current disposal rates. However part of the reason for this objection seems to be that there should be scope to reduce landfill still further if possible and the Councils would agree with this. Although the 70% recycling target has been written into the policy, the other figures are indicative and the 10% landfill rate is not therefore a requirement. Proposals which would result in a lower landfill rate would be supported by this policy as the three sub-clauses prioritise facilitates in order of the waste hierarchy. This is already written into paragraph 7.12 but to help clarify this it is proposed to include additional supporting text within paragraph 7.11.	Insert additional text into paragraph 7.11 to clarify that if it becomes possible to achieve a landfill rate lower than 10% this would be supported.

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
Policy WCS2						
22822 (10236)	Object	Environment Agency	We would like to see protection against over capacity in the policy. We note that Policy WCS7 supports extensions to existing sites subject to the conditions set out, however, with regard to Policy WCS2, does the council consider it appropriate to prioritise the expansion of suitable existing sites over new sites generally, or is this only relevant to disposal sites for non-hazardous waste and inert waste (Policy WCS4)?	Re-word Policy WCS2 to protect against over-provision of capacity. Clarify whether policy WCS2 is intended to prioritise the expansion of suitable existing sites over new sites generally.	Not accepted - the Councils acknowledge that this is a serious issue but, in light of the PPS10 statement that Waste Planning Authorities should not require proposals that are consistent with an up to date development plan to demonstrate a quantitative or market need for their proposal (paragraph 22), it is difficult to see how this could be built into the policy. In practice, the number and scale of facilities delivered will largely be dependent upon market forces. Policy WCS7 sets out the Waste Core Strategy's approach to extensions but these will need to be assessed on their merits.	No change proposed.
22827 (10204)	Object	Environment Agency	In the table, the title for policy WCS2 is different to that on page 47 (i.e. 'Future waste management provision') Policy WCS2 is about promoting the waste hierarchy. In order to monitor this policy, we suggest that for each level of the hierarchy the number of facilities applying for and getting planning permission should be considered (including their respective capacities). Monitoring indicator for Policy WCS14 (Design) needs to clearly define what "good design principles" means.	Amend typographical error in Policy WCS2 title Include additional monitoring indicators for Policy WCS2 to show number of facilities sought and approved by type and capacity. Define good design principles in relation to Policy WCS14	Accepted	Correct Table 7 typographical error in Policy WCS2 title Include additional monitoring indicators for Policy WCS2 to show number of facilities sought and approved by type and capacity. Ddefine good design principles in relation to Policy WCS14 as being in line with current sustainable development standards.

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
22930 (10237)	Object	Ashfield District Council	<p>This is an ambitious but risky target. Ashfield District Council considers it a challenge to meet a 50% recycling rate for Nottinghamshire by 2020, therefore a 70% target for all wastes is very ambitious. For Ashfield this is currently un-tenable as it would require garden waste and weekly food collections, a complete re-modelling of waste collection services/structures and an additional £1.5m revenue provision at a time of rapidly shrinking finances.</p> <p>Although this is a long-term aspiration, and circumstances may change, it is unclear how this target will be achieved, what needs to be done and who is responsible.</p>	Clarify what needs to be done to achieve 70% recycling target and who will be responsible for implementation.	Not accepted – Table 7 within the Monitoring and Implementation Chapter sets out this information as far as it is possible to do so. Table 5 provides an indicative estimate of the amount of additional recycling capacity that may be required to meet this target.	No change proposed.
22937 (10238)	Object	Derek Kitson Architectural Technologist Ltd	<p>Item b) says that energy recovery facilities will only be permitted where they will divert waste from landfill. This is the wrong approach as energy recovery incinerators reduce considerably the amount of material for disposal and the amount of fossil fuels burnt for energy. It also suggests power should be taken into the National Grid or used locally but takes no account of the positive sides of incineration. Suggesting waste goes to Sheffield goes against sustainable travel and more should be done to treat waste locally. Possible sites for incineration should be highlighted such as Colwick Industrial Estate, Nottingham.</p>	Highlight the benefits of incineration and suggest possible sites within the Waste Core Strategy.	Not accepted - this approach is consistent with the National Waste Strategy 2007 and the Government Review of Waste Policy 2011.	No change proposed.

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
22950 (10239)	Object	Nottinghamshire Friends of the Earth	To allow for progressive improvements in recycling, "achieve" should be replaced by "exceed" [i.e. "...aim to exceed 70% recycling or composting..."]. In bullet point a), "sorting, reuse," should be added before "recycling". In bullet point b), add at the end "and the carbon intensity of energy generated will be less than 50g CO2eq/kWh as recommended by the Committee on Climate Change for 2030."	First sentence - "achieve" should be replaced by "exceed" Bullet point a) - "sorting, reuse," should be added before "recycling". Bullet point b) - add at the end "and the carbon intensity of energy generated will be less than 50g CO2eq/kWh as recommended by the Committee on Climate Change for 2030."	Not accepted - the 70% recycling target is as the upper end of what is likely to be achieved and is very ambitious under current circumstances. Flexibility is already built into the plan and the target would in any case be subject to regular monitoring and review and a further change is not therefore considered necessary. Policy WCS2 relates only to those tiers of the waste hierarchy for which waste management proposals would be determined by the Councils in their role as Waste Planning Authority. Policies WCS3 and WCS6 provide for recycling, sorting and transfer, but behavioural measures such as waste prevention, minimisation and re-use do not require built waste management facilities. Policy WCS1 addresses waste reduction, awareness and re-use in the wider sense. The text change for part (b) is considered too detailed for a Waste Core Strategy document.	No change proposed.

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
22963 (10240)	Object	People Against Incineration (PAIN)	Policy WCS2 (b) Both MBT-landfill and anaerobic digestion offer potentially acceptable deviations from the waste hierarchy and therefore may be appropriate for waste that would otherwise be incinerated or composted i.e. for material that would not otherwise need to be disposed of.	Replace: "new or extended energy recovery facilities" with: "new or extended energy recovery facilities, other than anaerobic digestion and MBT-landfill (as distinct from MBT/RDF/SRF),". Replace: "and the heat and/or power generated can be used locally or fed into the national grid;" with: "and evidence is provided to demonstrate that the heat and power generated will be used locally in a Good Quality CHP scheme, and that there would be appropriate source segregation and pre-treatment for any waste sent to the facility so that as far as practicable recyclable and compostable material is not incinerated;" Replace: "this would divert waste that would otherwise need to be disposed of" with "this capacity would only be used to treat waste that would otherwise need to be disposed of". Clarification is needed to explain how it would be determined whether or not waste "would otherwise need to be disposed of" throughout the duration of the planning consent.	Not accepted - this level of detail and qualification is not considered appropriate to the Waste Core Strategy. An assessment of whether waste would be diverted from landfill can only be considered on case by case basis in relation to specific proposals.	No change proposed.
22799 22997 (10189)	Support	CPRE (Notts Branch) / Peel Environmental Ltd	Both representations are expressing support for WCS2.		Support noted.	n/a

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
23024 (10241)	Object	People Against Incineration (PAIN)	<p>Energy recovery</p> <p>"Energy recovery" is a term that can be used loosely to mean a wide range of things.</p> <p>The definition given within the Glossary is unclear and seems to be inconsistent with the term's usage elsewhere in the document.</p> <p>Policy WCS2(b) uses the term "Energy Recovery Facility" (which is not itself defined) and this seems to include waste incineration (including gasification and pyrolysis) but not AD, and may or may not include various forms of MBT or RDF processing.</p> <p>Similarly, it is unclear whether or not AD, MBT-Landfill, RDF processing, etc are included within the "20% max energy recovery" target in WCS2.</p>	The definition of energy recovery needs to be amended to make it clear and consistent with the way that the term is used in the rest of the document.	Not accepted - the technologies referred to by PAIN are already specified within the definition.	No change proposed.
Para 7.16						
23006 (10195)	Object	Mr J Potter	<p>Paras 7.15/7.16/7.18</p> <p>Sitting waste management 'close to' Nottingham could be objectionable (not sound) if this conflicts with or doesn't protect the Nottingham Green Belt. If development was within industrial areas or the main urban areas, and not the outer suburban areas, it might not be as much of an issue.</p> <p>The reference to growth at Clifton in 7.16 illustrates that the Councils are "cooking-the-core-strategy-books".</p>	Green Belt and/or Greenfield land-raise isn't acceptable as it would spoil/degrade land and valued rusticity.	Not accepted - Policy WCS3 and its supporting text should be read alongside Policy WCS6 which sets out specific criteria for different types of waste management facility and focuses the majority of uses within industrial/urban areas as sought by this objection. This link is made clear in paragraph 7.15, which explains that the broad principles of WCS3 are supported by more detailed criteria in WCS6. The reference to Clifton within paragraph 7.16 is part of a broader reference to the built up areas around Nottingham and notes that this wider area is likely to see future housing and employment growth.	No change proposed.

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
Para 7.19						
23010 (10225)	Object	Mr J Potter	Policy WCS3 and supporting text in para 7.19 should contain clearer-cut assurances against the creep of unwanted/inappropriate waste development.		Not accepted - this concern is addressed by the overall approach of the Waste Core Strategy and the development management policies to be prepared to support the broad strategic policies within the Waste Core Strategy. These will also cover the site specific impacts of any development proposals. In the interim proposals will be assessed against the saved policies of the Waste Local Plan.	No change proposed - issue will be addressed in separate development management policies document.
Policy WCS3						
22842 (10183)	Support	Highways Agency	With regard to the broad locations for future development described within the document, the Agency has previously noted that the intention to locate larger waste facilities in and around Nottingham, the sub-regional centres and the main towns, does accord well with the Agency's favoured approach which would seek to ensure that future waste provision in the County makes use of sites which can help to reduce the need to travel and minimise the impacts of waste related trips on the highway network, particularly the SRN.		Support noted.	n/a

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
22870 (10214)	Object	Express Energy	The policy rationale is to reduce the travel distance for waste but it is important that all potential sustainability considerations are given due weight and that distance is not main deciding factor. The effect is to support development of major facilities only within Nottingham and Mansfield/Ashfield. This unduly restricts the potential location of new major waste treatment facilities, especially to serve the northern half and central areas of the Plan area. This is overly prescriptive and the lack of flexibility, and failure to test reasonable alternatives, makes the plan unsound.	The following wording is therefore suggested for inclusion within Policy WCS3 after the wording "...fit in with the local character." "Appropriate waste treatment facilities will be supported in or close to alternative built up areas where they are demonstrated to contribute towards the development of a sustainable waste management strategy for the County in accordance with the other policies and provisions of the plan." Such wording would be entirely consistent with the presumption in favour of sustainable development and the Government's commitment to supporting sustainable economic growth and the transition to a low carbon economy, as detailed within the National Planning Policy Framework.	Not accepted - this objection highlights that the spatial strategy of the Waste Core Strategy focuses the majority of new development in, or close to, specified main urban areas. This reflects not only the geography of the plan area but also its centre of gravity in terms of economic activity and population and therefore waste production. To make the changes suggested within this objection would effectively remove underlying spatial strategy to allow waste facilities of any size, within any settlement. In preparing the Waste Core Strategy it was recognised that there will inevitably be a tension that some development proposals will not fit in with the overall strategy. However that is not, in itself a, reason to change a strategy that has been prepared in accordance with the extant national, regional and local policy framework and reflects the underlying principles of sustainable waste management. Policy WCS11 (as proposed to be revised) seeks to address this issue and makes clear that proposals which fall outside of the 'broad locations' identified within Policy WCS3, and on the Key Diagram, would need to demonstrate why it would be inappropriate for them to be located within any of these broad locations and consequently that they would provide the most sustainable option for dealing with that waste.	No change proposed.

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
22946 (10211)	Object	Nottinghamshire Friends of the Earth	There are a number of policies which say "will be supported" or similar without adequate constraint. This relates particularly to policies WCS 3, 5, 6, 7, 8, and 12. It would be appropriate to at least add in each case "subject to other development plan policies". It is acknowledged in the supporting text, for example in para 7.50, that the saved policies in the Waste Local Plan and policies in Local Development Frameworks will apply, but it would be helpful to repeat this in other sub-sections and to recognise this point in relevant Waste Core Strategy policies.	Add 'subject to other development plan policies' to policies WCS3, 5, 6, 7, 8 and 12. Repeat clarification in other subsections that the saved policies in the Waste Local Plan and policies in Local Development Frameworks will apply.	Not accepted - the policies of the plan should be read as a whole and environmental acceptability is covered under Policy WCS 12. Repetition of this clause in other policies is not therefore necessary.	No change proposed.
22964 (10212)	Object	People Against Incineration (PAIN)	The policy should not be used to support facilities that are inappropriate, over-sized, or that are not needed. The wording of the policy should be changed to state that facilities will only be supported 'in cases where the need for the facility is robustly demonstrated	Replace: "The development of large-scale waste treatment facilities will be supported in or close to the built up areas of Nottingham and Mansfield/Ashfield." with: "The development of appropriate large-scale waste treatment facilities will be supported in or close to the built up areas of Nottingham and Mansfield/Ashfield in cases where the need for the facility is robustly demonstrated." Replace: "Smaller/medium sized waste treatment facilities will be supported in the above areas and in, or close to, the built up areas of Newark, Retford and Worksop." with: "Appropriate smaller/medium sized waste treatment facilities will be supported in the above areas and in, or close to, the built up areas of Newark, Retford and Worksop in cases where the need for the facility is robustly demonstrated."	Not accepted - this suggested change would be contrary to national policy as set out in Paragraph 22 of Planning Policy Statement 10 which states that 'when proposals are consistent with an up to date development plan, waste planning authorities should not require applicants...to demonstrate a quantitative or market need for their proposal.'	No change proposed.

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
22998 (10224)	Object	Peel Environmental Ltd	Peel Environmental Ltd is largely supportive of WCS3. Nevertheless it is important to recognise that there are significant differences in the nature and scale of throughput between the different forms of recovery systems.	The policy should recognise that there are significant differences in the nature and scale of throughput between the different forms of recovery systems.	Not accepted - the difference in scale between different types of energy recovery is already recognised within Policy WCS6 and Appendix 2 (Indicative Size of Waste treatment and Disposal Facilities). As Policy WCS3 is a broad, strategic policy, further repetition here is not considered necessary.	No change proposed.
23010 (10225)	Object	Mr J Potter	Policy WCS3 and supporting text in para 7.19 should contain clearer-cut assurances against the creep of unwanted/inappropriate waste development.		Not accepted - this objection will be addressed by the fact that there will be a separate suite of development management policies to support the broad strategic policies within the Waste Core Strategy. These will cover the site specific impacts of any development proposals. In the interim proposals will be assessed against the saved policies of the Waste Local Plan. Additional text within the Waste Core Strategy is not therefore considered necessary.	No change proposed - issue will be addressed in separate development management policies document.

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
22760 22764 22874 (10202)	Object	Caring About South Kirkby / Friends of Kingsway Park / Nottinghamshire Wildlife Trust	<p>The apparent presumption in favour of large-scale facilities around Nottingham and Mansfield/Ashfield is unsound. Waste requirements are likely to be less than predicted and new forms of re-use and minimisation are emerging. Small-medium scale, local facilities are more sustainable/flexible and able to respond to changes in arisings/technology. Large-scale facilities could restrict local minimisation, recycling and re-use and encourage longer transport distances and attract waste from outside Nottinghamshire. There should be a presumption against large-scale facilities.</p> <p>The Mansfield/Ashfield area should be identified for medium rather than large scale facilities.</p>	<p>There will be a general presumption against the development of large-scale waste treatment facilities. Smaller/medium sized waste treatment facilities will be supported in the above areas and in, or close to, the built up areas of Newark, Retford and Worksop, Nottingham and Mansfield-Ashfield. Etc"</p> <p>The words "Mansfield/Ashfield" should be moved from the sentence "large scale Mansfield/Ashfield" to be added to the sentence "... medium sized facilities Worksop and Mansfield/Ashfield."</p>	<p>Not accepted - Policy WCS3 does not require large-scale facilities to be built in these areas and does not preclude smaller or medium sized facilities. Concerns over large-scale facilities have been raised at various stages in preparing the Waste Core Strategy and the detailed criteria within Policy WCS6 restrict the size of facilities in certain locations to address this. The Councils believe that this settlement hierarchy based approach is sustainable, proportionate and appropriate. It closely reflects the physical and geographic size of these main urban areas and the associated levels of housing, commerce, industry and construction they support and recognises the likely impacts of planned future growth. The proposed pattern of development is therefore proportionate to the amount of waste that is likely to be produced as larger facilities would only be permitted in the largest urban areas. This approach also provides for flexibility in the delivery of facilities as a mix of different size facilities would be supported. This would also respond to changes in the volume of waste produced whether this grows in line with any economic recovery, or there are further reductions. The strategy also has to recognise that the majority of new waste management facilities are likely to be developed by the private sector and will not be delivered unless they are economically viable. The East Midlands Regional plan sets out a pattern of facilities based on settlement size and there is a clear expectation that the principal urban areas should be the focus of future waste management and that in other areas large, centralised facilities may be appropriate. For these reasons, a blanket presumption against large facilities would not be justified.</p>	No change proposed.

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
22800 22823 (10208)	Object	CPRE (Notts Branch) / Environment Agency	Policy should specify further detailed Green Belt protection and that facilities should only be located within the floodplain, where there are no other reasonably available sites in areas at lower risk of flooding.	<p>Add 'where its benefits are not outweighed by detrimental visual impact on the landscape character or urban form of the district or the purposes of including land within the Green Belt' to Policy WCS3.</p> <p>Amend Policy WCS3 wording to highlight that facilities should only be located within the floodplain where there are no other reasonably available sites in areas at lower risk of flooding</p>	<p>Partially accepted - Policy WCS3 should not be read in isolation and, from a strategic perspective, environmental concerns are covered under Policy WCS12 (Protecting our Environment and Quality of Life) and will be supported by detailed development management policies/the saved policies within the Waste Local Plan. Additional proposed changes are proposed to Policy WCS12, and its supporting text, to make clearer the environmental assets that should be protected. In light of this, the changes sought to Policy WCS3 are not considered necessary.</p> <p>Green Belt and flood risk issues are important considerations in the location of development but are part of the detailed assessment of individual site proposals. Green Belt protection is principally delivered through the NPPF and district local plan policies. The Waste Core Strategy takes account of that in policies WCS3 and WCS6 and elsewhere in the supporting text.</p>	No change proposed

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
Para 7.25						
22749 22750 (10150)	Object	Northamptonshire County Council	There are no policies setting out how proposals for hazardous or radioactive waste would be determined.	Include specific policies on hazardous and radioactive waste.	<p>Partially accepted - Nottinghamshire and Nottingham have very little, if any, scope for the disposal of hazardous waste due to the geological constraints within the plan area which is why a specific policy on hazardous waste disposal is not included. However it is accepted that this could be made clearer within the text. In practical terms, it is very unlikely that Nottinghamshire could provide suitable disposal capacity for hazardous waste, although it is accepted that this possibility should not be ruled out.</p> <p>Nottinghamshire does however import a similar amount of hazardous waste for treatment at facilities within the plan area and it is considered that this helps to offset the reliance on disposal capacity elsewhere, thus contributing to the overall hazardous waste management capacity available. The text at paragraph 7.25 will be expanded to illustrate this point.</p> <p>The Waste Core Strategy policies are structured by the types of facilities rather than specific waste streams. Facilities for the treatment of hazardous waste or intermediate radioactive waste would therefore be dealt with under Policies WCS3 (broad locations) and WCS6 (site criteria) as for all other forms of waste treatment. A specific change to the supporting text for Policy WCS6 is therefore proposed to clarify this.</p> <p>Very low level radioactive waste can be disposed of or treated at normal disposal and treatment facilities and does not require specialist treatment or disposal. Facilities for high level radioactive waste would be determined nationally. It is not therefore intended to refer to these categories of waste.</p>	<p>Amend Policy WCS4 and supporting text to cover hazardous waste disposal</p> <p>Expand paragraph 7.25 to highlight Nottinghamshire's role in hazardous waste treatment which helps to offset reliance on disposal elsewhere.</p> <p>Insert new paragraph after 7.40 to make it clear that Policy WC6 applies to facilities for all types of waste, including hazardous.</p>

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
Policy WCS4						
22801 (10169)	Object	CPRE (Notts Branch)	Reference should be included for the land-fill use of worked out sand and gravel pits, and other voids created by surface mineral extraction.	Included the land-fill use of worked out sand and gravel pits, and other voids created by surface mineral extraction within Policy WCS4.	Not accepted - the suggested change is unnecessary as Policy WCS4 already refers to former mineral workings which, by definition, include sand and gravel workings. Paragraph 7.24 refers specifically to the possibility of using sand and gravel sites for inert waste disposal but these sites would not necessarily be suitable for non-hazardous waste.	No change proposed.
22808 (10160)	Support	Eakring Farming Ltd	We particularly agree with the thrust of Policies WCS4 and WCS6 which identify a preference for the siting of disposal facilities on former colliery tips where restoration and/or reworking may be required.		Support noted.	n/a
22759 22763 (10168)	Object	Caring About South Kirkby / Friends of Kingsway Park	There is too much emphasis on using old colliery sites and/or derelict land for disposal sites. Areas of historic mining operations have the constant threat of a large dump.	Change wording of WCS4 from "... landfill capacity is necessary" to "...capacity is necessary where no other suitable, local facility is available"	Not accepted - the purpose of this policy is to provide sufficient capacity for Nottinghamshire and Nottingham's future landfill needs, recognising that, with only one non-hazardous site close to the identified shortfall areas around Mansfield/Ashfield and Nottingham, there is a need to prioritise future provision within this area if possible. However, the supporting text notes the difficulties in finding a suitable non-hazardous site due to the environmental and geological constraints. For this reason the policy makes provision for a possible site and/or sites outside this preferred area if no more suitable site is available. Existing sites near Worksop, Retford and Newark will continue to serve the north and east of the county.	No change proposed.

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
22806 22991 (10170)	Object	Eakring Farming / Broomco	<p>Policy WCS4 should recognise that extensions to existing sites may not always be the preferred option and that in some case a new site may be more appropriate. Guidance is need on the matters to be taken into account for developing new sites or extensions.</p> <p>The policy focus on disposing of inert waste within old mineral workings or other voids could mean that there is a shortage of restoration material for old colliery tips and that opportunities to restore such sites are therefore lost.</p>	<p>Amend policy and supporting text to recognise that a new site may be a better option than an extension in some cases. Provide guidance on matters to be taken into account for developing new sites or extensions.</p> <p>The policy should be spilt into two parts to deal with non-hazardous waste separately from inert waste as in the Leicestershire Waste Core Strategy.</p> <p>Restoration of old colliery sites should be the priority for inert waste.</p>	<p>Not accepted - it is considered that the wording of Policy WCS4 and its supporting text already adequately recognise that extensions to existing sites may not always be possible or appropriate. Paragraph 7.23 stress that extensions would only be acceptable where this would not create any additional environmental impacts or make existing problems worse. The structured sequence of search within Policy WCS4 allows for other flexibility depending on circumstances and the Councils feel that giving a general priority to extending existing sites, where suitable, is an appropriate policy stance.</p> <p>Whilst the availability of suitable restoration material for old colliery tips and other derelict land is a valid consideration, it is not clear on what basis this should take precedence over the need to restore existing mineral voids. The Councils do not therefore agree that any change is necessary to the order of this policy or that is contrary to PPS10.</p>	No change proposed.
Policy WCS5						
22747 (10245)	Object	Leicestershire County Council	Most policies use the word 'support' instead of 'permit' with the exception of Policy WCS5. Is there a reason for the difference?		Accepted - the wording will be amended to reflect how the policy will be applied.	Replace the word 'permitted' with 'supported' in WCS5.
22802 (10247)	Object	CPRE (Notts Branch)	Reference should be included for the land-fill use of worked out sand and gravel pits, and other voids created by surface mineral extraction.	Include the land-fill use of worked out sand and gravel pits, and other voids created by surface mineral extraction within Policy WCS5.	Not accepted - this is already specifically included within the supporting text at paragraph 7.29 and is also covered by the term 'mineral workings' within the policy text making any repetition unnecessary.	No change proposed.

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
22880 (10246)	Object	Nottinghamshire Wildlife Trust	Nottinghamshire Wildlife Trust would support selective use of Pulverised Fuel Ash (PFA) to partially infill quarry voids, where this would achieve the better restoration of those sites to diverse habitats, in accordance with Biodiversity Action Plan (BAP) priorities, not to agriculture per se. For example, where sand and gravel extraction would result in a deep water-filled void, partial infilling can enable restoration to scarce BAP habitat such as reedbed, marsh, fen and wet grassland. However, filling the entire site with PFA for intensive agricultural land use would result in less biodiversity - contrary to the entire premise of the UK BAP/LBAP and national, regional and local policy.	Change policy wording as follows: "....For ash that cannot be recycled in the foreseeable future, priority will be given to proposals that will use the ash to fill and reclaim mineral workings or other derelict voids in order to create BAP priority habitats which are appropriate to that Natural Character Area, where significant biodiversity gain would be achieved over what is already present. Land-raising of ash for disposal will only be acceptable when no other reasonable options exist."	Partially accepted - although this change is considered too detailed for the policy, it is agreed that the potential for biodiversity gains through restoration should be recognised within the supporting text and changes are proposed accordingly. A related change is also proposed to Policy WCS5 to refer to benefits in a more general sense.	Include additional text in 7.29 to highlight how restoration could contribute to biodiversity gains. Amend Policy WCS5 to refer to restoration benefits.
22944 (10185)	Support	EDF Energy	We support the proposal, on Page 51 of the Waste Core Strategy, to allow power station operators to maintain stockpiles of ash to be sold at a time in future as a recycled aggregate. EDF Energy also supports the statement in the strategy to give priority to proposals that will use ash to fill and reclaim mineral workings or other derelict voids. These proposals are seen as a positive step and we now look forward to playing our part in future sustainable waste management in Nottinghamshire.		Support noted, a related change to Policy WCS5 concerns the need to limit the period for stockpiling for future recycling.	No change proposed in respect of this representation but change to WCS5 proposed for clarification.
23011 (10249)	Object	Mr J Potter	Policy WCS5 should contain clearer-cut assurances against the creep of unwanted/inappropriate waste development.		Not accepted - this concern is addressed by the overall approach of the Waste Core Strategy and the development management policies to be prepared to support the broad strategic policies within the Waste Core Strategy. These will also cover the site specific impacts of any development proposals. In the interim proposals will be assessed against the saved policies of the Waste Local Plan.	No change proposed.

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
23013 (10248)	Object	Nottinghamshire Friends of the Earth	There are a number of policies which say "will be supported" or similar without adequate constraint. This relates particularly to policies WCS 3, 5, 6, 7, 8, and 12. It would be appropriate to at least add in each case "subject to other development plan policies". It is acknowledged in the supporting text, for example in para 7.50, that the saved policies in the Waste Local Plan and policies in Local Development Frameworks will apply, but it would be helpful to repeat this in other sub-sections and to recognise this point in relevant Waste Core Strategy policies.	Add 'subject to other development plan policies' to policies WCS3, 5, 6, 7, 8 and 12. Repeat clarification in other subsections that the saved policies in the Waste Local Plan and policies in Local Development Frameworks will apply.	Not accepted - the policies of the plan should be read as a whole and repetition of this phrase in other policies is therefore unnecessary.	No change proposed.
Para 7.31						
21666 (10165)	Support	Inland Waterways Association	Support the use of waterborne freight as a sustainable alternative to road transport as described in items 7.31 and 7.34		Support noted.	n/a
Para 7.34						
22988 23004 (10166)	Object	Occupy Nottingham (Mr C Freeman) / Ms P Daly	Incineration, gasification and pyrolysis are no longer suitable technologies and should be ruled out. The Waste Core Strategy should promote land raise (dry-tomb storage) with a waterproof liner as a virtually pollution free alternative.-	Delete references to incineration, gasification and pyrolysis. Identify suitable site criteria for land-raise/dry-tomb storage.	Not accepted - national policy on both waste (PPS10, National Waste Strategy) and energy (EN-3) states that incineration, gasification and pyrolysis all have a role to play in sustainable waste management and this is in accordance with the waste hierarchy in terms of energy recovery. It would not therefore be appropriate for the Waste Core Strategy to rule out a whole tier of the waste hierarchy. Reference is already made to the criteria for land-raise within paragraph 7.39 and the criteria matrix within Policy WCS6.	No change proposed.

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
Para 7.35						
22940 (10164)	Object	Derek Kitson Architectural Technologist Ltd	Anaerobic digestion is a method particularly useful and suited to rural areas and can help considerably where the proposed development in question is a tourism related facility, such as holiday cottages, log cabins, caravan parks or other tourist facilities that attract visitors in fairly large numbers. Rural areas do not enjoy the same sewage disposal facilities as urban areas and this coupled with waste produced from some agricultural operations really can make a difference with the energy requirement for the venue. Both anaerobic digestion and composting should be seen and promoted as suitable rural activities and employment.		Not accepted - Policy WCS6 and its supporting text (Paragraph 7.35) recognise that this can be suitable in agricultural areas, but restrict this to smaller scale schemes on the grounds that large scale schemes would be perceived as being of an industrial scale that would not be appropriate within the open countryside. The Councils feel that this is proportionate and reflects guidance in PPS10 (paragraphs 20 and 21), especially in relation to the co-location of complementary activities and the re-use of redundant farm buildings and their curtilages.	No change proposed.
Para 7.39						
22989 23003 (10166)	Object	Occupy Nottingham (Mr C Freeman) / Ms P Daly	Land-raise on old colliery tips and on derelict land is unacceptable due to its pollution potential unless the land-raise has a waterproof replaceable top-liner. This is dry-tomb storage.	In order to make recommendation of land-raise virtually pollution free and acceptable, it should read - "Land-raise schemes with a replaceable waterproof top liner (Dry Tomb Storage) may be appropriate on derelict land and old colliery tips where this would provide the best means of reclamation..."	Not accepted – it is not necessary to specify the detailed engineering requirements for landfill or land-raise sites within the Waste Core Strategy. This will be a matter for the subsequent development management policies and the Environment Agency in relation to individual site permits.	No change proposed.

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
Policy WCS6						
22808 (10160)	Support	Eakring Farming Ltd	We particularly agree with the thrust of Policies WCS4 and WCS6 which identify a preference for the siting of disposal facilities on former colliery tips where restoration and/or reworking may be required.		Support noted.	n/a
22999 (10163)	Object	Peel Environmental Ltd	Peel Environmental Ltd is generally supportive of WCS6, particularly the general locations for medium or large energy recovery facilities, which include employment land and derelict land/other previously developed land. With regard to AD facilities, it is recognised that such facilities are appropriate for industrial locations, however, it is also important to emphasise that there are clear locational advantages of such facilities being located close to and/or having easy access to agricultural areas for the use of digesate.	There should be emphasis on the fact that there are clear locational advantages of AD facilities being located close to and/or having easy access to agricultural areas for the use of digesate.	The general support for Policy WCS6 is noted. In terms of anaerobic digestion, Policy WCS6 and its supporting text (Paragraph 7.35) recognise that this can be suitable in agricultural areas, but restrict this to smaller scale schemes on the grounds that large scale schemes would be perceived as being of an industrial scale that would not be appropriate within the open countryside. The Councils feel that this is proportionate and reflects guidance in PPS10 (paragraphs 20 and 21), especially in relation to the co-location of complementary activities and the re-use of redundant farm buildings and their curtilages.	No change proposed.

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
22383 (10167)	Object	Waste Recycling Group	Existing landfill sites should be included as potential development sites for future recycling activities/developments and not excluded on the grounds of 'open countryside' policy or limited by the life of the landfill permission.	Existing landfill sites should also be included in the scope of suitable sites for development of recycling facilities and should not be restricted to the life of the landfill. This would enable alternative development and after use of these sites which are unlikely to be able to be fully completed and restored through landfill due to the reductions in landfill disposal as specified by the waste core strategy.	Not accepted - whilst the Councils are sympathetic to the intention behind this objection, which is to allow the re-use of previously developed land that is already in waste management use; this would create a conflict with other policies relating to the protection of Green Belt and/or open space. It is likely that this would also conflict with existing restoration conditions which are likely to mean that such sites have to be considered as Greenfield land. This is a difficult balance to achieve as in some ways this could mean a 'lost opportunity' for re-development but this has to be weighed against the fact that all of the existing landfill sites within the plan area are within the Green Belt and/or open countryside. They are a legacy of former mineral working and are not therefore necessarily well related to the main sources of waste within the plan area or the existing transport network. It is also likely that re-development proposals would focus on built uses which would impact on the surrounding landscape. As the majority of landfill schemes are permitted on the basis of restoring a former mineral working back to agricultural, woodland or open space, it would therefore be inappropriate for the Waste Core Strategy to promote the wholesale re-development of such sites, unless they are able to satisfy the other development criteria within the strategy.	No change proposed.

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
22931 (10162)	Object	Ashfield District Council	<p>WSC6 identifies employment land as likely to be suitable for waste facilities but gives no indication of the potential demand for such sites. There is a lack of specific information on how the additional capacity requirements will be met and what type of waste developments are likely to come forward. From a district council perspective, this is presented as an unknown factor and is unlikely to be taken account in looking at employment land requirements at a district level.</p> <p>Whilst it is appreciated this is very difficult, it raises the question of how will a site allocation document be developed?</p>	Quantify the amount of employment land likely to be required for future waste management facilities.	<p>Not accepted - whilst the reasons for this objection are fully understood, the lack of available waste data and certainty from the waste industry makes it impossible to predict future requirements to this degree. The amount of land required will depend upon the type of waste management technology proposed and this is likely to change during the plan period as newer/more efficient technologies emerge. Any attempt to quantify the actual land take required could therefore prove to be inaccurate, unduly prescriptive and counter-productive. Assessment of the available employment land (existing and allocated) demonstrates that there is sufficient employment land available to meet likely Waste core Strategy needs without compromising the availability of land for other employment uses. Discussions with Ashfield and other district councils have considered whether there is a need to identify the amount of land likely to be required for waste management separately from other types of employment use. However, the Councils understanding, confirmed in the National Planning Policy Framework is that waste management facilities should rightfully be considered as employment uses and, therefore, there is no reason why they should be considered differently from other employment uses in terms of the amount of land required. Local employment allocations may distinguish between broad use classes but they do not typically distinguish between the amount of land required for different products or materials to be stored in warehouse/distribution units or the types of products manufactured - the concern is more about whether the impacts of that use or process are appropriate in any given location.</p>	No change proposed.

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
22841 23014 (10161)	Object	Highways Agency / Nottingham Friends of the Earth	The policy should also include reference to proposals being acceptable on transport grounds. A caveat should be added to the policy to make clear that proposals would only be permitted subject to them being environmentally acceptable in accordance with other Waste Core Strategy and saved policies.	The policy should also include reference to proposals being acceptable on transport grounds. A caveat should be added to the policy to make clear that proposals would only be permitted subject to them being environmentally acceptable in accordance with other Waste Core Strategy and saved policies.	Not accepted - the Councils' view remains that the plan should be read as a whole and that cross-referencing between policies is therefore unnecessary. The detailed points raised by the objectors in terms of transport and environmental constraints are addressed in Policies WCS10 and WCS12 the respective supporting text.	No change proposed.

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
22879 22965 (10159)	Object	Nottinghamshire Wildlife Trust / PAIN	Disagree with the assumptions about the availability of former colliery land for re-development and the suggestion that such sites could be treated as derelict or previously developed land. Such sites are likely to have extant restoration conditions and should be treated as Greenfield sites. The use of the winding tower symbol to represent derelict or previously developed land is inappropriate.	Delete the phrase 'this could include former colliery land in need of restoration'. Add additional text to clarify that such sites are now few in number and that most sites will have extant restoration conditions making them unsuitable for built development. Use an alternative symbol to the winding tower to depict derelict or previously developed land.	<p>Partially accepted - the East Midlands Regional Plan (RSS8) identifies former colliery land within what it describes as the northern-sub area (including the northern half of Nottinghamshire) as potentially suitable for waste development, particularly given the priorities for regeneration within this part of the region. Although the Government has stated its intention to revoke regional strategies, the requisite legalisation is not yet in place and the Regional Plan therefore remains part of the statutory development plan, albeit the intention to revoke it should be taken into account as a material consideration. The Councils have considered this position carefully in drafting the Waste Core Strategy and believe that the Waste Core Strategy achieves an appropriate compromise by reflecting how the requirements of the Regional Plan could be met whilst acknowledging the changing circumstances. In this instance, even when the Regional Plan is revoked, the re-use of previously developed land is an established and sustainable planning principle and will remain within the National Planning Policy Framework and PPS10. It is therefore considered that Waste Core Strategy aim to re-use derelict or previously developed where possible is sound. However, it is accepted that where there are existing planning conditions that require a site to be restored/reinstated to Greenfield land, then any new development proposal should be considered as if the site were undeveloped. This is not currently made sufficiently clear in the supporting text to Policy WCS6 and revised wording is therefore proposed.</p> <p>It is not proposed to delete the reference to former colliery land from the policy as it has been demonstrated that there are sites still awaiting restoration, or that have been poorly restored, where it is considered that this principle should apply.</p> <p>Any inference about the use of the winding tower symbol is unintentional but the Councils will seek to find a suitable alternative to address this concern.</p>	Include additional supporting text to clarify that where existing restoration conditions are in place, that require reinstatement to greenfield land, then any future proposals must be determined as if the site were undeveloped. Replace the existing winding tower symbol.

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
<i>Policy WCS7</i>						
22951 22966 23015 (10156)	Object	Nottingham Friends of the Earth / PAIN	It would be helpful to cross reference to the other policies of the Waste Core Strategy in this policy as it should be made clear that proposals should be assessed in the light of any adverse impacts. The policy does not properly address the issues raised in the supporting text and could lead to unsustainable facilities being permitted.	Additional wording should be included in the policy to reflect what is set out in the supporting text.	Not accepted - whilst the reasons for this objection are understood, the Policy must be read in conjunction with the supporting text which clearly states that proposals will need to show that there will be no unacceptable environmental impacts. Policy WCS12 provides the overall policy for environmental protection and amenity issues and is supported by existing saved policies to be replaced by future development management policies in due course.	No change proposed.

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
Policy WCS8						
22952 22967 23016 (10155)	Object	Nottingham Friends of the Earth / PAIN	<p>The policy should be deleted as it selectively favours new technologies contrary to the National Waste Strategy which favours anaerobic digestion and contrary to Paragraph 7.10 of the plan which states that the Waste core Strategy is technology neutral. If retained the policy should be worded more sceptically and explicitly require a reduction in overall carbon emissions, compliance with the waste hierarchy and be subject to the other constraint policies within the plan.</p> <p>The policy should clarify what is meant by the efficient and sustainable management of waste.</p>	<p>Delete Policy WCS8.</p> <p>Add 'subject to other development plan policies' to policies WCS3, 5, 6, 7, 8 and 12.</p> <p>Repeat clarification in other subsections that the saved policies in the Waste Local Plan and policies in Local Development Frameworks will apply.</p>	<p>Not accepted - the policy is not considered to be selectively favouring any specific technology, rather it recognises that best practice and new technologies will continue to develop over the life of the plan. This provides flexibility so that the plan can adapt to unforeseen circumstances and ensures new and emerging technologies are not deterred by the absence of relevant development plan policies. It also specifically helps to achieve the wider strategic objective (SO1) of encouraging an innovative, diverse and sustainable waste management industry. Without such a policy the plan would effectively be silent on new or emerging technologies and proposals could only be determined against prevailing national and/or regional policies. This policy approach has been used successfully within the current Waste Local Plan and is in line with national policy set out in PPS10 and the National Planning Policy Framework and reflects the approach taken by other Waste Planning Authorities in their Waste Core Strategies. There are caveats to the policy support in that proposals should demonstrate that they offer an appropriate, efficient and sustainable solution to waste management. As with all proposals this will be judged against the waste hierarchy; national and regional policy; and the combined policies of the Waste Core Strategy, saved Waste Local Plan policies, until such time as they are replaced; and future development management policies alongside relevant policies in other local development frameworks. Paragraph 7.1 makes clear that the policies of the plan should be read as a whole and in conjunction with relevant policies in other development plan documents.</p>	No change proposed.

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
Para 7.43						
22824 (10158)	Object	Environment Agency	Paragraph 7.43 states that existing and new facilities will be protected from other uses that might restrict existing operations or their ability to expand. We think that this should be followed up within the policy itself.	Include text from paragraph 7.43 within Policy WCS9.	Accepted – policy will be amended accordingly.	Amend Policy WCS9 to refer to the possibility of future expansion.
Policy WCS9						
22744 (10157)	Support	Leicestershire County Council	Agree with the intention of this policy		Support noted.	n/a
Policy WCS10						
21667 (10153)	Support	Inland Waterways Association	Support the use of waterborne freight transport as a sustainable alternative to road transport		Support noted.	n/a
22872 (10154)	Object	Express Energy	<p>Policy WCS10 encourages the use of alternative modes of transport and minimising the distance waste is transported by road. The requirement to minimise transport distance without due regard to other sustainability criteria potentially distorts the approach to locating facilities. The Sustainability Appraisal objectives take into account factors such as air quality, congestion, and making efficient use of the highway network.</p> <p>This does not therefore equate simply to the minimisation of travel as incorporated subsequently within the policy.</p>	It is proposed that the wording "... and minimise the distance waste is transported by road" is deleted from the end of policy WCS10. Any consideration of road miles travelled by waste and the impact that this should have on the overall sustainability of a proposal would then more properly be considered within the overall context set by Policy WCS13.	Partially accepted - the supporting text to Policy WCS10 makes clear that factors such as congestion and air quality should be considered and limiting these impacts by encouraging alternatives and minimising the distance travelled by road is what the policy is designed to achieve. In this context it would undermine the aim of the policy and SO5 to remove the reference to minimising the distance travelled by road. However it is accepted that the policy and supporting text could be strengthened by the addition of references to making the best use of the existing transport network.	Amend policy to include reference to making the best use of the existing transport network.

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
21668 22803 22840 (10116)	Support	Inland Waterways Association / CPRE (Notts Branch) / Highways Agency	Support use of water-borne transport.		Support noted.	n/a
Policy WCS11						
22804 (10151)	Object	CPRE (Notts Branch)	We understand the need for this policy approach but there is no suggested restraint or limitation on applying the policy. We suggest that the policy is completed by adding the following sentence which is in strict conformity to other NCC policies: 'where its benefits are not outweighed by detrimental visual impact on the landscape character or urban form of the district or the purposes of including land within the Green Belt.'	Add the following text to Policy WCS11: 'where its benefits are not outweighed by detrimental visual impact on the landscape character or urban form of the district or the purposes of including land within the Green Belt.'	Not accepted - the policies of the Waste Core Strategy should be read as a whole. Therefore the level of protection sought by CPRE would be provided by Policy WCS12 and the saved policies of the Waste Local Plan until such time as they are replaced by new development management policies which will sit alongside the Waste Core Strategy. The addition of text repeating this within Policy WCS11 is not therefore considered necessary.	No change proposed.
22746 22878 22953 22968 23000 (10152)	Object	Leicestershire County Council / Nottinghamshire Wildlife Trust / Nottinghamshire Friends of the Earth / PAIN / Peel Environmental Ltd	The use of the phrase 'at least' within the policy implies that Nottinghamshire and Nottingham could end up importing more than their fair share of waste from other areas. Requiring proposals that are otherwise in line with an up to date development plan, to demonstrate a local or market need is contrary to guidance in PPS10. It is more relevant to focus on the sustainability benefits of the proposal rather than need. The policy wording is too vague and permissive and should not support the over-provision of incineration capacity.	Delete the phrase 'at least' from the policy. Remove all references to need.	Accepted - removal of the phrase 'at least' from the policy would make this consistent with the stated aim of providing sufficient capacity to manage the equivalent of the waste arising within the plan area and remove concerns about over-capacity. It is also accepted that requiring applicants to demonstrate need or judging a proposal that is in line with an up to date development plan on need is contrary to PPS10 (paragraph 22) and that the policy wording should be adjusted accordingly to reflect the sustainability of proposals and transportation of waste rather than a need-based assessment.	WCS11 and 7.47-49 to be reworded to recognise the suitability and sustainability of proposals rather than a need-based approach.

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
Para 7.51						
22877 (10144)	Object	Nottinghamshire Wildlife Trust	As all policies within the WCS are interrelated and contingent upon each other, it is essential that this policy is robust, as it appears to be potentially the only protective policy for biodiversity. I would expect more specific information to be included in paragraph 7.53 or paragraph 7.51, on the need to protect statutory and non-statutory sites and BAP habitats and species, and greater emphasis on the requirement to seek to achieve national and local targets for BAP habitat creation.	NWT recommend the following change to the paragraph 7.51 wording: "...Development should be located away from areas of important landscape, heritage and nature conservation value, flood-risk and unstable land. In defining "important", for biodiversity this may mean statutory or non-statutory sites (such as SINCs) and also BAP species and habitats. Waste development should seek to achieve a net gain in BAP habitats as required under PPS9, RSS8 and the NPPF and should help to deliver LBAP targets"	Partially accepted - Policy WCS12 and its supporting text form part of an overarching suite of strategic policies which will be supported by detailed development management policies and saved Waste local Plan policies in the interim. Adding this level of detail to the text would repeat guidance that is already set out elsewhere and create an imbalance as other assets such as landscape and heritage are not covered in this depth. When drafting this policy and supporting text, the Councils wished to avoid a 'long-list' of assets to be protected as this risks becoming overly prescriptive. This level of detail is therefore considered more appropriate to the development management policies document. However it is proposed to amend the wording of paragraph 7.52 to include references to biodiversity and geodiversity.	Amend paragraph 7.52 to include biodiversity and geodiversity.
22969 (10146)	Object	People Against Incineration (PAIN)	Para 7.51 The following wording does not make sense: "Consideration will also be given to whether proposals are likely to result in an unacceptable cumulative impact in combination with other waste existing development."	Replace with: "Consideration will also be given to whether proposals are likely to result in an unacceptable cumulative impact in combination with other development."	Accepted - this is a typographical error.	Correct wording to read 'in combination with other existing or proposed development'
22810 22859 (10142)	Support	The Coal Authority	Support reference within paragraph 7.51 which requires that new waste proposals should be located away from areas of unstable land.		Support noted.	n/a

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
Para 7.52						
22970 (10147)	Object	People Against Incineration (PAIN)	<p>Para 7.52 "Disruption to green infrastructure assets should be avoided..."</p> <p>The original proposed wording does not provide a clear definition of green infrastructure assets, and would therefore be ineffective.</p> <p>The reason to use the proposed definition derives from its use in other strategies, such as the Green Infrastructure Strategy for Hinckley & Bosworth, and the Green Infrastructure Strategy for Shrewsbury & Atcham.</p>	<p>Add the following: "Green infrastructure assets are areas which, by virtue of their location, their use or their management, serve one or more functions of social, economic or environmental public benefit. Assets can be defined sites, or equally can be landscapes or other broader environmental features."</p>	<p>Partially accepted – it is accepted that there should be a definition of green infrastructure to aid understanding but it is considered that this would be more appropriate within the glossary rather than within the supporting text.</p>	<p>Include definition of green infrastructure in glossary.</p>
Para 7.53						
22848 (10149)	Object	Natural England	<p>The Habitats Regulation Assessment (HRA) document submitted at preferred options stage specifies that the Core Strategy should 'provide a policy hook' to ensure that the assessment of issues not screened out by the HRA process at project stage. Whilst we recognise and welcome the clear statement that any proposal that would be likely to have a significant effect on a European site, either alone or in combination with other plans or projects, would not be in accordance with the development plan. We consider that the need for screening at project stage should be made clear.</p>	<p>Revise policy wording to make clear the need for HRA screening at the project stage.</p>	<p>Accepted - additional wording will be included to clarify the need for possible further screening. This will also need to be included within the subsequent development management policies and site-specific document.</p>	<p>Add text to end of Paragraph 7.53 to make it clear that further screening may be required for individual proposals at the project stage.</p>

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
22875 (10143)	Object	Nottinghamshire Wildlife Trust	Para 7.53 - areas of Sherwood Forest under consideration as an SPA meet the primary criterion for designation. The area should therefore be accorded a special status of being subject to a "risk-based" approach as advised by NE. In addition, the provisions of Article 4(4) of the Birds Directive should be applied. This paragraph should therefore acknowledge that these procedures would be required for any proposed developments within the buffer zone of the prospective SPA.	NWT recommend the following change to the paragraph 7.53 wording: "The Councils are aware that a possible Special Protection Area is under consideration for part of Nottinghamshire which could therefore become a candidate site. If a Special Protection Area is subsequently identified and sent to the European Commission for designation, the Councils will assess the implications of this and what action is necessary to deal with any issues raised. In the meantime the Councils will adopt NE's requirement for a "risk based" approach and to assess any applications in accordance with the requirements of the Birds Directive."	Accepted - the suggested change will provide greater clarity.	Add the following final sentence to Paragraph 7.53: 'In the meantime the Councils will adopt a "risk based" approach, as advised by Natural England, and assess any applications in accordance with the requirements of the Birds Directive.'

Policy WCS12

22857 (10145)	Object	Natural England	<p>Natural England broadly welcomes this section, particularly the recognition of the status of potential European sites. However we advise that the protection of sites of national as well as international importance is made clear in this section.</p> <p>Whilst we recognise that such constraints can be taken into account at application stage, it is important that SSSI protection is made clear at this strategic stage. Therefore, this strategy should include criteria based policies to safeguard the protection of statutory designated sites (including SSSIs), legally protected species, local wildlife sites and UK Biodiversity Action Plan (UKBAP) habitats and species, as advised previously.</p>	Include criteria based policies to safeguard the protection of statutory designated sites (including SSSIs), legally protected species, local wildlife sites and UK Biodiversity Action Plan (UKBAP) habitats and species.	Not accepted - whilst the desire to have criteria based policies to protect the assets listed is understandable, this is not considered appropriate for the Waste Core Strategy which is intended as an overarching strategic document in line with the guidance on preparing Local Development Frameworks. The level of detail sought by Natural England is already set out within the saved Waste Local Plan policies and will be replaced by a new set of development management policies which will support the strategic policies of the Waste Core Strategy. The level of protection provided will be the same but will be achieved in combination across the suite of LDF documents to be produced (Waste Core Strategy, Development Management Policies and Site Specific Document).	No change proposed.
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Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
22825 22876 22971 23017 (10148)	Object	Environment Agency / Nottinghamshire Wildlife Trust / PAIN / Nottingham Friends of the Earth	The policy wording is too positive without adequate constraints on inappropriate development. The term 'overall environmental quality is too vague and implies that environmental assets could be traded e.g. a biodiversity loss could be traded for a landscape gain. The policy should include a specific reference to protecting biodiversity.	Various alternative wordings have been put forward suggesting that the policy should stress that development would only be allowed where it would not have any unacceptable environmental impact. The phrase 'subject to other development plan policies' should be added to the policy and a cross reference to saved polices included in the supporting text.	Accepted - the implication that environmental assets could be traded for one another is unintentional. The intention of the policy is to cover all relevant environmental assets without needing to list them individually within the text as this general policy will be supported by subsequent, more detailed, development management policies and the saved Waste Local Plan policies in the meantime. Minor re-wording of the policy is proposed to provide an appropriate level of restraint and to remove the word 'overall'. As the plan and its policies should be read as a whole, it is not considered necessary to include further cross references to saved policies.	Changes to Policy WCS12 and paragraph 7.52 proposed.

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
Para 7.55						
22972 (10117)	Object	People Against Incineration (PAIN)	<p>Para 7.55 "Locally, the key impacts on waste facilities are likely to be the increased risk of flooding and storm damage...The detailed impacts will be controlled through our saved policies"</p> <p>Increases in ambient air temperature are associated with reduced efficiency in the conversion of waste to energy.</p> <p>The NPPF makes explicit reference to saved policies, e.g. Paragraph 215, and therefore the Waste Core Strategy will need to ensure that the saved policies referred to at Paragraph 7.55 and elsewhere are entirely consistent with the NPPF, and will not be given reduced weight due to inconsistency with the NPPF.</p>	<p>Add the following to the end of the first sentence: "as well as reduced efficiency for waste combustion facilities."</p> <p>The impact of the National Planning Policy Framework (NPPF) should be considered in relation to saved policies.</p>	<p>Additional text is not considered necessary as the purpose of this paragraph is to illustrate and give examples of likely issues but not to list all possible outcomes. Where necessary, greater detail will be included in the separate Development Management policies document that will follow the Waste Core Strategy.</p>	No change proposed.
Policy WCS13						
22826 (10120)	Object	Environment Agency	<p>We agree with this policy but would require it to be more explicit about flood risk to and from the development.</p>	<p>Policy should be more explicit about flood risk to and from development.</p>	<p>Partially accepted - the EA concern over flood risk is noted but it is unclear why flood risk should be identified specifically within the policy when it is intentionally worded to cover all possible impacts on and effects of climate change. To add flood risk to the policy could then make it necessary to list all other possible impacts thereby unnecessarily lengthening the policy without adding any additional protection or clarity. It is therefore considered that the current policy wording is appropriate. Flood risk is already identified within the supporting text at paragraph 7.55 and it is considered that this text can be expanded to address the EA concern.</p>	<p>Insert additional text at end of the second sentence of paragraph 7.55 to highlight the need to avoid development in the floodplain.</p>

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
22925 (10119)	Support	Ashfield District Council	The importance of climate change stressed in Ashfield's response is reflected the Vision, in the Strategic Objectives and in a specific policy in the CS, Policy WCS 13.		Support noted.	n/a
22954 22973 (10118)	Object	Nottingham Friends of the Earth / PAIN	This policy should require proposals to demonstrate that they will minimise greenhouse gas emissions.	<p>Supporting text should stress the importance of considering alternatives to move waste up the hierarchy and to reduce carbon emissions (not just to demonstrate that a particular proposal will produce less emissions than landfill).</p> <p>Add following to policy: "Planning permission will not be granted for new or extended waste management facilities where applicants fail to robustly demonstrate both that they have taken climate change into account in terms of location, design and operation of their proposed facility and that their proposal would not give rise to unacceptable climate change impacts. Planning permission will not be granted for waste combustion facilities [e.g. incineration, combined heat and power (CHP), advanced thermal treatment (ATT), gasification and pyrolysis] where applicants fail to robustly demonstrate that their proposal will support efforts to decarbonise the energy supply through the duration of the planning consent in line with the anticipated significant reduction in the carbon intensity of the electricity mix."</p>	<p>The policies of the Waste Core Strategy should be read as a whole and Policy WCS2 and its supporting text deal with the issue of sustainable waste management and the importance of moving waste management up the waste hierarchy. In the interests of producing a meaningful and concise Waste Core Strategy, it would not be appropriate to repeat these issues in this section. However additional text will be added to paragraph 7.54 to highlight the importance of sustainable waste management practices in relation to climate change.</p> <p>The existing wording of the policy requires facilities to be located, designed and operated so as to minimise any potential climate change impacts. This addresses the need to demonstrate that a proposal would not give rise to unacceptable environmental impacts. The additional policy wording sought in this respect is felt to be excessively detailed and onerous for a strategic policy although elements of this could be reflected in the later detailed, development management policies and their supporting text. No further change to Policy WCS13 is therefore considered necessary.</p>	Add following sentence to end of paragraph 7.54 'Reducing the environmental impacts of transporting, treating and disposing of waste is therefore a priority in line with the Waste Core Strategy's Strategic Objectives set out in Chapter 6.'

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
Health						
22928 (10182)	Support	Ashfield District Council	A further issue was the potential impact of waste facilities on the well-being of local communities as a key aspect in ensuring the plan is deliverable. The CS emphasises community well-being within its Strategic Objectives. Paragraphs 7.57 and 7.58 in the Core Strategy cover the issue of health.		Support noted.	n/a
Para 7.57						
22955 (10190)	Object	Nottinghamshire Friends of the Earth	A new policy on health should be added: "Proposals for facilities which may impact on human health will be required to include an assessment of potential health impacts. Where a process may produce persistent organic pollutants (POPs), applicants must demonstrate they have given priority consideration to alternative processes, techniques or practices that would avoid the formation and release of these substances." Supporting text should refer to the Rufford Colliery decision (APP/L3055/V/09/2102006, paras 1035, 1036, 1239, and 1240).	Add new policy as follows: "Proposals for facilities which may impact on human health will be required to include an assessment of potential health impacts. Where a process may produce persistent organic pollutants (POPs), applicants must demonstrate they have given priority consideration to alternative processes, techniques or practices that would avoid the formation and release of these substances." Include references to the Rufford Colliery decision in supporting text to this new policy.	Not accepted – a separate policy on health is not necessary as saved and future development management policies will control potential land use impacts to soil, air and water. Relevant planning conditions are also applied to waste management facilities on a site by site basis. Alongside planning requirements, waste facilities are regulated and monitored, or granted an exemption, by the Environment Agency (EA) - which sets limits in terms of emissions on air soil and water in relation to site specific development and also in line with international and national guidance. The EA also has controls over pollution in place through its Policy and Practice for the Protection of Groundwater. All applications will be determined using expert advice which includes the EA, local environmental health officers, the Health Protection Agency, Primary Care Trusts and other relevant bodies.	No change proposed.

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
Para 7.58						
22974 (10193)	Object	People Against Incineration (PAIN)	<p>Para 7.58 "...the primary controls over pollution are implemented through the separate environmental permitting regime..."</p> <p>The Rufford decision, at paras 1035, 1036, 1239 and 1240, sets out that it is the responsibility of the planning authority to consider alternative processes when a schemes would produce persistent organic pollutants (POPs).</p> <p>Also see Article 6 (3) of Regulation (EC) No 850/2004 of the European Parliament and of the Council of 29 April on Persistent Organic Pollutants and Amending Directive 79/117/EEC.</p>	<p>Add the following at the end of this sentence: "however when considering proposals for a facility that would release Persistent Organic Pollutants (POPs), such as an incinerator, the Planning Authority has responsibility for ensuring that priority consideration is given to alternative processes, techniques or practices that would avoid the formation and release of these substances."</p>	<p>Not accepted – the purpose of the Waste Core Strategy is to set out broad, strategic policies. The requirements of EU directives and other relevant legislation will apply to decision making in all cases and do not need to be repeated within the Core Strategy. Paragraph 7.58 already makes clear that expert advice will be sought at the appropriate stage.</p>	No change proposed.
Policy WCS14						
22939 (10175)	Object	Derek Kitson Architectural Technologist Ltd	<p>Given the likely population increase, any site that is to be identified in our county should have the scope preferably for expansion unless the sites are small and could be classified as windfall sites with an acknowledged short term gain facility.</p>		<p>Accepted - the Councils agree with this point, it is addressed specifically by Policy WCS7 which provides for the extension of facilities where appropriate. No change is therefore considered necessary to this part of the plan. However, it is felt that paragraph 7.43 could be expanded to highlight further the possibility of future expansion and that further guidance on this will be provided within the subsequent development management policies.</p>	<p>Amend paragraph 7.43 to account for future expansion where appropriate.</p>

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
22837 22975 (10141)	Object	Newark and Sherwood District Council / PAIN	As currently worded the policy is not justified or deliverable because development which could not incorporate the standards would fail the policy. It should be made clear what would constitute "sustainable construction measures".	Include the phrase 'Wherever possible, or appropriate' at the start of the policy. Define what is meant by 'sustainable construction measures'.	Not accepted - design is an important issue and it is reasonable that any proposals that are of poor quality should fail this policy test. Including a phrase along the lines of 'wherever possible...' could be seen as weakening the policy. As the policy goal here is to encourage sensitive and good quality design and landscaping, it is felt that this should rightfully apply to all proposals. A definition of 'sustainable construction measures' is considered unnecessary in this context as more detailed policies will be contained in a later development management policy document.	No change proposed.
Plan 4						
22926 (10184)	Support	Ashfield District Council	The key diagram has been clarified so that it removes what appear to be allocations to specific population centres.		Support noted.	n/a
23009 (10215)	Object	Mr J Potter	The mapping is too schematic		Not accepted - the mapping is intended to be schematic.	No change proposed.
22976 (10210)	Object	People Against Incineration (PAIN)	No robust evidence is provided to support the "disposal shortfall area" boundary and designation.	Remove reference to a "disposal shortfall area".	Not accepted – the disposal shortfall area is referenced in Policy WCS4, it is an indicative area and representation on the Key Diagram is valid. No greater geographic precision is considered necessary to guide provision.	No change proposed.

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Chapter 8

22761 22765 (10198)	Object	Caring About South Kirkby / Friends of Kingsway Park	The strategy should be reviewed regularly to reflect changes in EU and Government policy and legislation, 'green' policies and continuous changes within the waste management industry. Reliable and robust data should be used. The Strategy should be considered a 'living document' and so be subject to a review every, say, 3 years to ensure that WCS8 is a meaningful policy.	Review every 3 years	Not accepted - review of the Plan is built into the Regulations covering preparation and should be undertaken in response to monitoring, which is done annually. WCS8, in the way it is worded, would not become redundant or need review after a certain length of time.	No change proposed.
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Para 8.1

22977 (10200)	Object	People Against Incineration (PAIN)	<p>Para 8.1 "Regular monitoring is essential to ensure that our policies are effective, being applied consistently and having the intended effect..."</p> <p>The Strategy should abide by the guidelines in PPS10 and the associated Companion Guide, in particular guidance from PPS10, Paragraph 4.</p>	The Strategy should explicitly state that annual monitoring reports will be produced and made available to the public, and that these reports should include an assessment of the relevant indicators, and that reviews should take place at least every five years, or more frequently if necessary.	Accepted - clear reference will be made to annual monitoring in accordance with PPS10 and the NPPF. Reviews of the Plan will be governed by the Regulations covering plan preparation and annual monitoring findings.	Amend paragraph 8.1 to refer to annual monitoring and review in line with PPS10 and the NPPF.
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Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
<i>Table 7</i>						
22384 (10191)	Support	Waste Recycling Group	<p>Table 7 WCS2 states 20% MAX energy recovery which suggests that there is a policy barrier to recovering energy whereas the main WCS text suggests that this is a target based on the aspiration of recycling 70% of wastes but that if this is not achievable the balance would be made up from energy recovery or disposal.</p> <p>The use of MAX is misleading for both energy recovery and disposal as it is a possibility, as acknowledged in the WCS, that these figures may need to adjust to cover any shortfall in meeting the ambitious recycling target</p>		Accepted – monitoring indicator will be amended to remove discrepancy.	Amend indicators to remove the term 'Max'
22982 (10207)	Object	People Against Incineration (PAIN)	<p>"WCS13 Climate change...New proposals are resilient to climate change."</p> <p>Whilst climate change impacts on waste facilities must be considered, consideration should also be given to the impact of waste management on climate change.</p> <p>This could be monitored through keeping track of planning refusals on climate change impact grounds.</p>	Add indicator relating to reducing harmful climate change impacts.	Accepted - monitoring indicator will be amended to refer to climate impacts.	Add reference to harm to indicator in Table 7.

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
22805 (10203)	Object	CPRE (Notts Branch)	Targets are unambitious. WCS1 - absence of specific targets is not acceptable. There is nothing to monitor against. Broad target dates for setting up waste reduction schemes should be defined. WCS2 - green garden waste should have separate reduction and monitoring. WCS10 - targets most unimpressive! There should, at least, a requirement that a defined number of non-road means of transportation will be examined in conjunction with the industry. HGV movement 'avoided' by proposals should also be assessed, as well as those movements 'replaced'.	WCS1 - include specific targets/broad dates for waste reduction schemes. WCS2 - include separate target on green waste. WCS10 - define means of non-road transportation. Measure number of HGV movements as well as replaced.	Partially accepted; Some targets could be developed but this would be through the annual monitoring report. Separate Green garden waste monitoring is feasible and would inform municipal waste information.	Targets will be developed and refined through the annual monitoring report.
22978 (10283)	Object	People Against Incineration (PAIN)	WCS1 Waste Prevention' Successful waste prevention should result in a reduction in waste arisings.	Quantities of Municipal, and C&I waste arisings should be monitored. Add: "Local Authority Collected Municipal Waste" as an indicator.	Accepted – suggested arisings indicators will be included.	Add indicators on waste arisings for municipal, commercial and industrial and construction and demolition waste.
22979 (10205)	Object	People Against Incineration (PAIN)	WCS2 "Energy recovery" and "Disposal" need to be better defined, so that these can be measured, monitored and managed. Further clarification is required to ensure that metrics are as intended, for example: Will incinerator ash and residues sent to landfill count towards the tonnes of waste disposed? If 10% of waste arising is sent to MBT resulting in the halving of its volume and then subsequently landfilled - would this result in ~10%, ~5% or ~0% being considered to have been disposed of by landfill?	"Energy recovery" and "Disposal" need to be better defined.	Not accepted – the terms are already defined within the glossary. How ash and other residues are calculated will be in accordance with Government guidance. As this has changed over different monitoring periods previously and may change again in response to further research etc., it is not proposed to define this within the monitoring chapter. Strict definitions of monitoring will be included in annual monitoring reports.	No change proposed.

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
22980 (10282)	Object	People Against Incineration (PAIN)	WCS7 Extensions to waste management facilities...No actual local assessment if extensions are generally suitable'. The meaning of this statement is not currently clear. What would a local assessment be expected to assess, and how would general suitability be determined, especially without an assessment?		Accepted – indicators will be revised to clarify how extension swill be monitored.	Amend monitoring indicators/targets for this policy focus on amount of additional capacity provided via this policy and remove unclear wording.
22981 (10206)	Object	People Against Incineration (PAIN)	"WCS11 Self sufficiency...Any large scale proposal will help fulfil this policy (assuming it mainly takes local waste)." Self-sufficiency would not result from local facilities that would give rise to "waste outputs" that would need to be exported outside the Strategy Area, e.g. RDF, incinerator bottom ash, air pollution control residue, etc.	Remove the sentence: "Any large scale proposal will help fulfil this policy (assuming it mainly takes local waste)".	Accepted - comment is unnecessary.	Remove the sentence: 'Any large scale proposal will help fulfil this policy (assuming it mainly takes local waste)'. Self-sufficiency would not result from local facilities that would give rise to "waste outputs" that would need to be exported outside the Strategy Area, e.g. RDF, incinerator bottom ash, air pollution control residue, etc.
Glossary						
22815 (10275)	Object	Environment Agency	We consider that the glossary should contain the definition of all waste types discussed in section 4 - not just municipal waste.	Include additional waste definitions within the glossary to cover all of the waste types referred to within the document.	Accepted	Insert additional definitions to cover waste streams.
22986 (10199)	Object	People Against Incineration (PAIN)	Mechanical biological treatment - In our understanding MBT does not include incineration, gasification or pyrolysis.	Remove reference to "incineration, gasification or pyrolysis".	Accepted.	Change the glossary entry for 'Mechanical Biological Treatment' by removing the second sentence that reads '...This can also include energy recovery in the form of incineration, gasification pr pyrolysis'

Rep No. <i>(Response No.)</i>	Nature	Respondent(s)	Summary of Representation(s)	Change(s) Sought	Councils' Response	Councils' Proposed Change(s) to Plan
22983 (10277)	Object	People Against Incineration (PAIN)	<p>Disposal</p> <p>Value can be extracted from landfilled waste through landfill mining for future recycling and capturing gas to produce energy.</p> <p>Furthermore, in some instances waste is landfilled that should have been recycled. Up to up to 97.5% of the C&I waste landfilled in the North West region could be recycled. It is therefore incorrect to describe waste landfilled as necessarily having "no useful or economic purpose"</p> <p>As explained in Paragraph 2.3 of the Proposed Submission Document, only facilities that exceed the R1 threshold "qualify as recovery rather than disposal operations".</p>	The definition of disposal should acknowledge both the potential for landfill mining, landfill gas capture, and the fact that incinerators that do not qualify as recovery are classed as disposal.	Not accepted - disposal is referred to here in the context of planning for facilities for the deposit of waste above or below ground in relation to policies WCS3, 4, 5 and 6 which require different planning considerations to those for built development. There is no need to reference legal terminology/classifications that are already set out within the EU Directive. , a reference to landfill mining within the 'other recovery' category of the waste hierarchy diagram shown in Figure 2.2 is already proposed in response to a separate representation.	No change proposed.
22984 (10276)	Object	People Against Incineration (PAIN)	<p>Energy recovery</p> <p>"Energy recovery" is a term that can be used loosely to mean a wide range of things. The definition given within the Glossary is unclear and seems to be inconsistent with the term's usage elsewhere in the document.</p> <p>Policy WCS2(b) uses the term "Energy Recovery Facility" (which is not itself defined) and this seems to include waste incineration (including gasification and pyrolysis) but not AD, and may or may not include various forms of MBT or RDF processing.</p> <p>Similarly, it is unclear whether or not AD, MBT-Landfill, RDF processing, etc are included within the "20% max energy recovery" target in WCS2.</p>	The definition of energy recovery needs to be amended to make it clear and consistent with the way that the term is used in the rest of the document.	Not accepted - the technologies referred to by PAIN are already specified within the definition.	No change proposed.

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22985 (10201)	Object	People Against Incineration (PAIN)	Greenfield site - To ensure the definition is consistent with the National Planning Policy Framework.	The definition of a Greenfield site should make explicit reference to the Greenfield status of former collieries with restoration conditions.	Not accepted - the NPPF does not contain a definition of what a Greenfield site is. It is considered that the WCS Proposed Submission Document Glossary provides a clear definition of what a Greenfield Site is.	No changed proposed.

Appendix 2

Table 8

22987 (10278)	Object	People Against Incineration (PAIN)	The medium sized facilities indicative capacity should be a range and not a single figure, for the avoidance of doubt.	To convert the "medium" indicative capacity to a range to fall between the "large" and "small" capacities.	Accepted - this would provide additional clarity.	Amend the medium capacity range as suggested.
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