

Appendix 1 – Summary of Representations to the Hertfordshire Waste Local Plan Initial Consultation 2018

Table 1: Vision – Issues 1-2

General Statement covering Issues 1 & 2:

The draft Vision was widely support by consultees who agreed that multiple aspects of national policy and Hertfordshire County Council’s own priorities were covered.

The County Council is proposing to make the Vision more locally distinctive by mentioning the Herts Waste Partnership as an important stakeholder of waste management in the county and by briefly explaining key aspects of Hertfordshire’s waste industry including the distinctive relationship with London regarding waste movements. Some suggestions of minor rewording will also be implemented.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
Issue 1				
Which aspects of national policy and Hertfordshire County Council priorities does the Vision cover adequately? (Please select all that apply)				
<ul style="list-style-type: none"> <input type="radio"/> Planning positively <input type="radio"/> Driving towards sustainable development and economic growth <input type="radio"/> Locally distinctive to Hertfordshire <input type="radio"/> Provides a vision for what the county will be like in 20 years <input type="radio"/> Based on current trends and trajectories <input type="radio"/> Clear <input type="radio"/> Concise <input type="radio"/> Realistic <input type="radio"/> Measurable <input type="radio"/> Provides points that can be translated into policy <input type="radio"/> Shared vision for future development <input type="radio"/> Meets the needs of the communities <input type="radio"/> Citizen focussed <input type="radio"/> Acting with integrity <input type="radio"/> Getting things right <input type="radio"/> Innovative 				

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
<ul style="list-style-type: none"> ○ Every penny counts ○ Any other comments 				
WLPIC0001	Royston Council	1	Positive Sustainable Locally distinctive 20 year vision Current trends Clear Concise Realistic Measurable Translates to policy Shared Community needs Citizen focussed Acts with integrity Getting things right Innovative Every penny counts	Selections noted.
WLPIC0030	Herts and Middlesex Wildlife Trust	1	<ul style="list-style-type: none"> • Regarding the natural environment, the vision statement does not adequately reflect the aims of sustainable development. • Clear indication in the vision that waste management planning will avoid, mitigate or compensate ecological impacts so that net gain to biodiversity will be achieved in a measurable way, should be included • Net gain to be claimed it must be measured and the key to this is to stipulate the mechanism by which it should be determined in all strategic planning documents. • An indication that ecological impacts must be net 	Agree with the inclusion of "and enhancement" regarding biodiversity. It is considered that the additional details provided in this representation, including the correct mechanism to achieve net gains in a measurable way, can be reflected in the policies and supporting text which will be included in the Regulation 18 Draft WLP.

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			<p>positive is required.</p> <ul style="list-style-type: none"> • Suggested change: • 'There will be a flexible and supportive plan based approach towards waste management facilities, embracing modern technologies that reduce carbon emissions. Sustainable development will be achieved through the consideration of sustainable transport links, protection and enhancement of the county's biodiversity resulting in measurable net gain, and protection of the built and historic environments. Through this a healthy community environment in Hertfordshire will be maintained. 	
WLPIC0036	Hampshire County Council	1	<p>Positive Sustainable Locally distinctive 20 year vision Current trends Clear Concise Realistic Measurable Translates to policy Shared Community needs Citizen focussed Acts with integrity Getting things right Innovative Every penny counts</p>	Selections noted.
WLPIC0053	Chilterns Conservation Board	1	<p>Positive Sustainable Locally distinctive 20 year vision</p>	Selections noted.

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			Current trends Clear Concise Translates to policy Shared Community needs	
WLPIC0066	North Hertfordshire District Council	1	Positive Locally distinctive Current trends Clear Concise Realistic Measurable Translates to policy Shared Community needs Citizen focussed Acts with integrity Getting things right	Selections noted.
WLPIC0090	Watford Borough Council	1	Positive Sustainable 20 year vision Realistic Translates to policy Community needs Getting things right <ul style="list-style-type: none"> • Too long. • Implies HCC is failing to balance in-flows and out-flows (and proposes to correct that) but it gives no detail as to how wide the gap is. • Paragraph 4.4 contradicts vision. 'Manage waste movements' impossible. 	Selections and comments noted. The gap between imports and exports of waste is set out in the Draft Waste Capacity Gap Report (2017) and will be updated as Plan production progresses. The third paragraph does not propose to balance waste movements as it is considered unfeasible to do so due to the proximate location of London and the large quantity of waste exported from London. Until London becomes net self-sufficient, exports from London to Hertfordshire are expected to far exceed those of Hertfordshire into London. The Draft

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				London Plan does commit London to plan for net self-sufficiency but this is not expected to occur immediately due to London's own significant waste capacity gaps and constraints on development. Agree that the word 'manage' is misleading. It is intended to refer to the management of the imported/exported waste in line with the Duty to Cooperate.
WLPIC0118	Three Rivers District Council	1	Positive Sustainable Locally distinctive 20 year vision Current trends Clear Concise Realistic Measurable Translates to policy Shared Community needs Citizen focussed Acts with integrity Getting things right Innovative Every penny counts	Selections noted.
WLPIC0145	Stevenage Borough Council	1	Positive Sustainable Clear Realistic Measurable Translates to policy Shared	Selections noted. It is considered that the additional details on priorities can be reflected and are more appropriate in the policies and supporting text which will be drafted and included in Regulation 18 Draft WLP.

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			The Vision could be more explicit in its intention to meet the priorities set out above.	
WLPIC0174	HCC Historic & Built Environment	1	The Natural, Historic & Built Environment Advisory Team supports the inclusion of the historic environment in the vision, as per National Planning Policy for Waste, appendix b part e.	Comment noted.
WLPIC0242	Chiltern Society	1	<p>Positive Sustainable 20 year vision Current trends Clear Concise Translates to policy</p> <ul style="list-style-type: none"> • Vision should include reference to the County's high quality landscape and Green Belt. • The protection of the Chilterns (including the AONB) and the Green Belt could then be protected by more detailed objectives and policies later in the Plan. • The Plan needs to reflect paragraphs 115 and 116 of the NPPF and to fulfil the Council's duty to have regard to the purpose of conserving and enhancing natural beauty under Section 85 of the Countryside and Rights of Way Act 2000 	<p>Selections noted. Landscape and Green Belt are not considered to require specific mention in the overarching Vision and are incorporated by the term 'natural, built and historic environment'. They will be expanded upon within policies that will be drafted and included in the Regulation 18 Draft WLP. The emerging WLP will be prepared to reflect the NPPF/NPPG or replacement national planning policy.</p>
WLPIC0271	CEMEX UK	1	<p>Positive Sustainable 20 year vision Current trends Clear Concise Realistic Measurable Translates to policy</p>	Selections noted.
WLPIC0287	Bell Cornwell (on	1	Positive	Selections noted.

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	behalf of Dundenes Limited		Sustainable Clear Concise Measurable Translates to policy	
WLPIC0297	David L Walker Ltd (on behalf of Tarmac)	1	Positive 20 year vision Realistic Translates to policy <ul style="list-style-type: none"> • There is no flexibility about the aspiration for zero waste. This is not realistic nor practical. • The vision should be more positive about locating, designing and operating waste facilities without adverse impacts of local environs and communities. 	Selections noted.
WLPIC0353	HCC Ecology	1	Positive Sustainable Locally distinctive 20 year vision Current trends Clear Concise Realistic Measurable Translates to policy Shared Community needs Citizen focussed Acts with integrity Getting things right Innovative Every penny counts <ul style="list-style-type: none"> • Some of the issues above cannot be demonstrated to be achieved at this stage. 	Selections noted. Mechanisms for demonstration will be developed as Plan-production progresses. The Waste Capacity Gap Report being developed to support the emerging WLP will identify what and how much waste will require management. Agree that it is not appropriate to include details for waste arisings in the Vision but a general overview could be added to the third paragraph of the Draft version.

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			<ul style="list-style-type: none"> • In respect of waste itself, it is how much, what it is and how this can be best managed or reduced. Some of these issues are beyond the control of HCC. • Changing people's behaviour is important. 	
WLPIC0447	Historic England	1	We are pleased to see that the draft Vision makes reference to the need for development to be sustainable by considering the natural, built and historic environment.	Comment noted.
WLPIC0498	Transition Town Letchworth	1	Sustainable Concise Translates to policy <ul style="list-style-type: none"> • Vision should be more aspirational and more specific about the future. The Vision only commits to managing the same amount of waste as generated in the county. • Vision is not innovative, will not be good for climate change and will be expensive so cannot be considered citizen focussed. 	Selections and comments noted. The Waste Planning Authorities in the East of England have agreed to plan for net self-sufficiency and the emerging WLP will commit to managing the same amount of waste as generated in the county.
WLPIC0529	North Mymms Parish Council	1	The Draft Vision proposed by HCC is good and most of the options in Issue 1 are covered.	Comment noted.
Issue 2 Are there any other aspects that the Vision should cover? <ul style="list-style-type: none"> ○ No ○ Yes 				
WLPIC0002	Royston Council	2	Yes – Awareness of the Herts Waste Partnership.	See General Statement
WLPIC0037	Hampshire County Council	2	No -	Selection noted.
WLPIC0091	Watford Borough Council	2	Yes – It does not seem to be distinctive or particular to	See General Statement.

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			Hertfordshire.	
WLPIC0146	Stevenage Borough Council	2	No -	Selection noted.
WLPIC0196	Welwyn Hatfield District Council	2	Yes – <ul style="list-style-type: none"> • In line with the NPPF (Para 14, 79) and NPPW (Para 6) the WLP Draft Vision should include specific reference to the importance of protecting both the openness and permanence of the Green Belt and human health. 	It is not considered necessary to include mention of Green Belt in the Vision. Green Belt is incorporated within the term "natural, built and historic environments" and will be the subject of policy/ies which will be drafted and included in Regulation 18 Draft WLP.
WLPIC0197	Welwyn Hatfield District Council	2	Yes – <ul style="list-style-type: none"> • Support the aspirations of the vision. • Vision could be more locally distinctive, focussing on the key issues of what will happen, where, when and how during the life of the WLP. • With regards to self-sufficiency we consider that this should incorporate the concept of offsetting and that there should be specific reference to this in the vision. 	See General Statement. It is considered that details of what will happen during the Plan-period should be included in the introduction, supporting text and policies rather than in the brief, overarching Vision. Net self-sufficiency will be a central aim of the WLP. The focus on net self-sufficiency shows that the WPA acknowledges that cross-boundary movement of waste cannot be prevented. By planning for net self-sufficiency, the WPA will plan to provide sufficient opportunities to manage waste as part of the wider region's waste management network. It is not considered necessary to mention 'off-setting' in the Vision as it is an inherent part of net self-sufficiency will be explained fully in the description of net self-sufficiency within the text of the emerging WLP.
WLPIC0229	Savills on behalf of Thames Water Utilities Ltd	2	Yes – <ul style="list-style-type: none"> • WLP should plan for wastewater too as set out in NPPG. 	Wastewater requirements are closely aligned to the proposals for residential development in district and borough Local

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			<ul style="list-style-type: none"> • Growth in Herts will increase volume of wastewater produced. • WLP and Vision should ensure consideration is given to increasing wastewater treatment requirements. 	Plans. Wastewater is a key infrastructural consideration in all the emerging Local Plans and as such, the need for additional facilities/capacity should be raised via duty to cooperate meetings and any additional facility locations made known through the Waste Local Plan process.
WLPIC0243	Chiltern Society	2	Yes - See Comment to Issue 1	<p>Selection noted.</p> <p>The landscape and Green Belt are not considered to require specific mention in the overarching Vision and are incorporated by the term 'natural, built and historic environment'. They will be expanded upon within policies that will be drafted and included in the Regulation 18 Draft WLP.</p> <p>The emerging WLP will be prepared to reflect the NPPF/NPPG or replacement national planning policy.</p>
WLPIC0288	Bell Cornwell (on behalf of Dundenes Limited)	2	No -	Selection noted.
WLPIC0298	David L Walker Ltd (on behalf of Tarmac)	2	<p>Yes –</p> <p>The vision does not provide any flexibility about the aspiration for zero waste. This is not considered to be realistic nor practical. The vision also needs to be more positive about locating, designing and operating waste facilities without adverse impacts of local environs and communities.</p>	The emerging WLP does not aim to achieve Zero Waste. The emerging WLP, along with all other Waste Local Plans in the East of England and the emerging London Plan, will plan for net self-sufficiency which is an important step towards the longer term target of Zero Waste stated in the Government's 25 Year Environment Plan.
WLPIC0326	Iceni Projects (on behalf of BP)	2	<p>Yes –</p> <p>The Vision should recognise the requirement for the</p>	<p>See General Statement.</p> <p>It is considered that the CD&E capacity</p>

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	Mitchell)		allocation of additional waste management sites, particularly in respect of C, D & E waste	gap and allocation of sites will be reflected in the policies, supporting text, and site allocations rather than the Vision.
WLPIC0354	HCC Ecology	2	<ul style="list-style-type: none"> Proposed economic growth will exacerbate waste generation. Waste should also be managed at source. 'There needs to be some fundamental choices which need to be recognised, let alone addressed.' 	Comments noted.
WLPIC0382	Canal & River Trust	2	Yes – The vision and objective 2 should seek the use of sustainable transport links not simply their 'consideration'.	Agree that minor rewording could make this stronger. The term "use of sustainable transport where appropriate" could be used instead of "consideration".
WLPIC0384	Canal & River Trust	2	Yes – The vision should seek the protection and enhancement of the County's wildlife habitats, and natural, built and historic environments, in accordance with the NPPF and the Council's own sustainability appraisal objectives.	Agree with the inclusion of "and enhancement".
WLPIC0388	Biffa Waste Services	2	<p>Yes –</p> <ul style="list-style-type: none"> We support the principles of the Waste Hierarchy (which still recognises the importance of landfill) but consider that there is no such thing as "zero waste" - "avoidable waste" is a preferable term as used in the Government 25 Year Environment Plan. The London Plan estimates landfill capacity in the region will become exhausted by 2026. The emerging HCC WLP should accept that Hertfordshire will receive waste from London due to their own inadequate network for landfill and incineration facilities. Landfill in Hertfordshire will continue to provide a supporting role. 	Agree the term 'zero avoidable waste' has been included in the Government's 25 Year Environment Plan since the publication of the WLPIC document. Given the vulnerability of the ground water in Hertfordshire, it is unlikely that any area would be suitable for landfill other than inert material. It is proposed that the WLP will continue to have a landfill and land raise policy. Equally, the Draft Minerals Local Plan contains a policy regarding restoration with inert material.
WLPIC0421	Chilterns Conservation	2	Yes – The Vision should refer to the nationally protected	The Chilterns AONB is not considered to require specific mention in the overarching

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	Board		landscape of the Chilterns Area of Outstanding Natural beauty.	Vision and is incorporated by the term 'natural, built and historic environment'. They will be expanded upon within policies that will be drafted and included in the Regulation 18 Draft WLP.
WLPIC0425	HCC Waste Management and Environmental Resource Planning	2	Yes – A Member-led process for adoption and a mandate from all waste and planning authorities is required to formally adopt a Vision with this position.	The Vision, as with all aspects of the emerging WLP, must be agreed by elected Members through HCC Cabinet Panel, Cabinet and County Council decision-making processes at all consultation stages of Plan production. All Hertfordshire's planning authorities and members of the Herts Waste Partnership have been, and will continue to be, consulted and their representations will be taken into account in further stages of Plan-production.
WLPIC0448	Historic England	2	<ul style="list-style-type: none"> • Vision would be strengthened by referring to the need to conserve or enhance the historic environment rather than merely considering it. • This will better reflect the objectives NPPF. 	Agree the term 'consider' could be strengthened.
WLPIC0461	Essex County Council	2	<p>Yes –</p> <ul style="list-style-type: none"> • ECC welcomes the references to the proximity principle, net self-sufficiency and the Waste Hierarchy. It is noted that the concepts of net self-sufficiency and the Waste Hierarchy feature in the Plan Vision. • The emerging Vision is considered to be an effective, sustainable and policy compliant approach to delivering waste management across Hertfordshire. 	Comments noted.
WLPIC0485	HCC Natural Historic and Built	2	<p>Yes –</p> <ul style="list-style-type: none"> • The reference to the Natural, Historic and Built 	Comments noted. Agree the term 'protection' could be strengthened.

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	Environment		<p>Environment is fully supported.</p> <ul style="list-style-type: none"> • To demonstrate 'environmental net gain' through development, as promoted within the Governments recent 25 Year Environment plan, the vision should seek to protect, conserve and enhance the environment. • Conserve and enhance' also reflects the language of the NPPF. 	
WLPIC0492	HCC Public Health	2	<p>Yes – The Draft Vision may benefit from a more explicit reference to the link between waste management and health. This could be achieved in the final paragraph through: “ Sustainable and healthy development will be achieved through the consideration of sustainable transport links, health impact, protection of the County’s wildlife habitats, and natural, built and historic environments”</p>	Comments noted. Health is already incorporated into paragraph 4 but could be reinforced with wording provided in representation.
WLPIC0499	Transition Town Letchworth	2	<p>Yes – The Vision should be to deliver a substantial circular economy by 2031, including a target of waste reduction delivered by waste reduction and reuse activities. The Vision should attract recycling and reuse companies to the county and it should be clear what happens to residual waste before near-Zero Waste is achieved.</p>	The emerging WLP will continue to encourage waste reduction and reuse. However, the WLP primarily considers waste management at other levels of the Waste Hierarchy which are more closely related to land-use issues. Waste reduction and reuse are behavioural issues not requiring waste land-use and as such, they should not be the focus of the vision of the emerging WLP.
WLPIC0526	North Mymms Parish Council	2	<p>Yes – HCC must set out a clear vision to aim for net self-sufficiency in the County.</p>	The vision sets out that net self-sufficiency is a key aim of the WLP. Supporting text, policies and potential site allocations will expand on how this is to be achieved.

Table 2: Objectives – Issues 3-4

General Statement covering Issues 3 & 4:

The main concern of the consultation is to ensure that all aspects of the draft Vision are incorporated into the list of objectives. Ideally, this should not require an increase in the number of objectives, nor the significant lengthening of individual objectives.

There were requests for additional detail to be included in a number of objectives, however it is considered that this detail can be reflected in the policies and supporting text. There will be minor changes to terminology to improve the Objectives' clarity.

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Issue 3 Would meeting all of the draft Objectives ensure that the Vision presented in Chapter 5 is achieved? <ul style="list-style-type: none"> ○ Yes ○ No 				
WLPIC0003	Royston Council	3	Yes -	Selection noted.
WLPIC0048	Hampshire County Council	3	Yes -	Selection noted.
WLPIC0054	Chilterns Conservation Board	3	No – Objective 2 should refer to the nationally designated landscape of the Chilterns AONB.	The Chilterns AONB is a part of Hertfordshire's natural, built and historic environment so is included in Objective 2. It is considered more appropriate to include a more specific mention of the AONB in supporting text and policy rather than the overarching Objectives in the emerging WLP.
WLPIC0067	North Hertfordshire District Council	3	No – No, the expansion of current objectives or the drafting of additional to cover community engagement, the achievability of zero-waste and the resolving of the capacity gap.	Community involvement has two strands. When community involvement refers to consultation of Plan-production or the determination of planning applications, consultation will be undertaken in line with the relevant Regulations and the County

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				<p>Council's Statement of Community Involvement. It is therefore not considered necessary to include as an Objective of the emerging WLP. When community involvement refers to the education of members of the public (and other stakeholders) or the mobilisation of waste awareness initiatives, the emerging WLP will include wording in policy to promote this but it is more significant responsibility of the Herts Waste Partnership rather than the Waste Planning Authority. As such it is not considered necessary to include as part of one of the overarching WLP Objectives.</p> <p>The emerging WLP does not aim to achieve Zero Waste. The emerging WLP along with all other Waste Local Plans in the East of England and the emerging London Plan, will plan for net self-sufficiency which is an important step towards the longer term target of Zero Waste stated in the Government's 25 Year Environment Plan.</p> <p>Objective 9 already reflects the objective to resolve the identified capacity gap.</p>
WLPIC0092	Watford Borough Council	3	Yes – Second half of Obj 1 should be reworded. Objective 6 should be first.	Agree minor re-wording of Objective 1 is required. Waste facilities do not drive waste management practices up the Waste Hierarchy; they facilitate/allow changes in consumer behaviour which drive waste management up the Waste Hierarchy. Objective 1 should be slightly

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				amended to reflect this. Removing the commas will also make the Objective easier to read.
WLPIC0119	Three Rivers District Council	3	Yes -	Selection noted.
WLPIC0147	Stevenage Borough Council	3	No – Net self-sufficiency should be reflected in the Objectives. Modern technologies should also be mentioned.	Agree that the term "Net self-sufficiency" could be included in Objective 9 which does already reflect net self-sufficiency without specifically including the term. Agree that modern technologies could be incorporated in Objective 1 as long as the focus doesn't preclude the development of well-designed and efficient technologies that are already established.
WLPIC0173	HCC Historic & Built Environment	3	- The Natural, Historic & Built Environment Advisory Team supports Objective 2, which includes the protection of the historic environment as per National Planning Policy for Waste, appendix b part e.	Comment noted.
WLPIC0198	Welwyn Hatfield District Council	3	Yes – WHBC supports the proposed objectives, which are considered to be generally in line with the Draft Vision	Comment noted.
WLPIC0230	Savills on behalf of Thames Water Utilities Ltd	3	No – It is considered that an objective should be included regarding wastewater along the lines of 'Support the delivery of wastewater treatment infrastructure necessary to accommodate growth whilst protecting the environment.'	Wastewater requirements are closely aligned to the proposals for residential development in district and borough Local Plans. Wastewater is a key infrastructural consideration in all the emerging Local Plans and as such, the need for additional facilities/capacity should be raised via duty to cooperate meetings and any additional facility locations made known through the Waste Local Plan process. However, it is considered that the

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				provision of additional wastewater facilities/capacity is incorporated in Objectives 2 and 3 as drafted in the WLPIC document.
WLPIC0244	Chiltern Society	3	No – Objective 2 should refer to high quality landscapes so it is absolutely clear that like the Chilterns would be considered in developing waste policies.	The Chilterns AONB will be mentioned in policy/ies which will be drafted and included in Regulation 18 Draft WLP.
WLPIC0258	Jane Orsborn Associates on behalf of Mr A Pinkerton of A F Pinkerton & Partners	3	No – We doubt whether a recycling target of 65% for green waste is sufficient to ensure the vision is achieved	Comment noted.
WLPIC0289	Bell Cornwell (on behalf of Dundenes Limited	3	Yes -	Selection noted.
WLPIC0299	David L Walker Ltd (on behalf of Tarmac)	3	No – There is limited reference to the capacity gap or the need to allocate capacity and sites. This underpins sustainable waste management identified as part of the vision.	The identified Capacity Gaps and sites for allocation will be described in detail within supporting text and policy which will be drafted and included in the Regulation 18 Draft Waste Local Plan.
WLPIC0327	Iceni Projects (on behalf of BP Mitchell)	3	Yes -	Selection noted.
WLPIC0355	HCC Ecology	3	- Implementation of the Waste hierarchy should be higher up the Objectives	The Objectives are not ordered in priority.
WLPIC0449	Historic England	3	- • Objective 2 only refers to the protection of Hertfordshire's historic environment and does not include provision to encourage its enhancement and does not consider the implications of sites bordering	Agree the term 'protection' could be strengthened. If a site assessment methodology is considered appropriate at a later stage of Plan-production, it will be reflect the need

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			<p>other counties.</p> <ul style="list-style-type: none"> • Advocate an approach to site selection which seeks to consider the historic environment from the outset and which seeks to avoid harm in the first instance. • Concerned that the wording of this objective does not adequately reflect the 'key strands' of sustainable development outlined within the NPPF -compromising the ability of the Vision to be achieved. 	<p>to protect the historic environment. Comment about sustainable development noted</p>
WLPIC0500	Transition Town Letchworth	3	<p>No –</p> <ul style="list-style-type: none"> • It should be worded more strongly, starting with "We will..." rather than using terms such as 'encourage' or 'support'. The Vision should be signed up to by all members of the Hertfordshire Waste Partnership. As written, minor improvements will achieve the Objectives. • The Objectives should clearly state that materials will be kept in use rather than consumed inefficiently for energy. A specific Objective stating how residual waste will be managed is required. 	<p>The Development Plan is adopted to guide development promoted by individuals or organisation/businesses. As such it would be inappropriate to use misleading, stronger language in the Vision or Objectives. The WLPIC deals with significantly more waste than just the LACW stream managed by members of the Herts Waste partnership. As such it would be inappropriate for some, and not all, stakeholders' to sign up to. However, all Hertfordshire's planning authorities and members of the Herts Waste Partnership were consulted on the WLP Initial Consultation document and their representations will be taken into account in further stages of Plan-production. They will continue to be consulted at every stage of Plan-production and potential as part of additional informal consultations. The emerging WLP cannot ensure materials will be kept in use. The inclusion of the Waste Hierarchy in Objectives 1, 4 and 6 and the policies that will be drafted</p>

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				to implement these objectives ensure that the WLP will help to deliver land-use developments that push materials further up the waste hierarchy which incorporates reduction and reuse.
Issue 4				
Has the County Council developed the correct set of Objectives?				
<input type="radio"/> Yes <input type="radio"/> No				
WLPIC0004	Royston Council	4	Yes -	Selection noted.
WLPIC0031	Herts and Middlesex Wildlife Trust	4	No – <ul style="list-style-type: none"> • Must be made clear that waste management will achieve measurable net gain to biodiversity, in accordance with existing and emerging government planning policy. • Alter Objective 2 and create a new objective achieving this. Current objectives not specific enough to indicate that measurable net gain must be achieved. • Obj 2: Promote the location of well-situated waste facilities to ensure minimal harm to human health, natural, built and historic environments. • Obj 3: Ensure waste management proposals achieve a measurable net gain in biodiversity. 	It is considered that the correct mechanism to achieve net gains in a measurable way is in the policies and supporting text which will be drafted and included in the Regulation 18 Draft Waste Local Plan.
WLPIC0049	Hampshire County Council	4	Yes -	Selection noted.
WLPIC0055	Chilterns Conservation Board	4	No – <p>Objective 2 should refer specifically to the nationally protected landscape of the AONB.</p>	The Chilterns AONB is a part of Hertfordshire's natural, built and historic environment so is included in Objective 2. It is considered more appropriate to

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				include more specific mention of the AONB in supporting text and policy, rather than the overarching Objectives. These will be drafted and included in the Regulation 18 Draft Waste Local Plan.
WLPIC0068	North Hertfordshire District Council	4	Yes – The policies that are drafted are reasonable however they should be expanded as discussed in Issue 3 [Rep WLPIC0067]. Further work should be done to ensure the objectives align with the county councils wider corporate policies.	See response to Rep WLPIC0067 (Issue 3)
WLPIC0093	Watford Borough Council	4	No – Facilities do not drive waste management practices up the waste hierarchy, but behavioural changes do. What can be achieved at a facility, match the lower rungs of the hierarchy.	Agree minor re-wording of Objective 1 is required. Waste facilities do not drive waste management practices up the Waste Hierarchy; they facilitate/allow changes in consumer behaviour which drive waste management up the Waste Hierarchy. Objective 1 to be slightly amended to reflect this.
WLPIC0120	Three Rivers District Council	4	Yes -	Selection noted.
WLPIC0148	Stevenage Borough Council	4	No – See response to WLPIC0147. Welcome the Objectives sustainable approach to waste management.	Comment noted.
WLPIC0199	Welwyn Hatfield District Council	4	No – WH suggest they should include reference to the need to protect Green Belt.	It is not considered necessary to include mention of Green Belt in the Vision. Green Belt is incorporated within the term "natural, built and historic environments" and will be the subject of policy/ies which will be drafted and included in the Regulation 18 Draft Waste Local Plan.
WLPIC0231	Savills on behalf of	4	No –	Wastewater requirements are closely

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	Thames Water Utilities Ltd		As set out above it is considered that an objective regarding wastewater treatment should be included.	aligned to the proposals for residential development in district and borough Local Plans. Wastewater is a key infrastructural consideration in all the emerging Local Plans and as such, the need for additional facilities/capacity is being dealt with by the districts and boroughs with involvement of the relevant wastewater service provider. However, it is considered that the provision of additional wastewater facilities/capacity is incorporated in Objectives 2 and 3 as drafted in the WLPIC document.
WLPIC0245	Chiltern Society	4	No – See Comment to Issue 3	The Chilterns AONB will be mentioned in policy which will be drafted and included in the Regulation 18 Draft Waste Local Plan. The Chilterns Society will be consulted on policy wording as Plan production progresses.
WLPIC0259	Jane Orsborn Associates on behalf of Mr A Pinkerton of A F Pinkerton & Partners	4	- We suggest an additional objective:- Encourage greater recycling of green waste and its use as an organic fertiliser on agricultural land throughout the county to improve soil fertility and structure.	The emerging WLP will plan for increased levels of organic waste recycling. This is explained in more detail in the Draft Waste Capacity Gap Report (2017) and will be included in supporting text and policy within the emerging WLP.
WLPIC0290	Bell Cornwell (on behalf of Dundenes Limited)	4	Yes -	Selection noted.
WLPIC0300	David L Walker Ltd (on behalf of Tarmac)	4	No – There is no recognition or encouragement of the use of waste as a resource to provide a positive benefit. Objective 10 goes so far but does not way point the role that co-location can play in providing sustainable	Multiple references to the Waste Hierarchy are included to encourage the use of waste as a resource. Reuse is the second step of the Waste Hierarchy, after reduce. The provision of well-designed and

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			development. There is no reference to safeguarding of existing or planned waste management infrastructure. This is a key fact to strategic planning. Objective 7 also needs to recognise cross boundary and cross regulatory relationships (including the private sector).	efficient facilities is a focus of Objective 1. This incorporates safeguarding sites as existing sites are important for the future network of waste sites in Hertfordshire. Agree that Objective 7 could also refer to regional partners and/or integrated planning.
WLPIC0325	Transport for London	4	- TfL welcome Objective 5	Comment noted.
WLPIC0328	Iceni Projects (on behalf of BP Mitchell)	4	No – A clear Objective should be to allocate waste management sites to deal with increased waste arisings, particularly in respect of C, D & E waste and for further recycled aggregate facilities	If considered appropriate and feasible, the WLP will allocate sites to meet the capacity gap. The objectives of the emerging Plan do therefore not need to mention allocating sites. The Objectives focus on the provision of sites, which may be in allocated sites and/or areas of search.
WLPIC0356	HCC Ecology	4	Yes -	Selection noted.
WLPIC0383	Canal & River Trust	4	No – The vision and objective 2 should seek the use of sustainable transport links not simply their 'consideration'.	Agree that minor rewording could make this stronger. The term "use of sustainable transport where appropriate" could be used instead of "consideration".
WLPIC0385	Canal & River Trust	4	Yes – We support objective 5 (sustainable, low-emission modes of transport). We suggest that this should also apply to employees accessing sites, where this is consistent with other objectives	Sustainable, low-emission modes of transport for employees is incorporated into Objective 10 as a means of mitigating negative contributions towards climate change.
WLPIC0389	Biffa Waste Services	4	Yes – • Objective 3 seeks to encourage the location of waste facilities as close as possible to the origin of waste (the proximity principle). In our view, the aim of the proximity principle is to ensure that waste is managed at the nearest appropriate facility having	Comments noted. Agree that Objective 3 could be reworded to reflect the need to minimise transportation miles rather than transportation distances to waste management facilities.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			<p>regard to the waste type, not necessarily the nearest facility to where it arises. For example, hazardous waste is managed at specialist facilities such as our Stevenage site and travels over much further distances than construction and demolition wastes.</p> <ul style="list-style-type: none"> • We fully support Objective 5, particularly in relation to strategic energy recovery and landfill facilities. Landfill sites such as Westmill are becoming more specialised and wastes travel over longer distances for disposal. It is more economic to transport waste by rail rather than road over long distances 	
WLPIC0402	Aylesbury Vale District Council	4	<p>No – Suggest Objective 7 is changed to ‘co-operation both within and adjacent the county’ to reflect the Duty to Co-operate.</p>	Agree that Objective 7 could also refer to regional partners and/or integrated planning.
WLPIC0426	HCC Waste Management and Environmental Resource Planning	4	<p>No – The Vision as it stands requires buy-in from Members and Hertfordshire waste and planning authorities. If such an agreement was achieved, the aims and objectives should then be structured to enable the delivery of the joint ambition.</p>	The Vision, as with aspects of the emerging WLP, must be agreed by elected Members through HCC Cabinet Panel, Cabinet and County Council decision-making processes at all consultation stages of Plan production. All Hertfordshire's planning authorities and members of the Herts Waste Partnership have been, and will continue to be, consulted and their representations will be taken into account in further stages of Plan-production.
WLPIC0427	HCC Waste Management and Environmental Resource Planning	4	<p>No –</p> <ul style="list-style-type: none"> • Objective 3 – waste facilities should be located as close as practicable to the origin of waste but consideration should also be given to the output and likely effect on the environs for the particular technology being employed. For example, HWRCs 	<p>Comments noted.</p> <p>Agree that Objective 3 could be reworded to reflect the need to minimise total transportation miles rather than transportation distances to waste management facilities.</p>

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			<p>and/or Waste Transfer Stations may be appropriate close to developed areas whilst composting activities may be more appropriate closer to the customers for outputs such as agricultural settings.</p> <ul style="list-style-type: none"> • Objective 5 – whilst the promotion of rail and water as sustainable transport is sound, it needs to be tempered by the reality of delivery. Waste transport by rail and/or water, requires infrastructure at both ends of the transport network. This may necessitate a disproportionate number of waste movements that is necessary and could act contrary to WDA requirements for competitive, efficient and effective waste disposal. •Objective 9 – The proximity to significant waste-generating areas such as London could require significant export of Hertfordshire’s own LACW throughout the plan period. The plan should recognise sufficient needs for the LACW stream to enable the continued disposal of residents’ waste and, as a minimum, enable the delivery of infrastructure that will permit the effective movement of wastes out of the county should capacity not be available for the preferred in-county treatment of wastes, that is, a network of transfer stations. In this regard the needs of the WDA are appropriately articulated in the WDA’s October 2016 LACW Spatial Strategy and September 2017 Annex. <p>https://www.hertfordshire.gov.uk/media-library/documents/waste/spatial-strategy/hertfordshire-county-council-lacw-spatial-strategy-2016.pdf</p>	<p>Agree with comments on Objective 5 however, the WLP will aim to increase the use of rail/water transportation where appropriate. The mechanism for implementing this Objective would be a policy which would not object to development if rail/water transport could not be used.</p>

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			https://www.hertfordshire.gov.uk/media-library/documents/waste/spatial-strategy/hwrc-annex-to-the-lacw-spatial-strategy-2017.pdf	
WLPIC0450	Historic England	4	<ul style="list-style-type: none"> - • Support Objective 2. Wording could be improved, referring to the need for both conservation and enhancement of the historic environment where appropriate. • The WLP should adequately consider every element of the historic environment, particularly issues relating to individual designated heritage assets. • Individually designated heritage assets can be areas that are likely to be the more sensitive to waste management development. 	Comments noted. Agree the term 'protection' could be strengthened.
WLPIC0462	Essex County Council	4	<ul style="list-style-type: none"> Yes – • Objective 3 accords with the proximity principle and the memorandum of understanding (MoU) between the Waste Planning Authorities of the East of England signed on 19 April 2016 • The suite of Objectives are supported and are considered to be an effective, sustainable and policy compliant approach to delivering waste management across Hertfordshire. 	Comments noted.
WLPIC0486	HCC Natural Historic and Built Environment	4	<ul style="list-style-type: none"> - • Reference to the Natural, Historic and Built Environment is fully supported. • Opportunity to give more detail regarding key aspects that comprise the natural environment, such as landscape, nature conservation, and historic environment assets. • higher level objectives, in line with the NPPF, are 	Comments noted. Agree the term 'protection' could be strengthened.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			likely to be the conservation and enhancement of the County's distinct landscapes, protection of landscapes of value, and the protection, enhancement, creation and management of GI networks	
WLPIC0493	HCC Public Health	4	Yes – The draft objectives in our view are sufficient to support a later policy position on the requirement for Health Impact Assessment.	Comment noted.
WLPIC0501	Transition Town Letchworth	4	No – They cover the correct themes but need to have a higher aspiration	Comment noted.
WLPIC0548	Hertford Town Council	4	- • Hertford Town Council supports Objective 5 and 10	Comment noted.

Table 3: Plan Approach and Plan Length

General Statement covering Issues 5 & 6:

There was unanimous support for the production of a single document Plan, noting a single Plan document's advantage of improved clarity for decision makers and prospective applicants. The majority of consultees also provided backing for a Plan length of 15 years from the date of adoption. Comments were made that the Plan length should extend to 2036 to be in line with emerging District and Borough Local Plans. The date of adoption for the Waste Local Plan is currently envisaged for 2021. A 15 year Plan-period would extend to 2036.

It is therefore proposed that in line with stakeholder support, and national policy, a single Waste Local Plan document will be produced, which includes the strategy, policies and policies map, and covers a 15 year Plan-period.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
Issue 5				
Do you agree with the County Council's intention to prepare a single Waste Local Plan document?				
<ul style="list-style-type: none"> ○ Yes ○ No 				
WLPIC0005	Royston Council	5	Yes -	Selection noted.
WLPIC0052	Hampshire County Council	5	Yes -	Selection noted.
WLPIC0056	Chilterns Conservation Board	5	Yes -	Selection noted.
WLPIC0069	North Hertfordshire District Council	5	Yes -	Selection noted.
WLPIC0094	Watford Borough Council	5	Yes -	Selection noted.
WLPIC0121	Three Rivers District Council	5	Yes -	Selection noted.
WLPIC0149	Stevenage Borough Council	5	Yes - A single document is more concise and usable than	See General Statement

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			multiple documents.	
WLPIC0200	Welwyn Hatfield District Council	5	Yes – Supports single WLP complying with the NPPF.	Selection noted.
WLPIC0217	St Alban City and District Council	5	Yes - A single Waste Local Plan to replace the existing split of the Core Strategy and Allocations Plan, and in particular Supplementary Planning Documents (SPD), is supported.	See General Statement
WLPIC0232	Savills on behalf of Thames Water Utilities Ltd	5	Yes -	Selection noted.
WLPIC0235	Anglian Water Services Ltd	5	Yes -	Selection noted.
WLPIC0246	Chiltern Society	5	Yes -	Selection noted.
WLPIC0260	Jane Orsborn Associates on behalf of Mr A Pinkerton of A F Pinkerton & Partners	5	Yes -	Selection noted.
WLPIC0272	CEMEX UK	5	Yes - So long as there is adequate and effective monitoring in place and the Plan is sufficiently flexible to respond to changing circumstances.	See General Statement
WLPIC0291	Bell Cornwell (on behalf of Dundenes Limited)	5	Yes -	Selection noted.
WLPIC0301	David L Walker Ltd (on behalf of Tarmac)	5	Yes -	Selection noted.
WLPIC0329	Iceni Projects (on behalf of BP Mitchell)	5	Yes -	Selection noted.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
WLPIC0357	HCC Ecology	5	Yes -	Selection noted.
WLPIC0428	HCC Waste Management and Environmental Resource Planning	5	Yes -	Selection noted.
WLPIC0451	Historic England	5	Yes – This will help improve efficiency and clarity of meaning which will aid both decision makers and prospective applicants.	See General Statement
WLPIC0463	Essex County Council	5	Yes -	Selection noted.
WLPIC0502	Transition Town Letchworth	5	Yes -	Selection noted.
Issue 6 How long should the duration of the Waste Local Plan be? <ul style="list-style-type: none"> ○ 15 years ○ A longer time frame 				
WLPIC0006	Royston Council	6	15 Years – Technology changes rapidly and so a longer timeframe would not be acceptable.	See General Statement.
WLPIC0050	Hampshire County Council	6	15 Years -	Selection noted.
WLPIC0057	Chilterns Conservation Board	6	15 years -	Selection noted.
WLPIC0070	North Hertfordshire District Council	6	15 Years -	Selection noted.
WLPIC0095	Watford Borough Council	6	Longer – Watford is preparing Local Plans to 2036 not 2031	See General Statement.
WLPIC0122	Three Rivers District Council	6	15 Years – 15 years matches the timeframe of the emerging	See General Statement.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			district and borough Local Plans.	
WLPIC0150	Stevenage Borough Council	6	15 Years – With waste technology improving all the time, the 15 year period allows for a strategic approach without the limitations of a longer timeframe.	Comment noted.
WLPIC0185	Dacorum Borough Council	6	Longer – <ul style="list-style-type: none"> • The WLP should run to 2036. • Borough Council considers that the proposed time horizon of the Waste Local Plan is too short in relation to Government guidance. • Emerging new local plans in Hertfordshire are looking beyond 2031. • Scale of future growth in the Waste Local Plan, should reflect the Draft Revised NPPF which says local plans should plan to meet local housing need • The position on the likely scale of growth in Hertfordshire to 2036 should be clearer before the Draft Waste Local Plan is produced (due autumn 2019). 	See General Statement.
WLPIC0201	Welwyn Hatfield District Council	6	15 years – <ul style="list-style-type: none"> • Supports 15 year time frame. • Complies with timeframes of the Hertfordshire District Local Plans. • Regard should be had to the longer term in setting the strategy. 	See General Statement.
WLPIC0218	St Alban City and District Council	6	Longer – A longer plan period is desirable to align with the longer Plan Periods being used in District / Borough Local Plans.	See General Statement.
WLPIC0247	Chiltern Society	6	15 Years -	Selection noted
WLPIC0261	Jane Orsborn Associates on behalf of Mr A	6	15 years -	Selection noted

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
	Pinkerton of A F Pinkerton & Partners			
WLPIC0273	CEMEX UK	6	15 Years -	Selection noted
WLPIC0292	Bell Cornwell (on behalf of Dundenes Limited)	6	15 Years -	Selection noted
WLPIC0302	David L Walker Ltd (on behalf of Tarmac)	6	15 Years -	Selection noted
WLPIC0330	Iceni Projects (on behalf of BP Mitchell)	6	15 years – The WLP (and all supporting documents and relevant evidence base) should be reviewed no less than every 5 years to respond to changes which may affect effective waste management,	Comment noted. National guidance (and the adopted Plan) states that Plans should be reviewed every 5 years.
WLPIC0358	HCC Ecology	6	15 Years -	Selection noted
WLPIC0429	HCC Waste Management and Environmental Resource Planning	6	Longer – Flexibility within a longer term Plan, could be promoted by acknowledging that Areas of Search for WDA needs will be updated (in subsequent versions of the HCC LACW Spatial Strategy) to better reflect emerging pressures as growth areas come on line and legislative requirements and facilities change.	Comment noted. The Plan would be monitored on an annual basis.
WLPIC0464	Essex County Council	6	15 Years – As no information is presented to justify a longer period, and given the fact that Local Plans are to be reviewed every five years to ensure their appropriateness, 15 years is appropriate.	See General Statement.
WLPIC0503	Transition Town Letchworth	6	15 Years – To allow flexibility, no investment should commit the council to a particular technology for longer than 15 years.	See General Statement.

Table 4: Waste Data and Capacity Gap

General Statement covering Issues 7 17:

Due to the quantity and variety of Issues within the Waste Data & Capacity Gap chapter, General Statements are included for individual Issues throughout Table 4 rather than a single overarching General Statement for the chapter.

The Draft Waste Capacity Report (2017) will be updated to take account of responses to the Initial Consultation and updated data sources. This will identify capacity gaps for specific types of waste management and will be a key part of the evidence base supporting the emerging WLP.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
Issue 7				
Do you agree with the county council's intention to use figures from the HCC Local Authority Collected Waste Spatial Strategy to predict the future quantity of waste generated by households in the county?				
<ul style="list-style-type: none"> ○ Yes ○ No 				
General Statement				
The use of the HCC Local Authority Collected Waste Spatial Strategy received almost unanimous support and it will be used to help establish the LACW portion of non-hazardous waste arisings in the emerging WLP's Waste Capacity Gap study.				
WLPIC0007	Royston Council	7	Yes – It is the most reliable source that we have.	See General Statement.
WLPIC0008	Royston Council	7	Yes – It is the most reliable source that we have.	See General Statement.
WLPIC0051	Hampshire County Council	7	- It would be useful to know when the pilot scheme started and hence when WDF data could not be used for this purpose.	There are gaps in some waste data flow reports between 2014 and 2016, including for a few reports for East of England authorities.
WLPIC0071	North Hertfordshire District Council	7	Yes -	Selection noted.
WLPIC0096	Watford Borough	7	Yes –	The "three main types" mentioned in

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
	Council		Confusion over wording in paragraph 8.5 and 3 different waste types. Supports inclusion of a glossary.	WLPIC para 8.5 are commonly used when planning for waste and are considered the appropriate catch-all waste streams to use in the emerging WLP. Agree that including definitions in a glossary would be beneficial.
WLPIC0123	Three Rivers District Council	7	Yes -	Selection noted.
WLPIC0151	Stevenage Borough Council	7	Yes -	Selection noted.
WLPIC0186	Dacorum Borough Council	7	Yes -	Selection noted.
WLPIC0202	Welwyn Hatfield District Council	7	<p>No –</p> <ul style="list-style-type: none"> • LACW Spatial Strategy (2016) should be updated to reflect the most up-to date proposals for housing growth included in the Hertfordshire Local Plans – not the Objectively Assessed Housing Needs. • LACW Strategy has not set out the assumptions used to project future LACW produced, thus failing to clarify why it is expecting the level of LACW to increase by 2031. • In line with the PPG, the LACW Spatial Strategy should set out a growth profile of waste, the assumed rate that it is produced for the projections, based upon household/population growth and waste per household/per capita. 	<p>The LACW Spatial Strategy is a 'live' document updated by the Waste Disposal Authority (WDA) when undertaking a review of the operational management of waste collected by the Waste Collection and Waste Disposal Authorities. The WDA does not intend to make updates to the Spatial Strategy in the near future. The existing document is currently considered by the WDA to be the best overview of the needs for management of Local Authority Collected Waste.</p> <p>Whilst the LACW Strategy does not set out all the assumptions used to project future waste arisings, an overview of the assumptions were provided to the WPA and are set out in paragraph 8.16 of the WLPIC.</p>
WLPIC0331	Iceni Projects (on behalf of BP Mitchell)	7	Yes -	Selection noted.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
WLPIC0359	HCC Ecology	7	Yes -	Selection noted.
WLPIC0411	Veolia Environmental Services	7	Yes -	Selection noted.
WLPIC0430	HCC Waste Management and Environmental Resource Planning	7	Yes – Whilst the LACW Spatial Strategy is the best indicator of volumes to be managed, increased housing numbers in emerging district Plans should be monitored to inform thinking throughout development of the Waste Local Plan.	The levels of housing being planned for in emerging district and borough Local Plans will continue to be monitored as part of our ongoing Duty to Cooperate commitments as stated in the HCC Duty to Cooperate Protocol.
WLPIC0465	Essex County Council	7	Yes -	Selection noted.
WLPIC0504	Transition Town Letchworth	7	No – More ambitious targets should be used. The compositional analysis of May 2015 should be projected forwards to take account of ambitious targets for reduction, redesign, re-use, recycling and composting and energy production via suitable forms of Mechanical Biological Treatment. Growth trends should be include ambitions for reduce and reuse and waste volumes should be decoupled from growth.	The LACW Spatial Strategy takes account of recorded recycling performance levels, nationally and internationally set targets, and an understanding of the potential changes to waste collection services by partners of the Hertfordshire Waste Partnership. The LACW projections are considered the most reliable forecast of LACW waste arisings and it is not considered that sufficient justification exists to plan for land-use over and above the targets included in the LACW Spatial Strategy.

Issue 8

Which recycling and composting scenario do you think is the most appropriate for the Capacity Gap Report to use to forecast the future quantity of waste generated by households in the county?

- 65%
- 60%
- Another scenario

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
General Statement				
The majority of consultees considered it appropriate for the WLP to plan for Hertfordshire to achieve a 65% recycling & composting target for LACW by 2031. This was the most aspirational scenario presented in the HCC LACW Spatial Strategy.				
WLPIC0010	Royston Council	8	65% - We would prefer a more ambitious target.	The purpose of WLP is to plan for the land-use requirements for the expected levels of waste generated in the future. The targets and projections included in the LACW Spatial Strategy take account of recorded recycling performance levels, nationally and internationally set targets, and an understanding of the potential changes to waste collection services by partners of the Hertfordshire Waste Partnership. The LACW projections are considered the most reliable forecast of LACW waste arisings and it is not considered that sufficient justification exists to plan for land-use over and above the targets included in the LACW Spatial Strategy.
WLPIC0072	North Hertfordshire District Council	8	65% -	Selection noted.
WLPIC0097	Watford Borough Council	8	65% - <ul style="list-style-type: none"> • The first sentence of paragraph 8.14 seems unnecessary. • The population growth figures should be kept under review 	Comment noted. The LACW Spatial Strategy is a 'live' document updated by the Waste Disposal Authority (WDA) when undertaking a review of the operational management of waste collected by the Waste Collection and Waste Disposal Authorities. At the current time, the WDA does not intend to make any updates to the Spatial Strategy.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
				The existing document is currently considered by the WDA to be the best overview of the needs for management of Local Authority Collected Waste.
WLPIC0124	Three Rivers District Council	8	- No preference over either scenario.	Comment noted.
WLPIC0152	Stevenage Borough Council	8	65% -	Selection noted.
WLPIC0187	Dacorum Borough Council	8	65% -	Selection noted.
WLPIC0203	Welwyn Hatfield District Council	8	65% - • Support 65% scenario. • This will help move waste up the hierarchy and promote sustainable development.	Comment noted.
WLPIC0262	Jane Orsborn Associates on behalf of Mr A Pinkerton of A F Pinkerton & Partners	8	Alternative Scenario – As stated in response to Issue 3 we consider the target should be higher for green waste than either 60% or 65%	The purpose of WLP is to plan for the land-use requirements for the expected levels of waste generated in the future. The projections for organic waste included in the LACW Spatial Strategy take account of recorded recycling performance levels, nationally and internationally set targets, and an understanding of the potential changes to waste collection services by partners of the Hertfordshire Waste Partnership. The LACW projections are considered the most reliable forecast of LACW waste arisings and it is not considered that sufficient justification exists to plan for land-use over and above the targets included in the LACW Spatial Strategy.
WLPIC0332	Iceni Projects (on behalf of BP	8	65% -	Selection noted.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
	Mitchell)			
WLPIC0360	HCC Ecology	8	60% - Without access to data or interpretation it is not possible to provide a view on this, but given the extent of waste generation, a more conservative estimate may be more realistic.	Selection noted. The Draft Waste Capacity Gap published alongside, and referenced in chapter 8 of, the WLP Initial Consultation document sought to provide an overview of the data and sources being considered. This document will be updated throughout Plan-production.
WLPIC0410	Northamptonshire County Council	8	- • Local Authority Collected Waste – The extent to which existing municipal contracts have been taken into account regarding future targets should be clarified. • Accounting for transfer/ intermediate capacity – the extent to which intermediate facilities capacity is taken into account should be clarified.	Agree that municipal waste contracts and the use of intermediate facilities should be clearly shown. These will be clearly shown and taken into account in updated versions of the Waste Capacity Gap report and in support of the WLP production.
WLPIC0412	Veolia Environmental Services	8	Alternative Scenario – • Recycling and composting rates achieving improved rates of 60% or 65% may not be easily achieved. The LACWSS acknowledges that the percentage of residual waste has plateaued and that policy changes may be required for rates to improve beyond 50%. • For robustness the LP should therefore plan on the basis of a range of scenarios.	Waste targets may be difficult to achieve and may require changes to national / local policies. However, targets are designed to be aspirational and the HCC LACW Spatial Strategy justifies the inclusion of the target to achieve 60% and 65% recycling rates. The selection of a high growth scenario for the WLP is considered the most flexible approach for the WLP to take as it will help to meet these targets and will not stifle development of the waste industry.
WLPIC0432	HCC Waste Management and Environmental Resource Planning	8	Alternative Scenario – • Recycling levels are best aligned to legislative commitments; however, there has been considerable uncertainty surrounding the future direction of waste	The projections included in the LACW Spatial Strategy take account of recorded recycling performance levels, nationally and internationally set targets, and an

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			<p>management policy in the UK which may be unclear.</p> <ul style="list-style-type: none"> •Defra is reported to have confirmed that it has written to inform the European Parliament the UK will vote in favour of the Circular Economy Package when it comes to the European Council. Should transposition of the provisional CEP agreement occur, this would set municipal waste recycling targets of 55 per cent by 2025, 60 per cent by 2030, and 65 per cent by 2035. •In addition, the government has recently published its 25 year Environment Plan, but has yet to produce its Resources and Waste Strategy which should outline how the Plan's ambitions will come to fruition. 	<p>understanding of the potential changes to waste collection services by partners of the Hertfordshire Waste Partnership. Changes to UK legislation can be taken into account during the production of the emerging WLP (and may necessitate changes being made to the LACW Spatial Strategy). However, the LACW Spatial Strategy projections are currently considered the most reliable forecast of LACW waste arisings.</p>
WLPIC0466	Essex County Council	8	<p>Alternative Scenario –</p> <ul style="list-style-type: none"> • Recycling rates should be based on previous recycling trends. Targets should take into account the need to increase on past performance. The setting of a target of 65% rolled over from the previous WLP may be appropriate but will need to be justified and also monitored to ensure that the Plan makes appropriate provision in land use terms in the first instance and can also respond to a change of requirements. •The EU target of recycling 50% of household waste by 2020 is noted, as is the fact that the UK is not yet meeting this target. It is further noted that the EU Circular Economy Package sets proposed targets of 65% of municipal waste to be recycled and a maximum of 10% to be landfilled by 2030. 	<p>Historical recycling trends are included in the HCC LACW Spatial Strategy and are taken into account in the forecasts of annual waste generation.</p>
WLPIC0505	Transition Town Letchworth	8	<p>Alternative Scenario –</p> <p>Neither 60% nor 65% will deliver 'every penny counts'. Seven authorities in the UK already recycle over 60% and Germany recycles 66% so these</p>	<p>The purpose of WLP is to plan for the land-use requirements for the expected levels of waste generated in the future. The targets/projections included in the</p>

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			targets are not unambitious. Hertfordshire should target through 70% to 90% if it seeks to be near zero waste.	LACW Spatial Strategy take account of recorded recycling performance levels, nationally and internationally set targets, and an understanding of the potential changes to waste collection services by partners of the Hertfordshire Waste Partnership. The LACW targets are considered the most reliable forecast of LACW waste arisings and it is not considered that sufficient justification exists to plan for land-use over and above the targets included in the LACW Spatial Strategy.
<p>Issue 9 Do you agree with the county council's intention to use figures from the Waste Data Interrogator to establish the quantity of waste generated by businesses and industry in the county?</p> <ul style="list-style-type: none"> ○ Yes, ○ No <p>General Statement The majority of consultees agreed that the Waste Data Interrogator was the most appropriate source of data to establish Commercial and Industrial waste arisings. However, it was advised that the WDI was supplemented with additional sources of data for operational sites which don't operate under the Waste Management Licence Regulations. To take account of this, the emerging WLP's Waste Capacity Gap study will seek to incorporate material processed at waste sites operating under the Pollution Prevention and Control regulations as well as sites on the Environment Agency's list of permitted sites when establishing Commercial and Industrial waste arisings</p>				
WLPIC0009	Royston Council	9	Yes -	Selection noted.
WLPIC0073	North Hertfordshire District Council	9	Yes -	Selection noted.
WLPIC0098	Watford Borough Council	9	Yes -	Selection noted.
WLPIC0125	Three Rivers District Council	9	Yes -	Selection noted.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
WLPIC0153	Stevenage Borough Council	9	Yes -	Selection noted.
WLPIC0204	Welwyn Hatfield District Council	9	Yes – <ul style="list-style-type: none"> • Appropriate to use WDI • Caution should be exercised as WDI has the potential of overestimating the volume of C & I waste produced. • Hertfordshire should work with other waste authorities to lobby government for a more rigorous approach to monitoring waste from both this sector and construction demolition and waste 	Comments noted.
WLPIC0333	Iceni Projects (on behalf of BP Mitchell)	9	Yes -	Selection noted.
WLPIC0361	HCC Ecology	9	Yes -	Selection noted.
WLPIC0413	Veolia Environmental Services	9	Yes -	Selection noted.
WLPIC0431	HCC Waste Management and Environmental Resource Planning	9	Yes -	Selection noted.
WLPIC0439	Environment Agency	9	No – <ul style="list-style-type: none"> • The WDI primarily covers sites regulated under Waste Management Licensing regulations (WML). It should be complemented with sites regulated under Pollution Prevention and Control regulations (PPC) such as large Energy from Waste facilities - this data is available from the EA and Defra on the data.gov.uk website. • In addition, some facilities are omitted from WDI and the PPC datasets (such as large material recovery facilities) - this data is available on the Env permitting 	See General Statement.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			list available on the data.gov.uk website. • A cross reference between these three datasets should be made and may account for the difference between overall WDI and Defra figures.	
WLPIC0446	Environment Agency	9	No – The WDI does not contain information about facilities regulated by PPC regulations.	See General Statement.
WLPIC0467	Essex County Council	9	Yes -	Selection noted.
WLPIC0506	Transition Town Letchworth	9	No – It has been shown that residual plastics have been underestimated by roughly 30% casting doubt on the way WDI figures are derived. A snapshot approach accounting for production and imports - exports should be used.	The proposal to use the WDI is to establish a future quantity of commercial and industrial waste 'production'. There is no obligation for businesses to record the quantity of waste they produce and it would therefore be impossible to create an accurate 'snapshot' of waste produced + imports - exports for the waste stream. The WPA does undertake its own annual waste survey of all operators within the county; however, as operators are under no statutory obligation to respond, response rates are low compared to the returns for the EA's responses which populate the WDI database.
<p>Issue 10 Which growth scenario do you think is the most appropriate for the Capacity Gap Report to use to forecast the future quantity of waste generated by businesses and industry in the county?</p> <ul style="list-style-type: none"> ○ Low Growth – the EEFM forecasts of employment levels for individual sectors ○ High Growth – the EEFM forecast of Gross Value Added ○ Another scenario <p>General Statement</p>				

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
<p>There was no consensus on the most appropriate scenario of future growth for the Commercial and Industrial portion of the non-hazardous waste stream, although the high growth scenario was selected by most consultees.</p> <p>A number of consultees suggested that a range of future scenarios should be included in the WLP to provide flexibility. The emerging WLP should aim to provide certainty with regards to future development and the WPA does therefore not consider it appropriate to provide a range of growth options within the emerging WLP. The WPA proposes to use the High Growth scenario as it was the most selected option and is considered the most flexible approach for the WLP. It will not stifle innovation or the development of the waste industry based on potentially misleading short-term low growth trends, and it will not leave the Plan at risk of the requirement for an early review if waste production increases quickly alongside forecast population and economic growth.</p>				
WLPIC0011	Royston Council	10	Low – It should be monitored closely and changes made where necessary	Quantities of waste management for different waste streams are monitored on an annual basis by several reporting mechanisms. This allows the County Council to monitor changes which might require amendments to be made to the land-use requirements for future waste management.
WLPIC0074	North Hertfordshire District Council	10	High – NHDC's employment strategy in the Local Plan are based off the EEFM baseline scenario, as it is not clear whether the baseline study equates to high or low growth it is considered prudent to plan for higher growth.	See General Statement.
WLPIC0099	Watford Borough Council	10	High –	Selection noted.
WLPIC0126	Three Rivers District Council	10	Low –	Selection noted.
WLPIC0154	Stevenage Borough Council	10	High – A non-technical version of the Capacity Gap Report would help provide understanding of which level of growth should be used.	Selection noted. A Non-Technical Summary will be produced in support of finalised versions of the Waste Capacity Gap Report.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
WLPIC0188	Dacorum Borough Council	10	<p>Alternative Scenario –</p> <ul style="list-style-type: none"> • The Waste Local Plan will be more robust if employment evidence base studies and emerging new local plans in Hertfordshire are also taken into account. • The South West Hertfordshire Economic Study (February 2016) includes guidance on future job growth in different sectors for each of the South West Hertfordshire authorities (Dacorum, Hertsmere, St Albans, Three Rivers and Watford). • This study will inform the South West Hertfordshire Joint Strategic Plan. It is expected that the economic study will be updated and the emerging strategic local plan published before the Draft Waste Local Plan is produced. 	<p>Selection noted.</p> <p>There are a number of reasons for not basing C&I waste arising projections on employment land being planned for in District and Borough Local Plans. Firstly, the District and Borough Local Plans are at different stages of Plan production and the evidence used to support the allocation of employment land in Local Plans is inconsistent between the LPAs. Secondly, the methodology proposed in the Waste Capacity Gap Report uses a greater selection of sectors than are used in the District and Borough employment studies. In combination with the Defra Waste Study (2009), this allows the WPA to gain a breakdown of the sources of waste by sector. This is considered more robust than if the overarching employment types were used, as is the case in most of the District and Borough employment studies. This gives greater confidence in the future projections when extrapolated across the Plan period. Thirdly, there is no certainty if or exactly when proposed development will come forward. This approach is agreed with the East of England Waste Technical Advisory Body.</p>
WLPIC0205	Welwyn Hatfield District Council	10	<p>Low –</p> <ul style="list-style-type: none"> • Supports low growth scenario. • WHDC recommends that the use of a single East of England Forecasting Modelling (EEFM) projections should be treated with caution - vary considerably 	<p>Selection noted. Comment regarding the reliability of EEFM data noted. Annual variations of sector will be sense-checked as part of the methodology.</p> <p>There are a number of reasons for not</p>

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			<p>from one run to another and that it would be appropriate to look at an average for a 10 year period.</p> <ul style="list-style-type: none"> • Should consider the employment strategies of respective Local Plan and the extent to which they are proposing to meet EEFM forecasts. 	<p>basing C&I waste arising projections on employment land being planned for in District and Borough Local Plans. Firstly, the District and Borough Local Plans are at different stages of Plan production and the evidence used to support the allocation of employment land in Local Plans is inconsistent between the LPAs. Secondly, the methodology proposed in the Waste Capacity Gap Report uses a greater selection of sectors than are used in the District and Borough employment studies. In combination with the Defra Waste Study (2009), this allows the WPA to gain a breakdown of the sources of waste by sector. This is considered more robust than if the overarching employment types were used, as is the case in most of the District and Borough employment studies. This gives greater confidence in the future projections when extrapolated across the Plan period. Thirdly, there is no certainty if or exactly when proposed development will come forward. This approach is agreed with the East of England Waste Technical Advisory Body.</p>
WLPIC0219	St Alban City and District Council	10	<p>Low –</p> <ul style="list-style-type: none"> • Forecasts should be based on lowest reasonably justifiable level of growth. 	See General Statement.
WLPIC0334	Iceni Projects (on behalf of BP Mitchell)	10	High -	Selection noted.
WLPIC0362	HCC Ecology	10	High –	The use of the EEFM is an approach

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			Employment levels may not reflect waste generation itself?	agreed by the East of England Waste Technical Advisory Body as the most appropriate indicator available to guide Commercial and Industrial waste arisings forecasts.
WLPIC0414	Veolia Environmental Services	10	Alternative Scenario – The LP should use a range of forecasts to ensure robustness and adequate future provision.	See General Statement. Levels of waste production will be monitored where possible in the HCC Authority's Monitoring Report and if the assumptions of the WLP for planned non-waste development and growth are observed to be significantly incorrect, a review of the WLP may be triggered.
WLPIC0468	Essex County Council	10	High – <ul style="list-style-type: none"> • The growth agenda promoted by the Government and resultant changes to the planning system to facilitate that growth make it seem appropriate to plan on the basis of High Growth scenarios. This is particularly true given the fact that extrapolating data from past performance would mean taking data from recessionary years. • An alternative option that could be explored is a blended scenario of the low and high scenarios if it is considered that economic growth can be de-coupled from waste production. However, a precautionary, high growth, approach may be the most justifiable, to prevent the emerging WLP falling victim to the requirement of an early review to include additional capacity/sites due to under-provision at the initial plan making stage. 	See General Statement.
WLPIC0507	Transition Town Letchworth	10	Alternative Scenario – Waste should be decoupled from growth so we should plan for existing or lower levels of waste	There is little evidence to show that waste generation has been decoupled from growth. Recycling levels matching those in

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			production as has been achieved in Germany.	Germany would require stringently applied legislation changes in this country which are not currently being proposed.
<p>Issue 11 Do you agree with the county council's intention to use a target to recycle and compost 60% of waste generated by businesses and industry by 2031?</p> <ul style="list-style-type: none"> ○ Yes ○ No <p>General Statement</p> <p>The majority of consultees considered it most appropriate for the WLP to plan for Hertfordshire to achieve a 60% recycling & composting target for commercial and industrial waste by 2031. This target aligns with the most aspirational scenario for LACW waste presented in the HCC LACW Spatial Strategy whilst acknowledging that Commercial and Industrial waste management levels are not expected to match the levels of LACW waste management due to the less stringent legal obligations to sort/separate waste at source.</p>				
WLPIC0012	Royston Council	11	Yes – Businesses and supermarkets should be educated on reducing packaging. We would prefer a higher target.	The WPA intends to carry Policy 2 over from the adopted WLP into the emerging WLP. Policy 2 encourages residents and business to reduce waste generation.
WLPIC0075	North Hertfordshire District Council	11	Yes -	Selection noted.
WLPIC0100	Watford Borough Council	11	No – 65% recycling rate for domestic waste should also be applied to commercial waste.	See General Statement
WLPIC0127	Three Rivers District Council	11	Yes – Target should be set for reduction and re-use as well as recycling.	The WLP does not set targets - it uses targets that are considered appropriate to forecast the quantity of future waste production so that waste management land-use requirements can be quantified and planned for. In addition, although the adopted and emerging WLPs do

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
				encourage waste reduction and reuse, reduction and reuse are primarily achieved through behavioural changes rather than changes to land-use. It would be impossible to isolate the improvements caused by the WLP (a land-use based document) so policy would be unmeasurable and unenforceable.
WLPIC0155	Stevenage Borough Council	11	Yes – Stevenage BC would support a higher figure if HCC felt this was appropriate.	See General Statement.
WLPIC0206	Welwyn Hatfield District Council	11	Yes -	Selection noted.
WLPIC0263	Jane Orsborn Associates on behalf of Mr A Pinkerton of A F Pinkerton & Partners	11	No – It should be more ambitious.	The purpose of WLP is to plan for the land-use requirements for the expected levels of waste generated in the future. It is not considered that sufficient justification exists to plan for performance levels of Commercial and Industrial waste management at the same level as LACW management or higher. As the LACW Spatial Strategy is considered the most reliable forecast of LACW waste arisings, it is considered that future Commercial and Industrial recycling and composting levels will not be higher than 60% by 2031.
WLPIC0335	Iceni Projects (on behalf of BP Mitchell)	11	Yes -	Selection noted.
WLPIC0363	HCC Ecology	11	Yes -	Selection noted.
WLPIC0415	Veolia Environmental Services	11	No – Increased recycling rates may be difficult to achieve without further policy / legal requirements on waste	See General Statement. Whilst it is acknowledged that amended Government agendas may be required to

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			producers. The LP should Plan for a range of future alternative recycling/composting rates, including continuation of current recycling rates.	meet aspirational targets, it is expected that Government and local authorities will try to increase recycling levels to achieve targets set by European and National targets during the WLP Plan period.
WLPIC0469	Essex County Council	11	Yes – Recycling targets should be realistic but also challenging in order to actively promote the waste hierarchy. Previous data collected by HCC will establish an appropriate recycling target for the plan period.	See General Statement.
WLPIC0508	Transition Town Letchworth	11	No – This target should exceed household recycling targets. The compositions of commercial and industrial waste streams are better separated at source. If waste is processed close to large business sites, it will avoid mixing and compaction that can occur in bulk haulage.	Waste studies show that household recycling levels have historically outperformed business recycling levels. Whilst commercial waste may be easier to separate at source (when waste streams are commonly materials such as paper, card, plastics generated by office work), industrial waste incorporates a much wider variety of materials processed by a very wide range of operations which make it more difficult to separate and store in individual waste streams at source.

Issue 12

Do you agree with the county council's intention to use figures from the Waste Data Interrogator to establish the quantity of waste generated by construction, demolition and excavation activity in the county?

- Yes
- No

General Statement

All except one consultee agreed that the Waste Data Interrogator was the most appropriate source of data to establish Construction, Demolition and Excavation waste arisings.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
WLPIC0013	Royston Council	12	Yes -	Selection noted.
WLPIC0076	North Hertfordshire District Council	12	Yes -	Selection noted.
WLPIC0101	Watford Borough Council	12	Yes -	Selection noted.
WLPIC0128	Three Rivers District Council	12	Yes -	Selection noted.
WLPIC0156	Stevenage Borough Council	12	Yes -	Selection noted.
WLPIC0274	CEMEX UK	12	Yes – However, some provision should be made in the baseline figure to account for waste managed at exempt sites.	Selection noted. It is considered that recent regulation changes ensure that fewer sites managing construction, demolition and excavation waste operate under exemptions. In addition, sites which do operate under exemptions are more likely to be managing waste from adjoining sites/developments so the material does not reach the waste market and does not require additional facilities for its management.
WLPIC0303	David L Walker Ltd (on behalf of Tarmac)	12	Yes -	Selection noted.
WLPIC0336	Iceni Projects (on behalf of BP Mitchell)	12	Yes -	Selection noted.
WLPIC0364	HCC Ecology	12	Yes -	Selection noted.
WLPIC0441	Environment Agency	12	Yes – Fewer sites now use an exemption when applying waste to land due to recent regulatory regime changes. However, this may have resulted in an apparent increase in overall waste arisings. Sites	Comment noted. It is considered that recent regulation changes ensure that fewer sites managing construction, demolition and excavation waste operate under exemptions. In addition, sites which

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			managing a large quantity of materials will now be regulated under waste management licences or the landfill regulations so overall WDI data should improve in the data.	do operate under exemptions are more likely to be managing waste from adjoining sites/developments so the material does not reach the waste market and does not require additional facilities for its management.
WLPIC0470	Essex County Council	12	Yes -	Selection noted.
WLPIC0509	Transition Town Letchworth	12	No – WDI is unreliable because data is partly gathered and partly guessed. A sampling study should be undertaken to gain firm data. If data is weak, the WLP should commit to gaining better data.	The WPA is not the authority responsible for the collection of waste management data. The Environment Agency undertakes this role and creates what is considered to be the most complete database. The WPA does undertake its own annual waste survey of all operators within the county; however, as operators are under no statutory obligation to respond, response rates are low compared to the returns for the EA's responses which populate the WDI database.
<p>Issue 13 Which growth scenario do you think is the most appropriate for the Capacity Gap Report to use to forecast the future quantity of waste generated by construction, demolition and excavation activity in the county?</p> <ul style="list-style-type: none"> ○ Low Growth – maintain the 2015 arising figure ○ High Growth – the EEFM forecast of GVA ○ Another scenario <p>General Statement</p> <p>A high growth scenario was the most selected option with the acknowledgement that growth proposed in the District and Borough Local Plans will lead to a continued increase in Construction, Demolition and Excavation waste production.</p>				

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
WLPIC0014	Royston Council	13	Low -	Selection noted.
WLPIC0077	North Hertfordshire District Council	13	High – Based upon past trends it is considered reasonable to assume acceleration in construction waste.	See General Statement.
WLPIC0102	Watford Borough Council	13	High -	Selection noted.
WLPIC0129	Three Rivers District Council	13	Low -	Selection noted.
WLPIC0157	Stevenage Borough Council	13	High -	Selection noted.
WLPIC0189	Dacorum Borough Council	13	Alternative Scenario – <ul style="list-style-type: none"> • Do not regard Option A as appropriate as construction activity in Hertfordshire is likely to increase significantly. • Option B involves the use of EEFM forecast of GVA, this seems unlikely to be a good proxy to use for forecasting the future quantity of waste generated by construction, demolition and excavation activity. • That a better approach would be to base the forecasts on the number of homes and jobs proposed in the emerging local plans in Hertfordshire. For South West Hertfordshire, the emerging Joint Strategic Plan is expected to contain such guidance before the Draft Waste Local Plan is produced. 	See General Statement. There is a lack of certainty regarding whether and/or when proposed developments will come forward. It is also difficult to state with certainty how much waste will be produced per development due to the variety of construction practises and economies of scale of development.
WLPIC0207	Welwyn Hatfield District Council	13	Alternative Scenario – <ul style="list-style-type: none"> • Welwyn Hatfield Council anticipates that the level of CDE waste will increase due to the significant level of housing growth and regeneration propose in Hertfordshire Authorities’ Local Plans. • Consider a different method of high growth should be used. 	See General Statement.
WLPIC0220	St Alban City and District Council	13	Low – Forecasts should be based on lowest reasonably	The selection of the high growth scenario is considered the most flexible approach

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			justifiable level of growth.	for the WLP to take as it does not stifle innovation or the development of the waste industry based on short term low growth trends when the overall trend of waste production is to increase alongside population and economy growth in Hertfordshire.
WLPIC0275	CEMEX UK	13	- It would seem realistic to assume an increase in construction as the economy grows, a scenario somewhere between these might be appropriate, but the Plan should be sufficiently flexible	The selection of the high growth scenario is considered the most flexible approach for the WLP to take as it does not stifle innovation or the development of the waste industry based on short term low growth trends when the overall trend of waste production is to increase alongside population and economy growth in Hertfordshire.
WLPIC0304	David L Walker Ltd (on behalf of Tarmac)	13	High -	Selection noted.
WLPIC0337	Iceni Projects (on behalf of BP Mitchell)	13	High -	Selection noted.
WLPIC0365	HCC Ecology	13	High -	Selection noted.
WLPIC0444	Environment Agency	13	Alternative Scenario – Tonnes received may be impacted by the delivery of major infrastructure projects in London such as Cross Rail 2 and the HS2 project. The EoE already receives excavated materials from the Thames Tideway tunnel project and has received material from the Lea Valley tunnel and Cross Rail in the recent past. Reference could be made to the tonnages and timescales included in the evidence base for the draft London Plan as a means of	It is agreed that forecasts may not fully take into account the impact of individual large infrastructure projects in London which, due to Hertfordshire's proximate location to the capital, export a significant amount of waste into the county. Whilst the Draft Capacity Gap Report (2017) shows historic imports and exports, illustrating the significant tonnages exported from London to Hertfordshire,

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			projecting the quantity to be received by the EoE.	<p>these waste movements are not explicitly included in capacity gap calculations. The emerging HCC WLP will be based on net self-sufficiency. This means it will plan for Hertfordshire to provide sufficient opportunities for waste development to manage the equivalent quantity of waste produced in Hertfordshire. However, whilst the tonnages produced in London are not incorporated into the calculation of waste arising tonnages for the emerging WLP, London's waste is considered through the statutory Duty to Cooperate which ensures that communication between the relevant waste planning authorities is maintained and that waste movements are constantly monitored to ensure that its management can continue.</p> <p>It is considered that using a high growth scenario for this waste stream adds necessary flexibility into the emerging WLP by ensuring that Hertfordshire won't need an early review of the WLP as soon as a large infrastructure project commences leaving the county with insufficient facilities. In addition, where a specific waste need is identified, such as for a temporary, infrastructure project which is expected to generate significant quantities of waste outside of the waste arisings being planned for by the more general findings of the Waste Capacity Gap evidence, an argument for need can</p>

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
				be taken into account through the planning application process.
WLPIC0471	Essex County Council	13	High – <ul style="list-style-type: none"> • The growth agenda promoted by the Government and resultant changes to the planning system to facilitate that growth make it seem appropriate to plan on the basis of High Growth scenarios. This is particularly true given the fact that extrapolating data from past performance would mean taking data from recessionary years. • An alternative option that could be explored is a blended scenario of the low and high scenarios if it is considered that economic growth can be de-coupled from waste production. However, a precautionary, high growth, approach may be the most justifiable, to prevent the emerging WLP falling victim to the requirement of an early review to include additional capacity/sites due to under-provision at the initial plan making stage." 	Comments noted. The selection of the high growth scenario is considered the most flexible approach for the WLP to take as it does not stifle innovation or the development of the waste industry based on potential short term low growth trends when the overall trend of waste production is to increase alongside population and economy growth in Hertfordshire.
WLPIC0510	Transition Town Letchworth	13	Low – Low growth aligns with decoupling waste from growth	Comment noted.
<p>Issue 14 Do you agree with the county council's intention to use a target to recover 70% of waste generated by construction, demolition and excavation activity by 202 and divert 90% of waste generated by construction, demolition and excavation activity from landfill by 2031?</p> <p style="padding-left: 40px;"> <input type="radio"/> Yes <input type="radio"/> No </p> <p>General Statement The majority of consultees considered the identified targets for C, D & E waste management to be appropriate for the emerging WLP to base future waste management requirements on.</p>				

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
WLPIC0015	Royston Council	14	Yes -	Selection noted.
WLPIC0078	North Hertfordshire District Council	14	Yes – Whilst these are good target values, the WPA should be mindful of potential significant uplift in waste from these sources as new local plans are implemented.	See General Statement. Levels of housing provision will be monitored in the HCC Authority's Monitoring Report.
WLPIC0103	Watford Borough Council	14	Yes -	Selection noted.
WLPIC0130	Three Rivers District Council	14	Yes -	Selection noted.
WLPIC0158	Stevenage Borough Council	14	Yes -	Selection noted.
WLPIC0208	Welwyn Hatfield District Council	14	Yes -	Selection noted.
WLPIC0276	CEMEX UK	14	- The longer-term target - this should be agreed based on a realistic judgement about the ongoing proportion of residual waste for which provision will need to be made.	Comment noted.
WLPIC0305	David L Walker Ltd (on behalf of Tarmac)	14	No – The proposal to divert 90% of arisings is not realistic or practical as it fails to recognise the nature and composition of these arisings, which can comprise soils and clay. These materials are generally not able to be recycled or recovered for an alternative use in the sense of energy generation and therefore need disposal and/or recovery via separate means. The document needs to recognise the importance of "recovery" in the restoration of minerals workings.	In line with the Waste Management Plan for England and the Regional Spatial Strategy, quarry restoration counts towards both of these targets.
WLPIC0338	Iceni Projects (on behalf of BP Mitchell)	14	Yes – BP Mitchell are the most successful inert waste to recycled aggregate operation in the county. The company is highly adept at recovering waste generated by C, D & E and the only impediment to	The limit on development at specific sites is stipulated by individual planning permissions rather than the Local Plan production.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			BP Mitchell recycling greater quantities of waste are the capacity issues at their existing sites.	
WLPIC0366	HCC Ecology	14	Yes -	Selection noted.
WLPIC0472	Essex County Council	14	Yes – These recycling targets remain relevant as they have not been updated by any subsequent legislation or national plan.	See General Statement.
WLPIC0511	Transition Town Letchworth	14	No – Germany already recycles 90% of CD&E waste so a 90% target should be achievable before 2031.	Comment noted.
<p>Issue 15 Do you agree with the county council's intention to use figures from the Hazardous Waste Data Interrogator to establish the quantity of hazardous waste generated in the county?</p> <p> <input type="radio"/> Yes <input type="radio"/> No </p> <p>General Statement</p> <p>The use of the Hazardous Waste Data Interrogator received unanimous support and will be used to establish hazardous waste arisings in the emerging WLP's Waste Capacity Gap study.</p>				
WLPIC0016	Royston Council	15	Yes – There is lots of medical expansion in the area.	Comment noted. The majority of hospital waste is incinerated on-site and does not require further processing.
WLPIC0079	North Hertfordshire District Council	15	Yes -	Selection noted.
WLPIC0104	Watford Borough Council	15	Yes -	Selection noted.
WLPIC0131	Three Rivers District Council	15	Yes -	Selection noted.
WLPIC0159	Stevenage Borough Council	15	Yes -	Selection noted.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
WLPIC0339	Iceni Projects (on behalf of BP Mitchell)	15	Yes -	Selection noted.
WLPIC0367	HCC Ecology	15	Yes -	Selection noted.
WLPIC0443	Environment Agency	15	Yes – The HWDI is a more accurate record of waste movement. However, as some hazardous materials can pass through several facilities, there can be issues with double counting.	Comment noted.
WLPIC0473	Essex County Council	15	Yes -	Selection noted.
WLPIC0512	Transition Town Letchworth	15	Yes -	Selection noted.
<p>Issue 16 Which growth scenario do you think is the most appropriate for the Capacity Gap Report to use to forecast the future quantity of hazardous waste generated in the county?</p> <ul style="list-style-type: none"> ○ Low Growth – maintain the 2015 arising figure ○ High Growth – extrapolating the recent trends of arisings ○ Another scenario <p>General Statement</p> <p>The High Growth scenario received almost unanimous support and will be used to predict future waste arisings in the emerging WLP's Waste Capacity Gap study.</p>				
WLPIC0017	Royston Council	16	High – There is lots of medical industry in the area and all local hospitals are expanding.	Comment noted. The majority of hospital waste is incinerated on-site and does not require further processing.
WLPIC0080	North Hertfordshire District Council	16	High -	Selection noted.
WLPIC0105	Watford Borough Council	16	High -	Selection noted.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
WLPIC0132	Three Rivers District Council	16	High – If using the same growth scenario in forecasting the future generation of all waste types is considered by HCC for a more consistent approach, Three Rivers support a low growth scenario.	See General Statement.
WLPIC0160	Stevenage Borough Council	16	High -	Selection noted.
WLPIC0221	St Alban City and District Council	16	Low – Forecasts should be based on lowest reasonably justifiable level of growth.	The selection of the high growth scenario is considered the most flexible approach for the WLP to take as it does not stifle innovation or the development of the waste industry based on short term low growth trends when the overall trend of waste production is to increase alongside population and economy growth in Hertfordshire.
WLPIC0340	Iceni Projects (on behalf of BP Mitchell)	16	High -	Selection noted.
WLPIC0368	HCC Ecology	16	High -	Selection noted.
WLPIC0474	Essex County Council	16	High – The High Growth scenario is considered the most appropriate given that which is started in national planning guidance.	See General Statement.
WLPIC0513	Transition Town Letchworth	16	Alternative Scenario – The amount of hazardous waste to be managed will depend on the extent of refurbishment and brownfield site clearances expected (which should be indicated by Local Plans) and the level of hazardous material (ie. asbestos) used in the existing built environment.	The WPA monitors significant non-waste developments promoted by the district and borough councils. However, the quantity of hazardous waste to be managed from refurbishment and brownfield site clearances varies significantly from site to site and is usually unknown until a site-specific analysis has been undertaken as part of individual planning applications.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
				The quantity of hazardous waste movements will continue to be monitored via the HCC Authority's Monitoring Report so significant changes in arisings will be noticed if they occur.
<p>Issue 17 Do you agree with the county council's intention to use site-by-site analysis of existing waste sites, utilising all available data, to establish the overall waste capacity of waste facilities in Hertfordshire?</p> <p> <input type="radio"/> Yes <input type="radio"/> No </p> <p>General Statement</p> <p>All consultees supported the use of a site-by-site analysis of all existing sites, using a range of data sources, to identify a realistic capacity for each waste site in order to establish a total waste capacity for Hertfordshire. Assumptions for each site will be published in updated versions of the Waste Capacity Gap Report.</p>				
WLPIC0018	Royston Council	17	Yes -	Selection noted.
WLPIC0081	North Hertfordshire District Council	17	Yes -	Selection noted.
WLPIC0106	Watford Borough Council	17	Yes -	Selection noted.
WLPIC0133	Three Rivers District Council	17	Yes -	Selection noted.
WLPIC0161	Stevenage Borough Council	17	Yes -	Selection noted.
WLPIC0209	Welwyn Hatfield District Council	17	Yes – WHBC support the intention to use a site by site approach, to assess the capacity of existing waste facilities for managing future waste arising. However, the assumptions of this assessment should be published.	See General Statement.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
WLPIC0248	Chiltern Society	17	Yes – Where over-capacity of waste sites has been identified, we consider that the priority should be to use those sites that would have the least significant environmental impact. In particular, use of any sites located within the Chilterns AONB and its setting, and the Green Belt, should be avoided if at all possible where an over-capacity has been identified. As well as protecting the landscape itself, this would help to reduce waste-related traffic within the Chilterns area.	The review of the WLP will not directly result in the closure of any existing waste sites due to an identified over-capacity.
WLPIC0264	Jane Orsborn Associates on behalf of Mr A Pinkerton of A F Pinkerton & Partners	17	Yes -	Selection noted.
WLPIC0277	CEMEX UK	17	Yes -	Selection noted.
WLPIC0306	David L Walker Ltd (on behalf of Tarmac)	17	Yes -	Selection noted.
WLPIC0341	Iceni Projects (on behalf of BP Mitchell)	17	Yes -	Selection noted.
WLPIC0369	HCC Ecology	17	Yes -	Selection noted.
WLPIC0391	Biffa Waste Services	17	Yes -	Selection noted.
WLPIC0416	Veolia Environmental Services	17	Yes – The use of a range of available data is reasonable subject to ensuring that adequate transparency is maintained to ensure rigor in the assumptions made on individual sites / facilities.	See General Statement.
WLPIC0440	Environment Agency	17	Yes – • The use of several years' worth of data, rather than	See General Statement.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			the permitted capacity, should prevent over-estimation of capacity where facilities are able to stockpile materials in times of low commodity. • It may be appropriate to bias towards more recent data where facilities show a downward trend in throughput due to regulatory compliance reasons.	
WLPIC0442	Environment Agency	17	Yes – Capacity of sites may also be limited by a permit condition.	See General Statement. This will be part of the site-by-site analysis.
WLPIC0475	Essex County Council	17	Yes -	Selection noted.
WLPIC0514	Transition Town Letchworth	17	Yes – Should review sites that process significantly different quantities of waste to that agreed in planning permission and permission should be adjusted if necessary or enforced.	The WPA enforces against waste operations that process more material than is permitted by the site's planning permission. This is identified by ongoing monitoring undertaken by case officers in the HCC Development Management team and by officers in the HCC Monitoring and Enforcement Team. It is not the remit of Plan production to identify the need to amend planning applications or to implement amendments. Whilst the WPA can enforce against operations that do not abide by existing planning permission conditions, amendments to planning permission conditions can only be made if an application is submitted to do so.

Table 5: Waste Sites and Areas – Issues 18 - 21

General Statement covering Issues 18 - 21:

Identifying Allocated Sites for future waste management facilities was widely endorsed by consultees. The identification of Areas of Search and Employment Land Areas of Search received general support but with a more mixed response. Some consultees pointed out the lack of certainty provided by Areas of Search with regards to the location of future development, and the alternative demands on employment land identified in district and borough Local Plans.

Nearly 75% of consultees supported the use of criteria-based policies to determine whether a site is suitable for waste development when used in combination with identified sites and/or areas.

Potential options for a way forward for identifying sites during the WLP review are presented in a Growth, Infrastructure, Planning and Economy Cabinet Panel Report to be presented on 05 July 2018. The County Council proposes to undertake a 'Call for Sites' exercise over summer 2018 with a view to potentially appointing independent consultants to develop and implement a site selection methodology, if appropriate, based on the response to the Call for Sites. If a site selection methodology is required, it will be developed through public consultation.

Consultees noted that no new waste management facilities have come forward on the currently adopted Allocated Sites. The County Council will reassess all currently adopted Allocated Sites, Areas of Search and Employment Land Areas of Search as part of the emerging site selection process, determining their continued viability and deliverability.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
Issue 18				
Should the Waste Local Plan identify Allocated Sites?				
<ul style="list-style-type: none"> ○ Yes ○ No 				
WLPIC0019	Royston Council	18	Yes -	Selection noted.
WLPIC0032	Herts and Middlesex Wildlife Trust	18	Yes – <ul style="list-style-type: none"> • Part of the consideration of whether a site is suitable for allocation should be its ecological context. • Site selection should follow the mitigation hierarchy 	The mitigation hierarchy and net-gain will be part of a site selection methodology if the emerging WLP looks to allocate sites to ensure that ecology can be an important

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			<p>in NPPF in that it should avoid selection of sites of significant ecological interest.</p> <ul style="list-style-type: none"> • Habitats have been mapped by the Ecological Networks Mapping system for Hertfordshire, which should be used in the planning process to guide the selection of sites. • Without stipulating a mechanism, the concept of net gain is subjective and meaningless. The DEFRA biodiversity impact assessment metric has been devised to measure net biodiversity impact on habitats. This or a locally approved metric based on the DEFRA metric should be clearly stated as the mechanism by which net impact on habitats will be measured. • Sites which do not achieve a net gain, are not compatible with the NPPF. • The LPA must conduct baseline surveys to establish if net gain is achievable by reference to the metric and species surveys before allocating sites. • All surveys must be consistent with BS 42020 and include a comprehensive ecological records search. 	consideration of a site assessment.
WLPIC0038	Hampshire County Council	18	Yes -	Selection noted.
WLPIC0058	Chilterns Conservation Board	18	Yes – Allocation of sites provides the opportunity for waste planning to be plan-led. It allows for the comparison and selection of the most appropriate sites through a plan-making process, with public consultation, sustainability appraisal and examination.	Commented noted. If sites are required, sites will be identified through a site selection process, and consulted upon at later stages of the Waste Local Plan review.
WLPIC0082	North Hertfordshire District Council	18	Yes -	Selection noted.
WLPIC0107	Watford Borough Council	18	Yes -	Selection noted.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
WLPIC0134	Three Rivers District Council	18	Yes -	Selection noted.
WLPIC0162	Stevenage Borough Council	18	Yes – HCC should work closely with LA's during their plan-making processes and waste allocations must align with policies and allocations within the relevant authorities Local Plans.	Comment noted. The Waste Local Plan will be produced in line with the adopted Development Plan. HCC will continue to consult the District and Borough Councils throughout Plan-Production.
WLPIC0175	HCC Historic & Built Environment	18	Yes – • The impact on the historic environment should be appropriately considered (as per National Planning Policy for Waste, appendix b part e.) This may be more effectively done by considering individual sites. • Any proposed site or areas of search should be appropriately assessed using the historic environment record and expert advice prior to inclusion in the Waste Local Plan.	See General Statement.
WLPIC0190	Dacorum Borough Council	18	Yes – • Yes, but only if there is a high chance of these sites actually being delivered for waste management uses. • The Borough Council would wish to be consulted prior to the Draft Plan stage, if there is any intention designating any such sites in Dacorum in the Waste Local Plan.	Viability and deliverability will be key planning considerations in the identification of potential sites. The Waste Local Plan will be produced in line with the adopted Development Plan. HCC will continue to consult the District and Borough Councils throughout Plan-Production.
WLPIC0210	Welwyn Hatfield District Council	18	Yes – • Allocated sites provide great certainty and are therefore preferable. • WHDC note that none of the eight allocated sites in the WSA Plan (2014) came forward. • WHDC considers that HCC should carry out an analysis of why the existing site allocations have failed to deliver and whether the sites should be released. Study should consider the factors	See General Statement. Viability and deliverability will be key planning considerations in the assessment of potential sites.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			developers consider to determine the suitability and deliverability of sites.	
WLPIC0223	St Alban City and District Council	18	- • To decide, more information is required on how Plan arisings forecasts will be translated into Plan targets and land use requirements • HCC should consider the potential of its own land ownership for this purpose.	Assumptions for the land take required to meet identified capacity gaps will be consulted on during subsequent stages of Plan-production. If the identification of sites is taken forward and a site selection study undertaken, then (as before) the WPA would request HCC land to be considered.
WLPIC0233	Savills on behalf of Thames Water Utilities Ltd	18	Yes -	Selection noted.
WLPIC0236	Anglian Water Services Ltd	18	Yes – Anglian Water would support the inclusion of specific allocation sites in the Waste Local Plan	Comment noted.
WLPIC0249	Chiltern Society	18	Yes – • Allocation of sites would give more certainty to the proposed locations of waste facilities • The comparison of sites at an early stage in the process would enable potential impacts on the AONB, its setting, and the Green Belt to be fully assessed. • The sites would also be subjected to an SA/SEA	See General Statement. All aspects of Plan-production will be subject to SA/SEA and HRA.
WLPIC0265	Jane Orsborn Associates on behalf of Mr A Pinkerton of A F Pinkerton & Partners	18	Yes -	Selection noted.
WLPIC0278	CEMEX UK	18	Yes -	Selection noted.
WLPIC0293	Bell Cornwell (on behalf of	18	Yes – Dundenes Limited are the owners of the land at	Comments noted. Allocated sites in the adopted plan will be re-assessed as part

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
	Dundenes Limited		Roehyde which benefits from an allocation (under Site 026) in the existing Waste Local Plan and which allows for a range of potential waste uses. Since the allocation was first made, Dundenes Limited have had a range of positive discussions with various parties all of whom have expressed a clear interest in taking the land for various forms of policy compatible waste operations.	of any site selection methodology used in Plan-production.
WLPIC0307	David L Walker Ltd (on behalf of Tarmac)	18	Yes -	Selection noted.
WLPIC0342	Iceni Projects (on behalf of BP Mitchell)	18	<p>Yes – BP Mitchell is an established and growing business which is the leading, and indeed largest, recycler of soil aggregate in the County. The existing business has proven resilient to periods of economic uncertainty and has continued to grow and deal with increased levels of waste.</p> <p>Based on the levels of growth identified for Hertfordshire in emerging District and Local Plans, the County is likely to generate far greater levels of construction and demolition waste than at present and the only impediment to BP Mitchell recycling greater amounts of material in the future are the capacity restrictions on their existing site enforced through the existing Planning Permission.</p> <p>It should be noted that BP Mitchell’s Birchall Lane site is one of only five strategic waste management sites currently operating in the County, thus perpetuating the scarcity of these types of businesses and the importance of the work that BP Mitchell currently</p>	Hertfordshire County Council acknowledges the strategic significance of BP Mitchell’s allocated Birchall Lane site. The Draft Capacity Gap Report (2017) identifies findings which support the predictions for increased volumes of Construction, Demolition and Excavation waste, and insufficient sites within Hertfordshire to manage that waste stream. Potential options for a way forward for identifying sites during the WLP review are presented in a Growth, Infrastructure, Planning and Economy Cabinet Panel Report to be presented on 05 July 2018.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			<p>conduct. Indeed, it was recently recognised that there is a dearth of waste management sites in Hertfordshire and this was a material consideration in the recent determination of an energy-from-waste plant in Hoddesdon. BP Mitchell's operation is threatened by the emerging Birchall Garden Suburb – a joint site allocation in the emerging Welwyn Hatfield Local Plan and East Herts District Plan and both are scheduled to be formally adopted in 2018. The Garden Suburb is stated to deliver approximately 2,550 new homes over the Plan period, of which 1,200 will be in Welwyn Hatfield Borough and 1,350 in East Herts District. Both of BP Mitchell's waste management sites are included within the indicative boundary for the Garden Suburb. BP Mitchell wish to continue to operate from their Birchall Lane and Burnside sites, but are attuned to the potential conflict between a considerable waste management facility and a strategic housing land allocation being located in close proximity. This threat is compounded by an employment designation in the emerging Local Plans, which is expected to lead to a continued campaign by new residents and the Garden Suburb developers to reduce the site to B1 use only, as this will be more compatible with residential development.</p> <p>In the immediate short-term, the existing facilities at Burnside and Birchall Lane are ideally placed to deal with the considerable recyclable waste that will inevitably arise during the construction of the Birchall Garden Suburb. BP Mitchell's proximity to the allocated Garden Suburb is certainly beneficial and should facilitate the effective and sustainable</p>	

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			<p>recycling of waste material during this period. However, we are aware that BP Mitchell's existing sites may not be able to continue to function as thriving and successful waste sites in the future, as the Garden Suburb moves closer to delivery and the political sensitivity of the site steadily increases. In order to continue to serve Hertfordshire and surrounding areas, BP Mitchell wishes to work proactively with the County Council to identify a new location to expand into in order to avoid being constrained by the Garden Suburb, a scenario which we consider to be very likely.</p> <p>BP Mitchell's existing sites should be demarcated as existing and continuing waste management facilities in the emerging Waste Local Plan that will remain in place over the proposed Plan period. However, we also believe that further waste sites must be designated and planned for, including an additional or replacement site for BP Mitchell to meet the growing need for construction, demolition and excavation waste and recycled aggregate within the County. Further justification for this is provided in the subsequent sections of this representation.</p>	
WLPIC0370	HCC Ecology	18	Yes -	Selection noted.
WLPIC0381	Iceni Projects (on behalf of BP Mitchell)	18	<p>Yes –</p> <p>We request that BP Mitchell's existing Birchall Lane site is not just demarcated as an existing and continuing waste management facility within the emerging Waste Local Plan, but that the capacity restrictions in place at this site are softened to enable BP Mitchell to recycle greater volumes of material.</p>	Variation in capacity restrictions at Birchall Lane cannot be altered through Plan production, and can only be changed through the planning application process. Hertfordshire County Council acknowledges the strategic significance of BP Mitchell's allocated Birchall Lane site. the Draft Capacity Gap Report (2017)

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			<p>However, it is our contention that this measure will not be enough, and we therefore respectfully request that additional waste management sites are provided to deal exclusively with C, D & E waste. At present, the County is not efficiently dealing with C, D & E waste arisings with an over-reliance on BP Mitchell's existing operations at Birchall Lane, which is one of only five strategic waste management sites currently operating in the County. Already the largest recycled aggregate facility in the County, the demand for BP Mitchell's Birchall Lane site to deal with not just Hertfordshire's but surrounding authorities' C, D & E waste arisings will only continue to grow over the Plan period. We are also conscious that BP Mitchell's existing sites may not be able to continue to function as thriving and successful waste sites in the future, as the Birchall Garden Suburb moves closer to delivery and the political sensitivity of the site steadily increases. We therefore believe it is prudent to identify potential alternative sites for BP Mitchell to relocate to at this juncture.</p>	<p>identifies findings which support the predictions for increased volumes of Construction, Demolition and Excavation waste, and insufficient sites within Hertfordshire to manage that waste stream. Potential options for a way forward for identifying sites during the WLP review are presented in a Growth, Infrastructure, Planning and Economy Cabinet Panel Report to be presented on 05 July 2018.</p>
WLPIC0387	Ware Town Council	18	<p>Yes –</p> <ul style="list-style-type: none"> • Concerned sites have not been identified in the WLPIC. • Waste sites (including HWRCs) should not be near schools or homes due to public health. • Concerned about increased transportation of waste into and out of Hertfordshire. 	<p>The Waste Local Plan Initial Consultation did not identify sites. Stakeholders and interested parties were consulted upon their support for the identification of sites at a later stage of Plan production. Potential options for a way forward for identifying sites during the WLP review are presented in a Growth, Infrastructure, Planning and Economy Cabinet Panel Report to be presented on 05 July 2018. All sites will be assessed during the Site Selection Process for their impacts on</p>

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
				public health. The emerging Waste Local Plan seeks to encourage proposals to consider sustainable transportation of waste in order to reduce the impacts of transport on local infrastructure and climate change.
WLPIC0392	Biffa Waste Services	18	Yes – Our view is that the plan should identify allocated strategic sites, both existing and proposed wherever possible in the same way as the adopted plan. We support the ongoing use of the allocated Westmill site beyond the landfill restoration end date.	Comments noted.
WLPIC0395	Biffa Waste Services	18	Yes – <ul style="list-style-type: none"> The plan must place sufficient emphasis on the positive contribution that residual waste management makes. Westmill is the only large landfill site left in the County. The current planning permission includes an end date for general waste acceptance of the end of 2021 with restoration using imported soils and restoration materials by the end of 2028. The site is an allocated site in the adopted Hertfordshire Waste Local Plan, it is of strategic importance and has the potential for a range of permanent waste management facilities as set out in the adopted waste brief. The ability of the site to accommodate additional facilities should not be discounted at this stage with the waste brief being updated and included in the new Plan. 	The emerging Waste Local Plan applies a priority order to the management of waste through the Waste Hierarchy. This recognises residual waste management as a fundamental stage to the final disposal of waste where higher level processing is not possible. If the use 'Allocated Sites' progresses through the Waste Local Plan review, all currently adopted sites will be re-assessed through the Site Selection Process and Sustainability Appraisal, where viability and deliverability will be key planning considerations in the continue identification of each site.
WLPIC0417	Veolia Environmental Services	18	Yes -	Selection noted.
WLPIC0438	HCC Waste Management and	18	- The existing eight allocated sites within the Waste	All allocated sites in the adopted plan will be re-assessed for viability and

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
	Environmental Resource Planning		Local Plan require review if the existing approach is to be retained. Sites identified need to be deliverable and fit for purpose.	deliverability as part of any site selection methodology used in Plan-production, and will be subject to Sustainability Appraisal.
WLPIC0455	Historic England	18	<ul style="list-style-type: none"> - • The cumulative impact of a number of site allocations in one location could cause significant harm to the historic environment and should also be considered in the site allocation process from the outset. • Where the significance of a heritage asset has already been compromised by unsympathetic development, consideration should still be given to whether additional change will further detract that significance in order to accord with NPPF policies. • It is expected that the cumulative effects regarding the historic environment will be addressed in any Heritage Statement. 	The impacts on heritage assets and the historic environment will be assessed for potentials sites through any site selection methodology used in Plan-production.
WLPIC0457	Historic England	18	<ul style="list-style-type: none"> - • Detailed research and analysis will be required to ascertain whether a site is a suitable location for a waste development. • The County Council should consult with conservation staff at the county and district level to properly identify any impacts that the proposed sites may have on the historic environment. 	See General Statement. The County Council will continue to consult the relevant stakeholders throughout Plan, both internally at HCC and externally within Hertfordshire's District and Borough Councils.
WLPIC0476	Essex County Council	18	Yes – Identifying Allocated Sites would be in conformity with the NPPW	Comment noted.
WLPIC0489	HCC Public Health	18	<ul style="list-style-type: none"> - HCC should recognise that individual site proposals coming forward through the Waste Local Plan may have the potential to impact on health and that these may be a concern to members of the public. 	See General Statement.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
WLPIC0515	Transition Town Letchworth	18	No – Areas of Search based on strategic modelling should be sufficient. Flexibility is lost with Specific Sites	Comment noted. Potential options for a way forward for identifying sites during the WLP review are presented in a Growth, Infrastructure, Planning and Economy Cabinet Panel Report to be presented on 05 July 2018.
WLPIC0532	HCC Property (Development Services)	18	Yes – Whilst very few of the eight allocated sites in the adopted WLP have come forward for the delivery of new waste management facilities, it is considered that in line with the requirements of the National Planning Policy for Waste (NPPW), the revised Waste Local Plan should continue to allocate sites for waste management development, provided a full review of the current sites that are identified in the Waste Site Allocations document is undertaken.	Comment noted. All adopted sites will be re-assessed as part of any site selection methodology used in Plan-production.
WLPIC0534	HCC Property (Development Services)	18	- New Barnfield has been identified as an allocated waste site (site ref: AS048) in the Waste Site Allocations document, since its adoption in July 2014. In November 2011, a planning application was submitted on this site for a 380,000 tonne per annum Recycling and Energy Recovery Facility (RERF). This was subsequently called-in by the Secretary of State (SoS) and after a public inquiry held in September/October 2013, the application was finally dismissed by the SoS in July 2015. No further planning applications for any waste use have been submitted on this site. Land that is situated within the allocated waste site at New Barnfield continues to be within the ownership of	Comment noted, all allocated sites within the adopted waste local plan will be reassessed as part of the review process.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			<p>HCC, along with further land to the west of the site and the former site of Southfield School to the north. As part of the current examination of the Welwyn Hatfield Local Plan, HCC and Welwyn Hatfield Borough Council agreed a Statement of Common Ground in January 2018 stating that HCC would make New Barnfield available for a secondary school, if additional housing is proposed within the plan.</p> <p>The treatment of the county's municipal waste will shortly be considered by way of a Public Inquiry into a similarly sized facility that is located on land at Ratty's Lane, Hoddesdon.</p> <p>The possibility of the emerging Welwyn Hatfield Local Plan having to accommodate additional housing growth will have significance for the provision of the county's services, particularly for education. In the event that the use of the site as a secondary school becomes necessary, WHBC and HCC would work together to secure an alternative location for an HWRC. We consider this should be taken into account when determining new waste sites for allocation, it is therefore recommended that the new Waste Local Plan should not seek the re-allocation of New Barnfield as an allocated waste site.</p>	
WLPIC0540	HCC Highways	18	<p>Yes –</p> <p>Such a process allows for a more meaningful judgement to be made about the overall transport implications for each site. This could be a 'seiving' exercise to establish as to what is likely to be acceptable in-principle in transport terms. An early high level highway review helps to identify suitability</p>	<p>The impacts on transport will be assessed for potentials sites through any site selection methodology used in Plan-production.</p>

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			of access/egress arrangements as well as potential highway issues/concerns.	
WLPIC0549	Hertford Town Council	18	Yes – Members of Hertford Town Council believe the WL P should identify both 'Areas of Search' and 'Allocated Sites'.	Comment noted.
Issue 19 Should the Waste Local Plan identify Areas of Search? <ul style="list-style-type: none"> ○ Yes ○ No 				
WLPIC0020	Royston Council	19	Yes -	Selection noted.
WLPIC0039	Hampshire County Council	19	Yes -	Selection noted.
WLPIC0059	Chilterns Conservation Board	19	No – This is an inferior process to allocation. Allocation gives more certainty about the precise sites suitable for development.	See General Statement.
WLPIC0083	North Hertfordshire District Council	19	Yes – Such a search is welcomed, however, it should be clear that these are broader areas that should be considered only in event that allocated sites do not / are unlikely to come forward.	See General Statement.
WLPIC0108	Watford Borough Council	19	No – Potential to identify locations close to existing residential areas would conflict with work of other Local Planning Authorities. Waste processing plants will constrain development possibilities next to residential areas.	Comment noted. The Emerging WLP should look to guide waste development to the locations where the majority of waste is produced in line with the Proximity Principle included in European legislation. Proposals for any waste development will be determined through the planning application process and assessed accordingly, taking account of potential

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
				sensitive uses nearby. This assessment will incorporate development proposed by the District and Borough Councils.
WLPIC0135	Three Rivers District Council	19	Yes -	Selection noted.
WLPIC0163	Stevenage Borough Council	19	Yes – Close working with Local Authorities is required to ensure areas of search are reflective of policies and allocations within their Local Plans.	The Waste Local Plan will be produced in line with the adopted Development Plan. HCC will continue to consult the District and Borough Councils throughout Plan-Production.
WLPIC0176	HCC Historic & Built Environment	19	- Any proposed site or areas of search should be appropriately assessed using the historic environment record and expert advice prior to inclusion in the Waste Local Plan	Impacts on the historic environment will be assessed for any potential 'Area of Search', and will be subject to a Sustainability Appraisal. The County Council will continue to consult the relevant officers both internally at HCC and externally throughout the Plan period.
WLPIC0191	Dacorum Borough Council	19	No – • 'Area of Search A for Local Authority Collected Organic Waste Recovery' is partly within Dacorum. • This Area of Search contains extensive areas where waste management uses will not normally be permitted, such as existing residential areas and Green Belt areas. • It is considered, therefore, that the Area of Search gives a misleading impression of where waste management uses are generally acceptable. Consequently, the Borough Council's view is that Areas of Search should not be defined in the Waste Local Plan. • It is felt that sufficient guidance will be provided by a combination of allocated sites (Issue 18),	The Emerging WLP should look to guide waste development to the locations where the majority of waste is produced in line with the Proximity Principle included in European legislation. Areas of Search offer broad guidance for the location of future waste management capacity based on distances from major population centres. Proposals for any waste development within a potential Area of Search will be determined through the planning application process and assessed accordingly, taking account of potential sensitive uses nearby.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			Employment Land Areas of Search (Issue 20), criteria based policies (Issue 21) and safeguarded sites (Issue 22).	
WLPIC0211	Welwyn Hatfield District Council	19	- • Sites have failed to come forward in the Waste Core Strategy five AOS. • As part of the WLP review, HCC should determine why this policy approach has failed to deliver, whether the areas in question, the policy itself is ineffective, or whether the assessment of the need for such facilities is incorrect.	All relevant adopted sites will be re-assessed for viability and deliverability through the Site Selection Process, and will be subject to a Sustainability Appraisal.
WLPIC0250	Chiltern Society	19	No – Site allocation would give more certainty.	Comment noted.
WLPIC0266	Jane Orsborn Associates on behalf of Mr A Pinkerton of A F Pinkerton & Partners	19	No – This is too vague an approach and does not give adequate certainty.	Comment noted.
WLPIC0279	CEMEX UK	19	Yes -	Selection noted.
WLPIC0294	Bell Cornwell (on behalf of Dundenes Limited)	19	Yes -	Selection noted.
WLPIC0308	David L Walker Ltd (on behalf of Tarmac)	19	Yes -	Selection noted.
WLPIC0343	Iceni Projects (on behalf of BP Mitchell)	19	Yes -	Selection noted.
WLPIC0371	HCC Ecology	19	Yes -	Selection noted.
WLPIC0393	Biffa Waste Services	19	Yes -	Selection noted.
WLPIC0477	Essex County	19	Yes –	Comment noted.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
	Council		Identifying Areas of Search would be in conformity with the NPPW	
WLPIC0516	Transition Town Letchworth	19	Yes – Areas of Search based on strategic analysis behind their distribution to minimise transport costs and environmental impact. Optimisation should allow the use of out-of-county services if this reduces cost in terms of carbon emissions and value for money.	Comment noted. Hertfordshire County Council's Draft Waste Capacity Gap Report (2017) identifies the capacity gap between the capacity of Hertfordshire's waste management facilities, and the volume of waste produced in Hertfordshire. Areas of Search can be used for specific waste streams or for specific facility types, and can help guide waste management towards certain areas of greatest population, minimising the mileage that waste will be transported for once it has been generated.
WLPIC0533	HCC Property (Development Services)	19	<p>Yes – The Hertfordshire County Council Household Waste Recycling Centre (HWRC) Annex to the LAC Waste Spatial Strategy, was published in September 2017 and identifies two areas of search for new HWRCs in the county. The purpose of these HWRC areas of search is to find three new HWRC super sites where further provision is required to meet future need.</p> <p>One new HWRC is needed within the area of search surrounding Bishop's Stortford and Sawbridgeworth and it is intended that this will replace the existing HWRC site at Bishop's Stortford.</p> <p>Two further HWRCs are needed within the other area of search covering central and western Hertfordshire. These two new HWRCs could potentially replace the existing HWRCs at Cole Green and St Albans and</p>	Comment noted. The emerging WLP will reflect the findings from the Waste Disposal Authority's work into planning policy.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			<p>the expansion of the HWRC at Hemel Hempstead, which is deemed unviable.</p> <p>HCC as a service provider considers that the new Waste Local Plan should show the location of the two HWRC areas of search, as shown on Plan 7 of the September 2017 HWRC Annex. In addition to this, we would suggest that the plan shows specific allocations for the three new HWRCs within these areas of search.</p>	
WLPIC0550	Hertford Town Council	19	<p>Yes – Members of Hertford Town Council believe the WL P should identify both ‘Areas of Search’ and ‘Allocated Sites’.</p>	Comment noted.
<p>Issue 20 Should the Waste Local Plan continue to identify Employment Land Areas of Search?</p> <ul style="list-style-type: none"> ○ Yes ○ No 				
WLPIC0021	Royston Council	20	Yes -	Selection noted.
WLPIC0040	Hampshire County Council	20	Yes -	Selection noted.
WLPIC0084	North Hertfordshire District Council	20	<p>Yes – There should be a clear hierarchy of preference for Allocated Sites, Areas of Search and Employment Land Areas of Search (ELAS).</p>	Comment noted.
WLPIC0109	Watford Borough Council	20	No - Not all employment areas are suitable. Watford might prioritise housing on or adjacent to current employment areas. Specific sites are better.	The ELAS included in the adopted Waste Local Plan were identified following a review of areas of employment land in district and borough Local Plans with regards to their suitability and compatibility to support different waste management

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
				facility types and sizes. A similar review would also be undertaken if ELAS were to be included in the emerging WLP, potentially leading to exclusions or changes to currently adopted ELAS. Proposals for any waste development within an ELAS will be determined through the planning application process and assessed accordingly.
WLPIC0136	Three Rivers District Council	20	Yes -	Selection noted.
WLPIC0164	Stevenage Borough Council	20	- Concerned about loss of Employment Land in Stevenage for waste use. "We would be keen for HCC to consider the relocation of the waste and recycling centre [...] in order to free up additional land for employment use"	The WLP will reflect the LACW Spatial Strategy and HWRC addendum document which identifies the Stevenage HWRC for an extension, subject to HCC purchasing the adjacent land. Existing HWRCs are subject to safeguarding policies and where continued need is identified would need to be relocated prior to any closure.
WLPIC0177	HCC Historic & Built Environment	20	- Any proposed Employment Land Areas of Search should be appropriately assessed using the historic environment record and expert advice prior to inclusion in the Waste Local Plan.	Impacts on the historic environment will be assessed for any potential Employment Land Area of Search and will be subject to a Sustainability Appraisal. The County Council will continue to consult the relevant officers both internally at HCC and externally throughout the Plan period.
WLPIC0192	Dacorum Borough Council	20	Yes – <ul style="list-style-type: none"> • Some of the ELAS in Dacorum should be reduced in size or deleted so as to only include land expected to remain mainly in B-class employment uses. • ELAS006 Maylands (East and West): the extent of the Maylands East should be reconsidered, whilst 	The ELAS included in the adopted Waste Local Plan were identified following a review of areas of employment land in district and borough Local Plans with regards to their suitability and compatibility to support different waste management

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			<p>Maylands West should be reduced in size or deleted – due to changes in land use through several planning applications.</p> <ul style="list-style-type: none"> • ELAS007 Swallowdale: Viking House, Swallowdale Lane – planning permission (4/02772/15/MFA) granted for residential development and the site has been cleared. This site should be excluded from ELAS007. • ELAS164 Icknield Way, Tring: The eastern part of this ELAS should be deleted as it is not in employment use. Also, the Dacorum Site Allocations Development Plan Document has removed this land from the General Employment Area and allocated most of it for housing. 	<p>facility types and sizes. A similar review would also be undertaken if ELAS were to be included in the emerging WLP, potentially leading to exclusions or changes to currently adopted ELAS. Proposals for any waste development within an ELAS will be determined through the planning application process and assessed accordingly</p> <p>Should the use of ELAS be progressed further through Plan Production, all adopted sites will be reassessed for their suitability, leading to exclusions or changes in area where required.</p>
WLPIC0214	Welwyn Hatfield District Council	20	<p>Yes –</p> <ul style="list-style-type: none"> • Supports principle idea behind ELAS. • HCC should undertake a review of the suitability of the adopted ELAS. • Alternatively, a criteria based approach could be used to remove the need to identify specific ELAS and provide HCC with greater flexibility. 	<p>Should the use of ELAS be progressed further through Plan-production, all adopted sites will be reassessed for their suitability, potentially leading to exclusions or changes in area.</p>
WLPIC0225	St Alban City and District Council	20	<p>No –</p> <ul style="list-style-type: none"> • New safeguarding policy should incorporate and replace the current Employment Land Areas of Search (ELAS) SPD. • Use of areas of search for new sites, combined with elements of safeguarding, in an SPD is unsatisfactory, and creates uncertainty as it does not sufficiently recognise constraints of pre-existing employment land use. • Some areas of ELAS are not suitable for most waste uses for various different reasons. 	<p>Employment Land Areas of Search support different waste management facility types and sizes, based on the variety and compatible nature of certain Employment Areas. Should the use of ELAS be progressed further through Plan production, all adopted sites will be reassessed for their suitability, leading to exclusions or potential changes in area.</p>
WLPIC0267	Jane Orsborn	20	No –	Comment noted.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
	Associates on behalf of Mr A Pinkerton of A F Pinkerton & Partners		<ul style="list-style-type: none"> • It causes confusion. • A shortage of employment land in some Districts – ELAS exacerbate this. 	
WLPIC0280	CEMEX UK	20	Yes -	Selection noted.
WLPIC0295	Bell Cornwell (on behalf of Dundenes Limited)	20	Yes – Should seek to exploit to the full the potential of allocated sites or specific areas of search to encourage these to come forward first.	Comment noted. Employment Land Areas of Search can support Allocated Sites and larger Areas of Search, helping to guide development of different waste facility types and sizes towards areas that are compatible with waste management.
WLPIC0309	David L Walker Ltd (on behalf of Tarmac)	20	Yes -	Selection noted.
WLPIC0344	Iceni Projects (on behalf of BP Mitchell)	20	Yes -	Selection noted.
WLPIC0372	HCC Ecology	20	Yes -	Selection noted.
WLPIC0419	Veolia Environmental Services	20	No – In line with NPPW, it should not be necessary to identify Employment Land Areas of Search as all employment land should be given priority.	Hertfordshire County Council acknowledges that the NPPW prioritises sites identified for employment use as a location for waste management facilities. By assessing all employment land put forward through the Development Plan, Employment Land Areas of Search may rule out employment land that is not suitable for waste management due to the proximity of non-compatible land uses, or other constraints which make the location unsuitable for waste development.
WLPIC0478	Essex County Council	20	Yes – It would be appropriate to re-assess those ELAS in	Should the use of ELAS be progressed further through Plan-production, all

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			the existing WLP for their continued appropriateness. Such an approach is in conformity with the NPPW requirement to “consider a broad range of locations including industrial sites”.	adopted sites will be reassessed for their suitability, potentially leading to exclusions or changes in area.
WLPIC0517	Transition Town Letchworth	20	No – Areas of Search based on strategic modelling should be sufficient. Industry will locate exactly where costs are optimal.	Comment noted.
<p>Issue 21 Should the County Council use criteria-based policies in the Waste Local Plan to determine whether a site is suitable for waste development?</p> <ul style="list-style-type: none"> ○ Yes, instead of identifying sites and/or areas ○ Yes, in combination with identified sites and or/areas ○ No 				
WLPIC0022	Royston Council	21	Yes (Instead of sites/areas) -	Selection noted.
WLPIC0033	Herts and Middlesex Wildlife Trust	21	Yes (in combination with site/areas) – Criteria based policies stipulating that measurable net gain to biodiversity must be achieved by waste management and the tool by which net gain is to be determined must be included in the waste plan (see previous representation issue 18)	The impact of applications on biodiversity and biodiversity net gain will be included within policy/ies regardless of whether a policy-based approach is used in the emerging WLP.
WLPIC0041	Hampshire County Council	21	Yes (in combination with site/areas) – This allows the WPA to control windfall development and will assist developers in identifying additional sites.	Comment noted.
WLPIC0060	Chilterns Conservation Board	21	Yes (in combination with site/areas) – Yes because as it will provide a policy framework for determining any smaller or speculative applications that come forward during the plan period. The main strategic waste sites should be allocated through the Waste Local Plan.	See General Statement

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
WLPIC0085	North Hertfordshire District Council	21	Yes (Instead of sites/areas) – There should be a clear hierarchy of preference for Allocated Sites, Areas of Search and Employment Land Areas of Search (ELAS).	See General Statement
WLPIC0110	Watford Borough Council	21	Yes (in combination with site/areas) – Would be unreasonable to refuse an application on a generally unallocated suitable site because it had not been anticipated.	See General Statement
WLPIC0137	Three Rivers District Council	21	Yes (in combination with site/areas) -	Selection noted.
WLPIC0165	Stevenage Borough Council	21	Yes (in combination with site/areas) – This approach provides a comprehensive assessment of sites and allows for a fully informed decision to be made on individual sites. However, this should be done in conjunction with / working closely with Local Authorities, as any allocations would need to align with those Local Plans.	The Waste Local Plan will be produced in line with the adopted Development Plan. HCC will continue to consult the District and Borough Councils throughout Plan production.
WLPIC0178	HCC Historic & Built Environment	21	- Any proposed sites or areas of search should be appropriately assessed using the historic environment record and expert advice prior to inclusion in the Waste Local Plan.	Impacts on the historic environment will be assessed for any potential site or area, and will be subject to a Sustainability Appraisal. The County Council will continue to consult the relevant officers both internally at HCC and externally throughout the Plan period.
WLPIC0193	Dacorum Borough Council	21	Yes (in combination with site/areas) – Criteria-based policies should be used in combination with Allocated Sites (Issue 18), Employment Land Areas of Search (Issue 20) and Safeguarded Sites (Issue 22).	See General Statement
WLPIC0237	Anglian Water Services Ltd	21	Yes (in combination with site/areas) – • Waste management development can be proposed on allocated and non-allocated sites or sites which	See General Statement. Wastewater requirements are closely aligned to the proposals for residential

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			<p>are currently safeguarded for waste management purposes.</p> <ul style="list-style-type: none"> • Where a type of waste management development is proposed and is not currently allocated the plan should specify the criteria which will be used to determine the application. • A specific policy relating to water recycling be included in the Local Plan. 	<p>development in district and borough Local Plans. Wastewater is a key infrastructural consideration in all the emerging Local Plans and as such, the need for additional facilities/capacity is being dealt with by the districts and boroughs with involvement of the relevant wastewater service provider. If there are specific strategic allocations needed for waste water treatment facilities, these should be highlighted by the utilities.</p>
WLPIC0251	Chiltern Society	21	<p>Yes (in combination with site/areas) – We would expect the larger strategic sites to be allocated in the Plan, but there need to be criteria-based policies against which any additional sites that come forward can be assessed.</p>	See General Statement
WLPIC0268	Jane Orsborn Associates on behalf of Mr A Pinkerton of A F Pinkerton & Partners	21	<p>Yes (in combination with site/areas) – must be a generic policy against which all waste applications are considered to deal with proposals that come forward on non-designated sites</p>	<p>Comment noted. 'Policy 7: General criteria for assessing planning applications outside of identified locations' is proposed as an emerging Development Management Policy in the Waste Local Plan Review, detailed in Chapter 11 of the Initial Consultation document.</p>
WLPIC0281	CEMEX UK	21	<p>Yes (in combination with site/areas) –</p> <ul style="list-style-type: none"> • Sites and areas should allow for flexibility and be suitable for different types of facilities. • Criteria-based policies would provide a means of assessing sites if those identified in the Plan do not come forward. 	See General Statement
WLPIC0296	Bell Cornwell (on behalf of Dundenes Limited)	21	No -	Selection noted.
WLPIC0310	David L Walker Ltd	21	No -	Selection noted.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
	(on behalf of Tarmac)			
WLPIC0345	Iceni Projects (on behalf of BP Mitchell)	21	Yes (in combination with site/areas) –	Selection noted.
WLPIC0373	HCC Ecology	21	Yes (in combination with site/areas) – Identification of sites gives a level of certainty and expectations, whilst criteria based policies also enable a level of future flexibility which can be assessed on a case by case basis.	See General Statement
WLPIC0394	Biffa Waste Services	21	Yes (in combination with site/areas) – The WLP should rely on a criteria based approach so that applicants be sure that any site they are promoting meets the requirements of the plan.	See General Statement
WLPIC0418	Veolia Environmental Services	21	Yes (in combination with site/areas) – To ensure flexibility and to take into consideration changing circumstances.	See General Statement
WLPIC0434	HCC Waste Management and Environmental Resource Planning	21	Yes (in combination with site/areas) – Allocations to date have not delivered satisfactorily for the WDA or industry and allocation has questionable merit in this context. The WPA may wish to consider a wider policy-based approach for bringing sites forward.	See General Statement
WLPIC0452	Historic England	21	Yes (in combination with site/areas) – When used in combination with site allocations a set of clear criteria will be helpful in establishing the parameters when considering whether or not a site is suitable for waste development it.	See General Statement
WLPIC0479	Essex County Council	21	Yes – In order to maintain a Plan-led system and to give a degree of certainty, site allocations, Areas of Search and ELAS should be the primary means to plan for waste management sites. However, criteria-based	Comment noted. Criteria-based policies can help guide development for proposals outside of allocated sites/areas.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			policies have great merit in allowing the Plan to best respond to changing circumstances and new opportunities.	
WLPIC0518	Transition Town Letchworth	21	Yes (in combination with site/areas) – Residential areas can be protected through criteria-based policies but strategic planning will inform Areas of Search	Comment noted.

Table 6: Safeguarding – Issues 22 - 23

General Statement covering Issues 22 & 23:

There was unanimous support from consultees regarding the safeguarding of sites. Over a third of consultees favoured safeguarding all existing or permitted waste facilities, as currently implemented by the adopted Waste Local Plan. There was minor backing for a more focussed method of safeguarding, with examples provided on what a ‘strategic sites only’ or a ‘safeguarding with exemptions’ approach could include.

Implementing consultation areas around safeguarded waste sites was universally supported by consultees, noting their importance in preventing the encroachment of incompatible development on waste sites. Ongoing communication between stakeholders and the County Council will be maintained, establishing the size of any consultation area, and their potential extension into neighbouring authorities.

It is therefore proposed that in line with stakeholder support, and national policy, a safeguarding policy will be developed which identifies consultation areas around all sites, and identifies all relevant factors that should be considered by the LPA and WPA during decision-making when proposed development has the potential to affect any relevant waste site. The County Council also proposes establishing Waste Consultation Areas (the size of which is currently undefined) to trigger communication between planning authorities when non-waste developments could indirectly impact existing operational waste uses.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
Issue 22 What sites should be safeguarded in the Waste Local Plan? <ul style="list-style-type: none"> ○ All waste sites, continuing the approach of the adopted safeguarding policy ○ All waste sites with certain exceptions, please give details of potential exceptions ○ Strategic waste sites, please give details of what should be considered a strategic waste site ○ No waste sites 				
WLPIC0023	Royston Council	22	All sites – Ensure that no sites are lost.	Comment noted

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
WLPIC0042	Hampshire County Council	22	Strategic sites – Sites should be considered 'strategic' if they are facilities that either have an ability to manage a particular quantity of material each year, a facility contributing to a shortfall of management capacity of a particular waste stream, the location of a facility, or a combination these elements.	See General Statement. In order to safeguard strategic sites, a definition of 'strategic' would be required to assist in identifying Hertfordshire's strategic sites. This could consider the capacity of the site, contribution to management of a specific waste stream or the facility location.
WLPIC0061	Chilterns Conservation Board	22	All sites -	Selection noted.
WLPIC0086	North Hertfordshire District Council	22	With exceptions -	Selection noted.
WLPIC0111	Watford Borough Council	22	Strategic sites – Strategic sites are less able to be relocated.	See General Statement. In order to safeguard strategic sites, a definition of 'strategic' would be required to assist in identifying Hertfordshire's strategic sites. This could consider the capacity of the site, contribution to management of a specific waste stream or the facility location.
WLPIC0138	Three Rivers District Council	22	All sites -	Selection noted.
WLPIC0167	Stevenage Borough Council	22	With exceptions – <ul style="list-style-type: none"> • Futile to disregard adopted allocated sites in the new Waste Local Plan • If work to produce the new Local Plan identifies waste sites that could be relocated to a more appropriate location, policies should be flexible enough to allow this to happen. 	See General Statement.
WLPIC0194	Dacorum Borough Council	22	Strategic sites – <ul style="list-style-type: none"> • Dacorum Borough Council would also support Option B - as long as only important waste sites are 	See General Statement. In order to safeguard strategic sites, a definition of 'strategic' would be required to assist in

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			<p>safeguarded and there is some flexibility to accept non-waste uses if there is clear justification.</p> <ul style="list-style-type: none"> • The consultation document does not reach conclusions on which sites would be classified as 'strategic'. Currently, the Waste Site Allocations document identifies five 'Existing Strategic Sites' and one of these is in Dacorum: SA060 Cupid Green Depot, Hemel Hempstead (Inset Map 003) • Paragraph 9.4 in the consultation document mentions the existing strategic sites, but it is not clear whether the intention is to give any policy protection to these sites in the Waste Local Plan. • The Cupid Green Depot is within an 'Area of residential opportunity', shown on Figure 22 in the Dacorum Core Strategy and referred to in Figure 18. This reflects the possibility that the depot may be relocated. • Possible depot relocation are expected to be reached in the new Dacorum Local Plan. If a proposed new depot site is found in time, it would be appropriate to show it as an Allocated Site in the Waste Local Plan • Further discussions should take place with the Borough Council regarding the depot issue before the Draft Waste Local Plan is prepared. 	<p>identifying Hertfordshire's strategic sites. This could consider the capacity of the site, contribution to management of a specific waste stream or the facility location.</p> <p>The Waste Local Plan will be produced in line with the adopted Development Plan. HCC will continue to consult the District and Borough Councils throughout Plan production and work with them to achieve sustainable waste management across the county.</p>
WLPIC0212	Welwyn Hatfield District Council	22	<p>With exceptions –</p> <ul style="list-style-type: none"> • Safeguard with exceptions. • Exceptional circumstances could include where an existing use is causing an environmental nuisance that cannot be controlled via enforcement action. • Additionally, waste sites with permission that have failed to be implemented as they may no longer be suitable to meet the needs of the industry. 	<p>See General Statement. In order to safeguard sites with exceptions, a list of criteria/thresholds is required to determine exactly which sites are excluded. Exceptions would be included in the Regulation 18 Draft WLP for consultation.</p>

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
WLPIC0224	St Alban City and District Council	22	Strategic sites – <ul style="list-style-type: none"> • Safeguard Strategic Sites through a safeguarding policy and associated consultation zone. • Network should include a comprehensive network of Waster Transfer Sites and HWRCs. • Policy should include criteria / requirements for any potential applications that propose loss of safeguarded sites. • Plan should include well-reasoned justification and evidence for the importance of this strategic network – not just all sites. • It should be clear that important sites / facilities that are newly developed under Plan policies will usually contribute to this network and will then be safeguarded under this policy 	See General Statement. In order to safeguard strategic sites, a definition of 'strategic' would be required to assist in identifying Hertfordshire's strategic sites. This could consider the capacity of the site, contribution to management of a specific waste stream or the facility location.
WLPIC0238	Anglian Water Services Ltd	22	All Sites – Continuing the existing approach unless it can be demonstrated that there is no longer a need for a specific site or sites to be safeguarded or that the proposed use is compatible with the existing waste management use	Comment noted.
WLPIC0252	Chiltern Society	22	All Waste Sites – This approach gives the most certainty as to where waste management facilities are proposed.	Comment noted.
WLPIC0269	Jane Orsborn Associates on behalf of Mr A Pinkerton of A F Pinkerton & Partners	22	With exceptions – The site operator should be asked to confirm their intentions before any site is automatically safeguarded. There may be legitimate reasons why some waste sites are no longer suitable for waste use.	See General Statement. In order to safeguard sites with exceptions, a list of criteria/thresholds is required to determine exactly which sites are excluded. Exceptions would be included in the Regulation 18 Draft WLP for consultation.
WLPIC0282	CEMEX UK	22	All Sites – <ul style="list-style-type: none"> • Safeguarding is a material planning consideration and does not rule out alternative development. 	Noted. No response necessary.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			<ul style="list-style-type: none"> This approach would reinforce the presumption that waste development should be safeguarded and provide the starting point for discussion between relevant parties. 	
WLPIC0311	David L Walker Ltd (on behalf of Tarmac)	22	All sites – The NPPF is clear on the need to safeguard strategic elements including waste management facilities. This is a transparent approach that ensures that conflicts in the planning system can be avoided as much as possible.	Noted. No response necessary.
WLPIC0346	Iceni Projects (on behalf of BP Mitchell)	22	With exceptions – Some sites have multiple land use designations, such as BP Mitchell. A balance may be needed in order to ensure that the Development Plan for such sites is not in conflict.	See General Statement. In order to safeguard sites with exceptions, a list of criteria/thresholds is required to determine exactly which sites are excluded. Exceptions would be included in the Regulation 18 Draft WLP for consultation.
WLPIC0374	HCC Ecology	22	With exceptions – This option enables some flexibility and should ensure that those sites which are required or legally operating under existing planning permission are retained.	See General Statement. In order to safeguard sites with exceptions, a list of criteria/thresholds is required to determine exactly which sites are excluded. Exceptions would be included in the Regulation 18 Draft WLP for consultation.
WLPIC0397	Biffa Waste Services	22	All sites – All existing and allocated sites.	Comment noted.
WLPIC0404	Firstplan (on behalf of Aggregate Industries UK)	22	All sites – This would ensure that all waste sites are safeguarded continuing the approach of the currently adopted safeguarding policy. Other options which would either take away safeguarding in its entirety or which envisage removal of safeguarding of sites which are subject to Lawful Development Certificates are strongly objected to. Such an approach has the potential to undermine the provision of waste sites	See General Statement.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			<p>within the County.</p> <p>Aggregate Industries' Hatfield Road site is subject to a Lawful Development Certificate and makes a valuable contribution toward inert waste recycling within the County. By virtue of the currently adopted safeguarding policy – and the site being identified in the AMR it is currently subject to safeguarding. The established safeguarding approach acknowledges that safeguarding existing sites reduces the need for new facilities and searching for new sites.</p> <p>Without appropriate safeguarding policies in place, which clearly identify and define existing waste sites, compliance with the NPPW requirements for planning authorities to safeguard existing waste sites will be more challenging. There should be a continuation of the current policy approach of identification of safeguarded sites, which are subsequently monitored, reviewed and updated annually.</p>	
WLPIC0435	HCC Waste Management and Environmental Resource Planning	22	<p>With exceptions –</p> <p>Whilst safeguarding matches national policy existing sites should be reviewed to ensure they are delivering waste management and are fit for purpose</p>	See General Statement.
WLPIC0480	Essex County Council	22	<p>All sites –</p> <p>The WLP should safeguard all sites and draft the policy such that the Authority can use its discretion to object to a proposal or not based on an appreciation of the local situation as it exists at the time.</p>	See General Statement.
WLPIC0494	HCC Public Health	22	<p>-</p> <p>With regards the decisions around waste sites and safeguarding, our views is that whichever policy</p>	Health Impact Assessments can only be requested for new proposals or applications at existing operations and will

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			approaches are adopted they should be informed by - and incorporate - the requirement for Health Impact Assessment to be undertaken.	not form part of the safeguarding mechanism.
WLPIC0519	Transition Town Letchworth	22	Strategic Sites – Strategic sites are the initial processors of district council waste collections and they should be located to minimise distance travelled by lorries.	See General Statement.
WLPIC0537	Hunsdon Parish Council	22	With exceptions – • Sites that have obtained Lawful Development Certificates should not be safeguarded. • Sites that cannot obtain consent through planning application procedures because they are contrary Policy should not be safeguarded. • Safeguarding CLD sites may impact Neighbourhood Plans / Planning.	See General Statement.
Issue 23 Should the Waste Local Plan include consultation areas around safeguarded waste sites? <ul style="list-style-type: none"> ○ Yes ○ No 				
WLPIC0024	Royston Council	23	Yes -	Selection noted.
WLPIC0043	Hampshire County Council	23	Yes -	Selection noted.
WLPIC0062	Chilterns Conservation Board	23	Yes -	Selection noted.
WLPIC0087	North Hertfordshire District Council	23	Yes -	Selection noted.
WLPIC0112	Watford Borough Council	23	Yes – It will be important for Watford and HCC to work together to maintain up-to-date GIS maps so as to flag up any applications that trigger consultation	Hertfordshire County Council will work with District and Borough Councils to ensure GIS records are maintained for ease of communication and consultation between

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			letters to HCC.	the councils.
WLPIC0139	Three Rivers District Council	23	Yes -	Selection noted.
WLPIC0166	Stevenage Borough Council	23	Yes -	Selection noted.
WLPIC0195	Dacorum Borough Council	23	Yes – The Council requests that it is consulted on the size of consultation areas before the Draft Waste Local Plan is produced	Hertfordshire County Council will work with District and Borough Councils throughout Plan-production. District and Borough Councils will help influence policy production, including potential policies covering safeguarding and the size of consultation areas.
WLPIC0213	Welwyn Hatfield District Council	23	Yes – • WCA should be clear on a GIS layer and related to the extent of the likely impact. • Help ensure non-waste uses are compatible with and do not adversely impact the operations of existing waste management facilities	Hertfordshire County Council will work with District and Borough Councils to ensure GIS records are maintained for ease of communication and consultation between the councils.
WLPIC0239	Anglian Water Services Ltd	23	Yes – • Water Recycling Centres were built at a distance from existing development because of odour associated with the operation of the sites. • Encroachment of receptors could lead to restrictions on the continued use of Anglian Water's existing water recycling infrastructure. • Anglian Water would ask that the Local Plan include reference to the need to consult the Waste Planning Authority and Anglian Water to ensure the continued use of existing water recycling centre sites.	Hertfordshire County Council recognises the importance and sensitive nature of Water Recycling Centres, and the restrictive impact of encroaching non-compatible development. Hertfordshire County Council will work with Anglian Water and relevant planning authorities to ensure the continuation of consultation on development which may threaten Water Recycling Centres.
WLPIC0253	Chiltern Society	23	Yes -	Selection noted.
WLPIC0270	Jane Orsborn Associates on behalf of Mr A	23	Yes -	Selection noted.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
	Pinkerton of A F Pinkerton & Partners			
WLPIC0283	CEMEX UK	23	Yes – WCAs will vary according to the type of site and more detail on these could be provided in a separate Consultation Protocol.	Hertfordshire County Council will consider all representations received on consultation areas, and will work with stakeholders throughout Plan-production to ensure the correct safeguarding policy is produced. The resultant safeguarding approach implemented by Hertfordshire County Council will be presented in a separate safeguarding policy in the Regulation 18 Draft WLP.
WLPIC0312	David L Walker Ltd (on behalf of Tarmac)	23	Yes -	Selection noted.
WLPIC0347	Iceni Projects (on behalf of BP Mitchell)	23	Yes -	Selection noted.
WLPIC0375	HCC Ecology	23	Yes -	Selection noted.
WLPIC0398	Biffa Waste Services	23	Yes – With the pressure on local authorities and developers to deliver new housing we are finding many of our sites are coming under pressure from new development on adjoining land. In some circumstances our ability to continue operating in accordance with our planning permissions and permits has been affected and in one extreme case we had to relocate a site in order to continue operating efficiently. Waste sites are strategic assets and should be protected and offered sufficient flexibility in their operation such that they can	Noted. Hertfordshire County Council recognises the importance of waste sites for achieving sustainable development, and the restrictive impact of encroaching non-compatible development. Hertfordshire County Council will work with industry and relevant planning authorities to ensure consultation on development which may threaten waste sites, and promote the emerging approach to safeguarding.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			continue to provide a vital service.	
WLPIC0403	Aylesbury Vale District Council	23	<p>Yes –</p> <ul style="list-style-type: none"> • WLP safeguards the existing waste site for specific type and level of development, then normal DM consultation arrangements on a planning application for non-waste development should be sufficient. • If the plan does not identify specific waste sites, then a consultation area approach would be sensible. • This should not be restricted to Hertfordshire, the area should reflect neighbouring areas if they could be affected by the change of land use. 	Hertfordshire County Council will promote consultation when development at Hertfordshire's boundaries may impact waste sites in neighbouring authorities, and will respectively work with the same authorities to promote consultation on development which may impact Hertfordshire's waste sites.
WLPIC0405	Firstplan (on behalf of Aggregate Industries UK)	23	<p>Yes –</p> <p>Safeguarding is not just a matter of ensuring that sites are not lost to other forms of development. New development in the surrounding area to existing waste sites also have the potential to impact on the operation of existing waste facilities. The best approach to safeguard waste sites is to (a) define and identify them (as has been referenced above) and (b) to ensure that new development does not prejudice their future operation. This can only realistically be achieved by including consultation areas around safeguarded sites. It is important to safeguard them and ensure that non-waste development doesn't have an impact on their operation.</p> <p>A policy would be required to trigger consultation with the county council for new development in areas near to existing waste facilities. Such consultation should not just be with regard to new built development. Other types of planning applications should also trigger consultation in appropriate circumstances. These would include: applications for prior approval</p>	Hertfordshire County Council recognises the importance of waste sites for achieving sustainable development, and the restrictive impact of encroaching non-compatible development. Hertfordshire County Council will work with industry and relevant planning authorities to ensure consultation on development which may threaten waste sites, and promote the emerging approach to safeguarding.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			for change of use to residential and applications for change of use to residential.	
WLPIC0436	HCC Waste Management and Environmental Resource Planning	23	Yes -	Selection noted.
WLPIC0481	Essex County Council	23	Yes – Consultation areas will be required to ensure that any safeguarding policy can be effectively implemented.	Comment noted.
WLPIC0520	Transition Town Letchworth	23	Yes -	Selection noted.

Table 7: Policies Used to Determine Applications – Issues 24-27

General Statement covering Issues 24 – 27

There was general support for the proposed Strategic and Development Management Policies with the majority of consultees agreeing that the suggested new policy headings contained the necessary topics related to waste planning.

The County Council proposes to address comments received regarding terminology through new policy wording, drafted in partnership with relevant stakeholders or government bodies. Additional requests for separate policies covering specialised issues, such as historic environment and AONBs, will be covered in more overarching policies to keep the Waste Local Plan streamlined.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
Issue 24				
Does the list of strategic policy headings cover all the topics that should be included in the Waste Local Plan?				
<ul style="list-style-type: none"> ○ Yes ○ The list is too extensive and could be streamlined ○ No – the list misses certain topics relevant to Hertfordshire 				
WLPIC0025	Royston Council	24	Yes – Educating people to be more responsible is needed.	Comment noted. WLP will use wording to encourage individuals to take more responsibility for their waste.
WLPIC0044	Hampshire County Council	24	Yes -	Selection noted.
WLPIC0065	Chilterns Conservation Board	24	No – • A strategic policy heading needs to be added about protecting the natural and historic environment. This would help deliver requirements for plans set out in NPPF para 113. • It would pave the way for general and more detailed policies on the conservation and enhancement of the Chilterns Area of Outstanding Natural Beauty, as well as other International and National Sites and Features of Importance	See General Statement. The NPPF will continue to be taken into account in decision making.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
WLPIC0088	North Hertfordshire District Council	24	Yes -	Selection noted.
WLPIC0113	Watford Borough Council	24	No – Reference should be made to 'energy from waste' and using waste as a resource - not just disposal.	This issue is proposed to be covered in the Development Management Policy wording. The Waste Hierarchy is fundamental to the WLP and will be made clear in the forefront of the plan. The suggested policy headings include 'Energy and Heat Recovery'.
WLPIC0140	Three Rivers District Council	24	Yes -	Selection noted.
WLPIC0168	Stevenage Borough Council	24	Yes -	Selection noted.
WLPIC0179	HCC Historic & Built Environment	24	No – Policies to conserve and enhance the historic environment should be included as per National Planning Policy for Waste, appendix b part e and the NPPF.	See General Statement.
WLPIC0215	Welwyn Hatfield District Council	24	No – <ul style="list-style-type: none"> • WLP should include site specific policies for different waste streams. • This would provide certainty for the volume of waste and the types of waste that need to be managed in the most appropriate locations. • Would help to minimise any potential impacts and deliver the support infrastructure. 	The WLP cannot be too prescriptive. Waste technology is changing all the time and the plan should not stifle innovation. If individual sites are identified they will be accompanied by a site specific planning brief and assessed against a series of criteria based policies. Advice would also be taken from the EA and others regarding the suitability of sites and certain waste processes.
WLPIC0254	Chiltern Society	24	No – It is unclear how the strategic policy headings relate to the development management policy headings. Is there proposed to be a hierarchy between them or would they be part of one list?	Strategic policies relate to the whole of the county and reflect the overall strategic vision for plan delivery. Development management policies are specifically related to the operation/siting issues which

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
				may need to be considered when looking at a specific application. It is proposed that there be a single WLP document with both strategic and DM policies, all of which would need to be applied.
WLPIC0284	CEMEX UK	24	Yes -	Selection noted.
WLPIC0313	David L Walker Ltd (on behalf of Tarmac)	24	No – <ul style="list-style-type: none"> • the strategic policy content needs to include safeguarding with requirements to consult with the MPA/WPA on any non-waste proposals within a 250m radius of a safeguarded facility. This is a strategic matter as well as a Development Control matter. • The provision for Waste Management of non-allocated sites and the inclusion of restrictive locational criteria in this regard including for both enclosed and open air waste management solutions (noted this policy criteria is included at proposal Policy 7 of the document) 	Comment noted, the safeguarding of some sites may be a strategic issue and may require some existing sites being designated as such.
WLPIC0348	Iceni Projects (on behalf of BP Mitchell)	24	Yes -	Selection noted.
WLPIC0376	HCC Ecology	24	Yes -	Selection noted.
WLPIC0396	Biffa Waste Services	24	No – <ul style="list-style-type: none"> • There will still be a need to provide landfill capacity in the County and the plan should therefore include a policy against which to assess new landfill applications. The plan could seek to identify potentially suitable sites from the emerging Minerals Plan. • Surrey County Council's emerging Waste Plan includes a good policy that we believe should also form part of the Hertfordshire Plan. 	Given the vulnerability of the ground water in Hertfordshire, it is unlikely that any area would be suitable for landfill other than inert material. It is proposed that the WLP will continue to have a landfill and land raise policy. Equally, the emerging Minerals Local Plan is being prepared to contain a policy regarding restoration with inert material.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
WLPIC0456	Historic England	24	<p>-</p> <ul style="list-style-type: none"> • On non-scheduled sites in areas of high archaeological potential, it should not be assumed that there is no remaining archaeology. Archaeological assessment and evaluation should be undertaken so that impacts can be assessed at the earliest opportunity. We would expect to see this reflected in any site specific policy as a criterion. 	Comment noted, any sites that are allocated in the WLP would need to be accompanied by a site specific planning brief, where such details could be included.
WLPIC0482	Essex County Council	24	<p>No –</p> <p>Strategic and development management policies could be re-defined such that ‘strategic’ policies are those that will be applied irrespective of place, and ‘development management’ policies are those which will be applied in a spatial context.</p> <p>It is considered that the approach to safeguarding is strategic, as is potentially the approach to waste management facilities in the green belt and climate change issues.</p> <p>Paragraph 11.1 notes that strategic policies "cover the type of applications which could be received by the county council with the purpose of these policies to maintain Hertfordshire characteristics" On this basis, the strategic policies could also include any number of policies which would impact on visual amenity and landscape such as: Policy 4, 7 Policy 12</p> <p>Policy 9 is currently listed under both strategic and development management policy headings.</p> <p>It is also noted that the strategic policy headings are broad and therefore it is not certain what is being</p>	Comment noted. The policies would be defined as such in the Regulation 18 Draft Waste Local Plan depending on the final content and issues covered within them. Some sites may be considered as strategic and may need to be safeguarded in line with this designation.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			proposed to be covered by each topic heading.	
WLPIC0521	Transition Town Letchworth	24	- This is not a question for public consultation	Comment noted.
WLPIC0541	HCC Highways	24	Yes – Strategic policies need to emphasise on proposals which utilise other forms of transport such as water or rail as well as the proximity principle so that facilities are well located in relation to the strategic road network unless it can be demonstrated that it can meet an identified local need.	Comment noted, the suggested policy headings include both strategic and development management policies to cover this issue.
WLPIC0547	Hertford Town Council	24	No – • For Waste transportation, maximum use should be made of the 'transport efficient' LEP growth corridors. • Transport of waste east west across the county should be minimised until the a414 can be improved.	Comment noted.
<p>Issue 25 Does the list of development management policy headings cover all the topics that should be included in the Waste Local Plan?</p> <ul style="list-style-type: none"> ○ Yes ○ The list is too extensive and could be streamlined ○ No – the list misses certain topics relevant to Hertfordshire 				
WLPIC0026	Royston Council	25	Yes -	Selection noted.
WLPIC0034	Herts and Middlesex Wildlife Trust	25	No – • Policies should contain a direct reference to net gain to biodiversity. • Both the current consultation on NPPF and the govt 25 year vision promotes measurable net gain as a key tenet of its approach to the consideration of biodiversity in planning. • Suggest new Biodiversity net gain and monitoring enforcement policy. • HMWT happy to provide text.	Comment noted. Policy wording will be drafted in consultation with Herts & Middlesex Wildlife Trust.

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WLPIC0045	Hampshire County Council	25	Yes -	Selection noted.
WLPIC0114	Watford Borough Council	25	No – <ul style="list-style-type: none"> • Fire prevention is missing, as this is a risk on waste sites. • Pollution of water tables is another missing topic 	The suggested policy headings include 'Soil, Air and Water'. In addition to this, the planning system must assume that other regulatory bodies (EA and HSE) will carry out their responsibilities in relation to these issues.
WLPIC0141	Three Rivers District Council	25	Yes -	Selection noted.
WLPIC0169	Stevenage Borough Council	25	Yes -	Selection noted.
WLPIC0180	HCC Historic & Built Environment	25	No – <ul style="list-style-type: none"> • There should be policies in the Waste Local Plan which protect and enhance the historic environment, as per the relevant parts of the NPPF and National Planning Policy for Waste. Currently there are not any. • Parts 11.5-11.7 on pages 49 and 50 of the consultation document need to be re-written. They confuse issues of air quality and noise with the historic environment and are therefore not clear or effective. 	See General Statement. Policy wording will be drafted in consultation with relevant stakeholders. The NPPF and NPPW will continue to be taken into account in decision making. It is proposed that this issue be covered in a criteria based policy 'Protection of Regional and Local Designated sites and areas'.
WLPIC0184	Dacorum Borough Council	25	No – <ul style="list-style-type: none"> • Waste Local Plan should deal with Household Waste Recycling Centres. • The HWRC in Hemel Hempstead is too small and should be extended or relocated. • WLP should propose to expand or relocate the site. 	The emerging WLP will be informed by the Local Authority Collected Waste Spatial Strategy and HWRC addendum report, both produced by the Waste Disposal Authority.
WLPIC0226	St Alban City and District Council	25	No – <ul style="list-style-type: none"> • Sites which are safeguarded in the Green Belt should be subject to a policy acknowledging their Green Belt location based on the NPPF. 	The policy wording relating to the safeguarding of existing facilities could make specific reference to sites in the Green Belt so that this is taken into

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			<ul style="list-style-type: none"> • There should certainly not be a specific proposal to remove such sites from the Green Belt via future LPA Local Plans. • This is the most appropriate way to ensure both safeguarding of the site against alternative, higher value, use pressures and management of Green Belt impacts from the continued or increased waste use. • The Roehyde site (Waste Site allocations 2014 – Inset Map 026 does not appear to be available for significant waste uses and the intended waste use proposal has never been clear. Should be removed from any allocation or safeguarding. 	account in any consultations on such sites.
WLPIC0227	St Alban City and District Council	25	<p>No –</p> <ul style="list-style-type: none"> • Plan should address HWRCs and the HCC Local Authority Collected Waste Spatial Strategy October 2016 / HCC Local Authority Waste Spatial Household Waste Recycling Centre Annex September 2017 • Clearer link from this through to the Waste Plan and the WDA/WPA position on expected population and household growth is needed. • It is important that HWRC facilities are maintained and improved in locations that serve all the major urban centres effectively. • Rationalisation of existing centres to ‘super sites’ not necessarily desirable in relation to the proximity principle and minimisation of length of vehicular journeys. • Reduced proximity to opportunities for disposal and recycling at HWRCs could increase fly tipping and should be considered with LPA in relation to emerging Local Plans. 	Comment noted, the WLP will be informed by the Local Authority Collected Waste Spatial Strategy and HWRC addendum report, both produced by the Waste Disposal Authority.
WLPIC0228	St Alban City and District Council	25	<p>No –</p> <ul style="list-style-type: none"> • Plan does not address WPA plans to provide for 	The WLP will be informed by the Local Authority Collected Waste Spatial Strategy

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			<p>energy from waste and how this will be dealt with in terms of the overall Waste Plan Strategy.</p> <ul style="list-style-type: none"> • Consideration of this issue would appear to necessitate consideration of a specific site allocation and / or provision of facilities on a cross boundary basis and cooperation with other WDAs / WPAs on a sub-regional basis. • As noted above there should also be implications for the forecasting of need for other types of facility (especially recycling). 	<p>and HWRC addendum report, both produced by the Waste Disposal Authority. The need to allocate specific sites was a question of this consultation and the representations have informed the options set out in a July 2018 HCC Growth, Infrastructure, Planning and Economy Panel Report. The waste capacity work and WLP will need to plan for all types of waste and different facilities to manage waste effectively and in line with the Waste Hierarchy.</p>
WLPIC0234	Savills on behalf of Thames Water Utilities Ltd	25	<p>No –</p> <ul style="list-style-type: none"> • Should include wastewater policy. • Recognise that wastewater flows will increase as a result of growth, and it is important to ensure that the necessary infrastructure to treat wastewater is put in place. • A policy should support the upgrade or development of such sites to accommodate growth and deliver environmental improvements 	<p>Comment noted. The suggested policy headings include 'waste prevention and reduction'. The current policy wording refers to Wastewater and is likely to continue in the new draft. The requirement for waste water facilities would be dealt with via a criteria-based Development Management policy. If there are specific strategic allocations needed for waste water treatment facilities, these should be highlighted by the utilities.</p>
WLPIC0240	Anglian Water Services Ltd	25	<p>No – See comments to Issue 21</p>	<p>Wastewater requirements are closely aligned to the proposals for residential development in district and borough Local Plans. Wastewater is a key infrastructural consideration in all the emerging Local Plans and as such, the need for additional facilities/capacity is being dealt with by the districts and boroughs with involvement of the relevant wastewater service provider. If there are specific strategic allocations</p>

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
				needed for waste water treatment facilities, these should be highlighted by the utilities.
WLPIC0255	Chiltern Society	25	No – • We would like to see a separate policy relating to the conservation and enhancement of the Chilterns AONB and its setting. Happy about Green Belt Policy.	See General Statement. Any new policy wording will be drafted in consultation with the Chilterns Conservation Board and Chiltern Society
WLPIC0285	CEMEX UK	25	Yes – • The list of policies seems to be comprehensive. • There could be some scope for streamlining but this will become more apparent once draft policies are available to comment on.	Comment noted.
WLPIC0314	David L Walker Ltd (on behalf of Tarmac)	25	- Policy 16 (Soil, Air and Water) may need splitting out as all three topics are potentially very complex in assessment terms. It is considered that Policy content in particular for water needs to be clear and precise and not merged in with other policy content.	See General Statement
WLPIC0349	Iceni Projects (on behalf of BP Mitchell)	25	Yes -	Selection noted.
WLPIC0377	HCC Ecology	25	Yes – The provisions for protected species may also need to be included within Policy 17	See General Statement. Policy wording will be drafted and consulted on in the Draft Waste Local Plan.
WLPIC0386	Canal & River Trust	25	- • Generic policy descriptions make it difficult to tell whether the list of policies cover all matters that should be included in the WLP. • We suggest that the Council should refer to the Policy Advice Note on Inland Waterways produced by the TCPA & British Waterways (our statutory predecessor), particularly the checklists in appendices 1 and 2, to identify the matters that the	Comment noted.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			Trust will want to see considered when developments are proposed within close proximity to our waterways.	
WLPIC0408	Aylesbury Vale District Council	25	Yes – AVDC support Policy Headings 10, 13, 15 and 19	Comment noted
WLPIC0422	Chilterns Conservation Board	25	No – <ul style="list-style-type: none"> • WLP should include a policy for the Chilterns Area of Outstanding Natural Beauty. • Development plans containing land in the AONB or its setting must have a policy about conserving and enhancing the AONB. • Policy would comply with the NPPF, The Countryside and Rights of Way Act 2000 Section 85, and The Chilterns AONB Management Plan. 	See General Statement. Any new policy wording will be drafted in consultation with the Chilterns Conservation Board and Chiltern Society.
WLPIC0453	Historic England	25	No – <ul style="list-style-type: none"> • Recommend that the development management section of the WLP contains a specific standalone policy and section of supporting text on the historic environment. • Policy should include reference to locally listed heritage assets, non-designated and undiscovered heritage assets as well as outlining information requirements that applicants should provide upon application. • The policy and supporting text should make appropriate reference to setting throughout. 	See General Statement. Any new policy wording will be drafted in consultation with Historic England.
WLPIC0483	Essex County Council	25	No – The list should include the authority's position on potential landfill mining.	Comment noted. The list of suggested new policies includes this issue.
WLPIC0487	HCC Natural Historic and Built Environment	25	- The explanatory text (paragraphs 11.8 – 11.11) and the policies need to make a clear distinction between matters relating to landscape, nature conservation, and historic environment, whilst they are	Comment noted. Explanatory text will be drafted to accurately reflect this.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			interconnected they are subject to separate national policy considerations.	
WLPIC0488	HCC Natural Historic and Built Environment	25	No – <ul style="list-style-type: none"> • Regarding landscape, the conservation and enhancement of character and visual amenity (locally distinct places) is relevant to all landscapes. • There is consideration for designated landscape such as valued landscapes, protection of AONBs. • SSSIs/Ancient Woodlands are biodiversity matters. • Other landscape matters include tranquillity. 	Comment noted. Explanatory text and policy wording will be drafted to reflect this and in consultation.
WLPIC0490	HCC Public Health	25	- <ul style="list-style-type: none"> • All site applications should, as a policy requirement, be expected to submit a Health Impact Assessment (HIA) to assess all potential impacts on health as a result of any proposed development. • The inclusion of such an approach would contribute to the Waste Local Plan being positively prepared. 	This topic will be covered by policy/ies that are drafted and included in the Regulation 18 Draft Waste Local Plan.
WLPIC0495	HCC Public Health	25	- <p>Recommend that all site applications should, as a policy requirement, be expected to submit an HIA to assess all potential impacts on health as a result of any proposed development. This would potentially fit as part of the proposed Policy 11 General Criteria for Assessing Waste Planning Applications</p>	The requirement to undertake an HIA may be appropriate in some circumstances and can be reflected in text and policy wording.
WLPIC0496	HCC Public Health	25	- <p>In paragraph 11.5, it would be beneficial to recognise that in addition to general amenity issues, members of the public may have health-related concerns which should be considered through Health Impact Assessment as part of the approaches outlined in 11.6 and 11.7.</p>	Comment noted. The explanatory text and policy wording will be drafted to reflect this and in consultation.
WLPIC0522	Transition Town Letchworth	25	- <p>This is not a question for public consultation</p>	Comment noted.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
WLPIC0535	Hunsdon Parish Council	25	<ul style="list-style-type: none"> - • Hunsdon PC supports commitments to secure the health and wellbeing of the people of Hertfordshire. • Planning applications for new and enlarged waste facilities (expanded by throughput and/or area of premises) should be subject to environmental impact appraisal. • Waste Policies should be strengthened, ensuring HGV movements do not impact on the safety of highway users and that movements are confined to highways of an appropriate standard for industrial activities. • Reliance on desk-based assessments (point 11.7) is inadequate. Site and locality visits should be the preferred assessment method. 	Comment noted. Planning applications would be expected to meet the requirements of legislation such as EIA. The waste policies will fully reflect the requirements that need to be met when submitting a planning application. Any assessments that may be required will be specified at application stage.
WLPIC0536	Hunsdon Parish Council	25	<ul style="list-style-type: none"> No – • Policies relating to fly tipping charges should be reviewed, ensuring there is the right balance to encourage waste reduction and recycling through charging. 	This is not within the remit of the WLP
WLPIC0538	Hunsdon Parish Council	25	<ul style="list-style-type: none"> No – <p>The draft Plan has no policies regarding the enforcement of breaches of planning permission relating to waste operations.</p>	Planning breaches are dealt with under specific sections of the Town and Country Planning Act, which give the county council certain powers to enforce. This is not a planning policy issue. However there may be some wording within the explanatory text to fully set out this issue.
WLPIC0542	HCC Highways	25	<ul style="list-style-type: none"> Yes – <p>The Highway Authority would fully support Policies relating to proposals that take account of minimising transport distances to the existing network of waste management facilities and the strategic road network.</p>	Comment noted and both explanatory text and policies will be drafted in consultation with the Highway Authority to fully reflect these requirements where appropriate.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			<p>In determining planning applications, considerations will be given to the suitability of the road network, extent to which access would require reliance on local roads, the rail network and other forms of transport links. All major development proposals should be accompanied by a Transport Assessment. Construction Management Plans will be required to ensure that developments provide for safe and legal delivery, collection, construction and servicing, including minimising the risk of collision with cyclists and pedestrians and set appropriate obligations to ensure compliance. Minimum safety requirements may be secured by legal agreements.</p> <p>The Highway authority would secure developer mitigation measures to limit the impacts of development on the transport network, and resist development where the residual cumulative impact of development is considered to be severe. It will also resist development that would either severely affect the rural or residential character of a road or other right of way, or which would severely affect safety on rural roads, local roads and rights of way especially for vulnerable road users.</p> <p>Developments with high number of HGV movements will create long-term highway maintenance expense to the County Council. Therefore, a S106 Agreement will be required to secure a Condition Survey in order to assess the condition of the highway within the vicinity of the site before the construction of the development and an updated version will be required at completion stage. Where the development as a</p>	

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			result of construction is likely to increase road degradation a highway bond should be secured via a Section 106 Agreement prior to commencement on site.	
Issue 26 Are the policy headings in Table 2 sufficient to meet any gaps in the policy areas identified? <ul style="list-style-type: none"> ○ Yes ○ The list is too extensive and could be streamlined ○ The list misses certain topics relevant to Hertfordshire 				
WLPIC0027	Royston Council	26	Yes -	Selection noted.
WLPIC0046	Hampshire County Council	26	Yes -	Selection noted.
WLPIC0115	Watford Borough Council	26	Yes – This seems to be the same as the question for Issue 24	Issue 26 is a list of suggested additional policy headings. Issue 24 was a question about Strategic Policies.
WLPIC0142	Three Rivers District Council	26	Yes -	Selection noted.
WLPIC0170	Stevenage Borough Council	26	Yes -	Selection noted.
WLPIC0181	HCC Historic & Built Environment	26	No – There should be policies in the Waste Local Plan which protect and enhance the historic environment, as per the relevant parts of the NPPF and National Planning Policy for Waste. Should these be included under sustainable development then this should be made clear.	Comment noted. The policy wording will be drafted in consultation with relevant stakeholders. The NPPF and NPPW will continue to be taken into account in decision making. It is proposed that this issue be covered in a criteria based policy 'Protection of Regional and Local Designated sites and areas'.
WLPIC0241	Anglian Water Services Ltd	26	Yes -	Selection noted.
WLPIC0286	CEMEX UK	26	Yes – • Support for policies which would allow for the	Comments noted.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			appropriate use of inert waste for the restoration of mineral sites and for the recycling of C, D&E waste at mineral workings. • It is recognised that there will be some cross-referencing between the Waste and Minerals Local Plans to address these issues.	
WLPIC0315	David L Walker Ltd (on behalf of Tarmac)	26	Yes -	Selection noted.
WLPIC0350	Iceni Projects (on behalf of BP Mitchell)	26	Yes -	Selection noted.
WLPIC0378	HCC Ecology	26	Yes – • Old landfill sites may have developed some ecological interest and this should be considered when determining planning applications for re-use of such sites for this purpose.	Where the proposed reuse of an old landfill site falls within the CCs remit this issue would be dealt with via the general criteria based policies.
WLPIC0484	Essex County Council	26	Too extensive – All proposed additions to the policy framework are supported although the relevance of a policy with regard to extensions is questioned.	Comments noted. Policy wording to be drafted and included within the Regulation 18 Draft Waste Local plan
WLPIC0523	Transition Town Letchworth	26	- This is not a question for public consultation	Comment noted.
Issue 27 Referring back to Chapter 6: Objectives, does the draft list of policy headings meet the objectives which will be included in the Waste Local Plan? <ul style="list-style-type: none"> ○ Yes ○ No 				
WLPIC0028	Royston Council	27	Yes -	Selection noted.
WLPIC0047	Hampshire County Council	27	Yes -	Selection noted.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
WLPIC0063	Chilterns Conservation Board	27	No – Add policy for conserving and enhancing the Chilterns Area of Outstanding Natural Beauty. It is important that waste facilities are distributed and sited in a way that is compatible with the nationally protected landscape of the Chilterns AONB.	See General Statement. Any new policy wording will be drafted in consultation with the Chilterns Conservation Board.
WLPIC0116	Watford Borough Council	27	- See the answer for Issue 4 above. This question seems to amount to the same as for Issue 4.	Issue 4 seeks to determine whether the Draft Objectives would endure the Draft Vision is achieved. Issue 27 seeks to determine whether the proposed list of Policies would help ensure the Objectives are met.
WLPIC0143	Three Rivers District Council	27	Yes -	Selection noted.
WLPIC0171	Stevenage Borough Council	27	Yes -	Selection noted.
WLPIC0182	HCC Historic & Built Environment	27	- Objective 2 includes the historic environment. Therefore policies conserving and enhancing the historic environment should be included.	Comment noted, the policy wording will be drafted in consultation with relevant stakeholders. The NPPF and NPPW will continue to be taken into account in decision making. It is proposed that this issue be covered in a criteria based policy 'Protection of Regional and Local Designated sites and areas'.
WLPIC0256	Chiltern Society	27	No – More prominence needs to be given to protection of the AONB, its setting and the Green Belt as set out above.	See General Statement. Any new policy wording will be drafted in consultation with the Chilterns Conservation Board and Chiltern Society
WLPIC0351	Iceni Projects (on behalf of BP Mitchell)	27	Yes -	Selection noted.
WLPIC0379	HCC Ecology	27	Yes -	Selection noted.
WLPIC0524	Transition Town	27	-	Comment noted.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
	Letchworth		This is not a question for public consultation	

Table 8: Sustainability Appraisal – Issue 28

General Statement covering Issue 28

Of the small number of comments submitted on this issue, there was overwhelming support that the headline objectives of the Sustainability Appraisal (SA) are appropriate as a framework to determine the sustainability of the Waste Local Plan.

There were a minor number of suggestions for changes to terminology within the objectives, and reference to additional sources of county council held data that should be used to support the SA overall. All comments received will be considered by the external consultants carrying out the Waste Local Plan SA to ensure that the SA and HRA process is carried out effectively and appropriately.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
Issue 28 Are the Objectives of the Sustainability Appraisal appropriate as a framework to determine the sustainability of the Waste Local Plan? <ul style="list-style-type: none"> ○ Yes ○ No 				
WLPIC0029	Royston Council	28	Yes -	Selection noted. Comments to be passed to the consultants responsible for undertaking the Sustainability Appraisal of the WLP review.
WLPIC0035	Chorleywood Parish Councillor	28	Yes -	Selection noted. Comments to be passed to the consultants responsible for undertaking the Sustainability Appraisal of the WLP review.
WLPIC0064	Chilterns Conservation Board	28	Yes -	Selection noted. Comments to be passed to the consultants responsible for undertaking the Sustainability Appraisal of the WLP review.
WLPIC0089	North Hertfordshire District Council	28	Yes -	Selection noted. Comments to be passed to the consultants responsible for undertaking the Sustainability Appraisal of

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
				the WLP review.
WLPIC0117	Watford Borough Council	28	Yes -	Selection noted. Comments to be passed to the consultants responsible for undertaking the Sustainability Appraisal of the WLP review.
WLPIC0144	Three Rivers District Council	28	Yes – Objectives of the SA are similar to the objectives included in the SA carried out for the Three Rivers adopted Core Strategy.	Selection noted. Comments to be passed to the consultants responsible for undertaking the Sustainability Appraisal of the WLP review.
WLPIC0172	Stevenage Borough Council	28	Yes -	Selection noted. Comments to be passed to the consultants responsible for undertaking the Sustainability Appraisal of the WLP review.
WLPIC0183	HCC Historic & Built Environment	28	Yes – The Natural, Historic & Built Environment Advisory Team supports part 8, Historic Environment. However this should read conserve and enhance the historic environment.	Selection noted. Comments to be passed to the consultants responsible for undertaking the Sustainability Appraisal of the WLP review.
WLPIC0257	Chiltern Society	28	Yes -	Selection noted. Comments to be passed to the consultants responsible for undertaking the Sustainability Appraisal of the WLP review.
WLPIC0352	Iceni Projects (on behalf of BP Mitchell)	28	Yes -	Selection noted. Comments to be passed to the consultants responsible for undertaking the Sustainability Appraisal of the WLP review.
WLPIC0380	HCC Ecology	28	Yes – If the WLP is expected to contribute positively to these, there will need to be some mechanism outlined whereby this can be achieved, otherwise it is wholly aspirational.	Selection noted. Comments to be passed to the consultants responsible for undertaking the Sustainability Appraisal of the WLP review.
WLPIC0407	Aylesbury Vale District Council	28	Yes – AVDC considers the SA Objectives to be thorough	Selection noted. Comments to be passed to the consultants responsible for

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			and appropriate.	undertaking the Sustainability Appraisal of the WLP review.
WLPIC0454	Historic England	28	<ul style="list-style-type: none"> - • Locational criteria site selection will include the potential effects on the significance of heritage assets, whether designated or not, including any contribution made by their setting. • We therefore advise that any appraisal work supporting site selection takes the historic environment into account, and all types of heritage assets should be considered. 	Selection noted. Comments to be passed to the consultants responsible for undertaking the Sustainability Appraisal of the WLP review.
WLPIC0458	Historic England	28	<ul style="list-style-type: none"> - • Pleased that the SA contains an objective which seeks to enhance and restore the landscapes and townscapes of Hertfordshire, including rural areas and open spaces. • HCC already has a series of Landscape Character Assessments which we would strongly suggest are drawn upon when considering the allocation of sites. • Advise that the SA and any subsequent studies in support of the WLP policies make use of Landscape Characterisation data held by the County Council. • Expect to see this resource indicated in the evidence base for the WLP and in the baseline evidence of the SA, as well as being referred to specifically within the forthcoming plan itself. 	Selection noted. Comments to be passed to the consultants responsible for undertaking the Sustainability Appraisal of the WLP review.
WLPIC0497	HCC Public Health	28	<ul style="list-style-type: none"> - • Support the Draft SA Objectives. • This, however, does not negate the need for proper Health Impact Assessment to be required and undertaken for all site proposals. 	Selection noted. Comments to be passed to the consultants responsible for undertaking the Sustainability Appraisal of the WLP review.
WLPIC0525	Transition Town Letchworth	28	<ul style="list-style-type: none"> - This is not a question for public consultation 	The planning authority is obligated to consult the Environment Agency, Natural

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
				England and Historic England on the content of the Sustainability Appraisal. Issue 28 was included to ensure a wider variety of consultees could have input into the Sustainability Appraisal.
WLPIC0544	Forestry Commission	28	Yes – The Forestry Commission has looked at the objectives in the Sustainability appraisal scoping report and though ancient woodland is mentioned (once) there is nothing that suggests the need for and an approach to assessment that has/will be done according to the Standing Advice.	Selection noted. Comments to be passed to the consultants responsible for undertaking the Sustainability Appraisal of the WLP review.

Table 9: Summary – Issue 29

General Statement covering Issue 29

Issue 29 was included to provide consultees with the opportunity to raise any matter they thought had not been covered by the rest of the consultation document.

A number of consultees used this opportunity to provide waste data sources and further information, either via guidance documents or specific site examples, which could support the development of the Waste Local Plan. Other consultees re-iterated their support for the emerging Plan, and requested additional information be provided in the form of topic papers as Plan production progresses.

The County Council has noted the guidance documents listed and will review them as policies and supporting text is drafted.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
Issue 29				
If you have any additional comments relevant to the development of the Waste Local Plan that are not covered by Issues 1-28, please provide them below.				
WLPIC0216	Welwyn Hatfield District Council	29	<ul style="list-style-type: none"> • Following Call for Sites there should be a further Regulation 18 stage of consultation prior to Reg 19 proposed submission document. 	Plan production is set out in the Minerals and Waste Development Scheme and includes a further Regulation 18 stage of consultation.
WLPIC0222	St Alban City and District Council	29	<ul style="list-style-type: none"> • The WLP should assume there will be continued reduction and reuse strategies which eliminate aspects of waste completely, not requiring special provision of land and facilities. • Not considering this could result in the over-provision of land and facilities – causing undesirable environment impacts. • The issue and implications for forecasting should be discussed in the consultation document. 	Improved performance for waste reduction and reuse are taken account of by other bodies when setting targets for other levels of the Waste Hierarchy. Waste production is forecast to increase but the emerging WLP will Plan to achieve what are considered aspirational waste management performances.

Comment ID	Organisation	Issue No.	Comment Summary	HCC response
			<ul style="list-style-type: none"> • One approach would be to address this issue through longer term, aspirational targets, that are then subject to frequent review. 	
WLPIC0316	David L Walker Ltd (on behalf of Tarmac)	29	Paragraph 3.25 - This paragraph makes reference to the rate of recovery within the waste hierarchy. The definition used in this paragraph is not consistent with the National Planning Policy for waste, which confirms that the term recovery can also include for where "waste can serve a useful purpose by replacing other materials that would otherwise have been used. A prime example of this is the use of certain materials in the restoration of a mineral working. This under certain circumstances is recognised by the EA as recovery and this needs to be reflected in this policy document	HCC agrees that re-wording of Paragraph 3.25 is required.
WLPIC0317	David L Walker Ltd (on behalf of Tarmac)	29	Paragraph 3.26 - whilst it is recognised that disposal is the least desirable technique to manage waste arisings it can provide opportunity for environmental improvement. Such an instance is in the use of materials in the restoration of minerals workings in which the disposal of, in particular, inert waste materials can play a fundamental role. It is considered that the plan could be worded more positively in this regard to reflect this sustainable relationship	HCC will consider rewording paragraph 3.26 addressing inert waste disposal. It should be noted that the WLP will continue to have a landfill and land raise policy. Equally, the draft MLP contains a policy regarding restoration with inert material.
WLPIC0318	David L Walker Ltd (on behalf of Tarmac)	29	Paragraph 4.3 - again the positive role that the management of inert waste arisings from the Greater London Area needs more emphasis as such materials enable the successful implementation of restoration schemes at mineral workings. The use of such materials in this regard is viewed as sustainable development a theme which should underpin all	The WLP will continue to have a landfill and land raise policy. Equally, the draft MLP contains a policy regarding restoration with inert material.

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			aspects of the emerging plan	
WLPIC0319	David L Walker Ltd (on behalf of Tarmac)	29	Paragraph 4.17 - the paragraph recognises the prospect for growth along railway corridors but does not mention the potential for the need to manage materials arising from HS2. Whilst it is acknowledged that the route of the asset is not in the county, its close proximity may mean some cross boundary effects that need consideration	HCC will address considerations for waste arising from HS2 within Chapter 4: Challenges Planning for Waste in Hertfordshire.
WLPIC0320	Cumbria County Council	29	With regard to the Duty to Cooperate, I am not aware of any strategic planning issues that Cumbria County Council would wish to raise.	Comment noted.
WLPIC0321	Chorleywood Parish Council	29	Chorleywood Parish council Planning committee considered the Waste Local Plan Initial Consultation and had no objection to the proposed documents.	Comment noted.
WLPIC0322	Little Hallingbury Parish Council	29	Little Hallingbury Parish Council had no comments on the Initial Consultation on Waste Local Plan.	Comment noted.
WLPIC0323	Great Hallingbury Parish Council	29	Great Hallingbury Parish Council had no comments on the Initial Consultation on Waste Local Plan.	Comment noted.
WLPIC0324	Aldenham Parish Council	29	Aldenham Parish Council met on 4th April and this is their response:- Members had no comments to make about this consultation.	Comment noted.
WLPIC0390	Biffa Waste Services	29	It is unrealistic to expect Hertfordshire to achieve net self-sufficiency. Paragraph 8.3 presents a more realistic approach with the East of England region planning for net self-sufficiency as a whole rather than individual authorities. London will never achieve net self-sufficiency and there will always be a need for the disposal of wastes that cannot be recycled, non-combustible wastes and	The Waste Planning Authorities within the East of England all agreed to plan for net self-sufficiency as individual authorities in order for the region to become net self-sufficient. It is acknowledged that waste will continue to be exported out of London, much of which will be transported to Hertfordshire regardless of the London Plan's

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			<p>EFW bypass wastes from the capital. These wastes need to be planned for and the joint planning for this between London and the East of England authority should form part of the duty to co-operate.</p> <p>We have no specific comments to offer on the capacity gap analysis at this stage in the plan process. The targets in general look realistic but challenging. Diversion of 90% of wastes from landfill by 2031 is only relevant to MSW and MSW-like I&C waste, i.e. recyclable and combustible materials, as per this target in EU CEP (and 90% could be possible, see Fig 18 in Biffa's Reality Gap report 2017). This figure is clearly not relevant to all waste given that Defra's statistics show that over 73% of inputs to landfill now in the UK are soils and "other wastes", i.e. non-recyclable and non-combustible waste which still needs landfill. We would draw your attention to the landfill chapter of the Reality Gap 2017 report and would suggest that this is a useful reference source in preparing the plan. The report can be accessed from our web site using the following link: https://www.biffa.co.uk/wp-content/uploads/2015/11/048944_BIFFA_Reality-Gap_2017Single-150817-2.pdf</p>	<p>commitment to plan for net self-sufficiency. Duty-to-Cooperate discussions between the North London Waste Plan and HCC will continue. While the emerging WLP is not required to directly plan for the quantity of waste imports forecast throughout the Plan period, the emerging WLP will take into account the forecasted quantities and form of London waste arisings. Comments on targets noted.</p>
WLPIC0399	North Herts District Council - Councillor	29	Endorses the responses submitted by Royston Town Council	Comment noted.
WLPIC0400	Hertfordshire County Council - Councillor	29	Endorses the responses submitted by Royston Town Council	Comment noted.
WLPIC0401	Aylesbury Vale District Council	29	Supportive of Paragraph 3.15 (Proximity Principle) because of the likely reduction in transport	Comment noted.

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			movements that could potentially be into neighbouring districts	
WLPIC0406	Aylesbury Vale District Council	29	<ul style="list-style-type: none"> Given para 11.8-11.11 of the WLP cover the Natural Environment it makes sense to extent 'net biodiversity gain' to cover the wider remit of 'net environmental gain' so there may be benefits to air quality, contamination, flooding, trees, landscape etc. Draft National Planning Policy Framework and the proposals for a mandatory net gain in biodiversity (Draft NPPF paras 172, 173) – highlighting WLP use of wording 'net gains where possible' for biodiversity. 	HCC will consider minor re-wording of 'net biodiversity gain' to 'net environmental gain', and the use of 'mandatory net gain in biodiversity' in line with the National Planning Policy Framework.
WLPIC0409	Northamptonshire County Council	29	The Plan should give greater consideration to radioactive waste and how the plan will address this waste stream.	Radioactive Waste will be considered under the coverage of Hazardous Waste.
WLPIC0420	Veolia Environmental Services	29	<p>Veolia has significant concerns regarding the approach taken to identifying the non-hazardous residual waste capacity gap as detailed in Table 37 of the Draft Waste Capacity Gap Report. The assumptions made with respect to Westmill Landfill are considered to be incorrect. The assumption in Table 37 that residual waste capacity will continue at 450,000 tpa until 2031 must be incorrect. After 2021 the only approved (not operational at today's date) non-hazardous waste treatment capacity will be from the ATT plant in Ratty's Lane.</p> <p>In addition it is considered that Table 37 needs further revision. It is considered that the High growth scenario is not the worst case scenario which would occur if recycling and composting continue at current rates.</p>	The Draft Waste Capacity Gap Report (2017) will be updated to incorporate up to date information, including changes to the planning permission of individual waste sites and the resultant capacity of Hertfordshire to manage certain waste streams.
WLPIC0423	HCC Waste Management and Environmental	29	If required, a Call for Sites should be undertaken in a sufficiently robust manner to enable the best available land to be brought forward	The potential options for a way forward for identifying sites during the WLP review are presented in a Growth, Infrastructure,

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	Resource Planning			Planning and Economy Cabinet Panel Report to be presented on 05 July 2018.
WLPIC0424	HCC Waste Management and Environmental Resource Planning	29	The WCAs have a legislative responsibility to provide a commercial waste collection service if any Hertfordshire business's waste if required it, and thereafter present it to the WDA. Recently, the WCAs have collected 18-19,000tpa commercial waste in addition to household collection services. This has been in excess of 30,000tpa previously.	Comment noted. Commercial waste collected by WCA is incorporated into the non-hazardous waste arising forecasts in the Draft Waste Capacity Report (2017).
WLPIC0433	HCC Waste Management and Environmental Resource Planning	29	<p>- The WLP should consider the composition of wastes to be managed beyond the current high-level household, commercial and industrial allocations and, in line with the LACW Spatial Strategy, identify capacity for the specific technologies required to manage arisings. For example, aligning projected dry recycling volumes with sites that are appropriate for development of Materials Recycling Facilities and/or Transfer Stations or organic waste processing capacity to meet the projected demand or aspirations for example, for increased food waste collection and treatment.</p> <p>However, it is recognised that the Circular Economy Package does not contain any significant measures to invest or support markets for recyclable materials. This means that achieving the new EU targets appears challenging and so the WPA should perhaps consider provision of capacity that "hopes for the best, but plans for the worst" being better to have sufficient capacity within the Waste Local Plan than not enough.</p>	The WLP will take account of the forecast composition of waste projected by the HCC Local Authority Collected Waste Spatial Strategy as the best data source for future LACW waste arisings. There is no such equivalent data source for non-LACW waste. As Commercial and Industrial waste forms such a significant part of the non-hazardous waste stream, this makes it very difficult to plan for a more exact breakdown of future waste streams.
WLPIC0437	HCC Waste Management and	29	Following the conclusion of the Development Control Committee on the application for extension of time at	The Draft Waste Capacity Gap Report (2017) will be updated to incorporate up to

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	Environmental Resource Planning		Westmill Landfill, the capacity section within the Draft Capacity Gap Report requires updating. Westmill landfill received approval for landfilling until 2023 and final capping is to occur by 2025. The operator of the landfill site at Westmill should provide an up to date void capacity assessment to inform the latest position on capacity as the WDA believes that, at existing input volumes, the site will be full prior to the permitted extension period to 2023. As a result, the residual capacity gap may increase further, highlighting an urgent need to identify and bring forward sites for the treatment of residual waste in Hertfordshire.	date information, including changes to the planning permission of individual waste sites and the resultant capacity of Hertfordshire to manage certain waste streams.
WLPIC0445	Environment Agency	29	Defra produces data on regional waste inputs. It may be useful to cross-reference with the WDI figures.	HCC will review and cross-reference regional waste input data and incorporate data from DEFRA into its Waste Capacity Report.
WLPIC0459	Historic England	29	In preparation of the forthcoming WLP we encourage you to draw on the knowledge of local conservation officers, the county archaeologist and local heritage groups.	HCC will continue to consult relevant bodies both internally and externally.
WLPIC0460	Essex County Council	29	The justification for reviewing the Waste Local Plan should make references to the likely future wording of the NPPF with regard to the need to review plans every five years.	The emerging Waste Local Plan will be prepared in accordance with national planning policy and it is noted that the revised NPPF is due to be published before the emerging WLP is adopted.
WLPIC0491	HCC Public Health	29	It would be helpful for a topic paper to be developed on health in order to provide the background information and context in support of this requirement	HCC will consider the production of a Public Health topic paper to support the Draft Plan stage of consultation.
WLPIC0527	North Mymms Parish Council	29	HCC must commit to educate, inform and encourage re-use, recycling and recovery where appropriate in order to reduce disposal to landfill or exportation of waste.	Hertfordshire County Council is both the Waste Planning Authority, and the Waste Disposal Authority. As the Waste Disposal Authority, Hertfordshire County Council is

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				a member of the Hertfordshire Waste Partnership which organises educational schemes and resources for Hertfordshire's businesses and residents about managing their waste sustainably. As the Waste Planning Authority, HCC produces the Waste Local Plan to manage land-use planning issues. Specific commitments to educational schemes outside of supporting the Hertfordshire Waste Partnership are considered inappropriate for the emerging WLP.
WLPIC0528	North Mymms Parish Council	29	HCC must commit to improving the opening hours of Household Recycling Centres in order to overcome/diminish Fly-Tipping.	This is not within the remit of the WLP.
WLPIC0530	North Mymms Parish Council	29	NMPC's point 3 [WLPIC528] needs to form part of the overall Policy as this is an increasing anti-social occurrence and has to be reduced by exemplary management supporting good policy.	Fly-tipping is the responsibility of District or Borough Councils and is not an issue of land-use covered by the WLP.
WLPIC0531	North Mymms Parish Council	29	<ul style="list-style-type: none"> • Demographic and Economic Growth Figures are surely only best estimates. • HCC to aim for Net Self-Sufficiency, minimal movement of Waste in or out of the County and improved awareness of the impacts everyone can make to ensure well-being improves and benefits are community wide. 	Waste forecasts are based on best estimates due to a lack of certainty of any growth related to waste-production. The emerging WLP cannot control commercial waste movements. The objective to achieve net self-sufficiency aims to reduce waste transportation into and out of the region by ensuring that the local waste planning authorities provide sufficient opportunities to manage waste produced locally.
WLPIC0539	Environment Agency	29	No Comments.	Comment noted.
WLPIC0543	Forestry	29	• Forestry Commission would expect that the	If required, site assessment criteria will be

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	Commission		assessment criteria take account of the recently amended Standing Advice for Ancient Woodland and Veteran Trees, (amended Jan 2018) as it relates to Ancient Woodland where necessary i.e. close proximity to proposed site.	produced by independent consultants and this will consider the impacts of sites on Ancient Woodland.
WLPIC0545	Forestry Commission	29	<ul style="list-style-type: none"> Attached a PDF map of Hertfordshire which has layers which are important for the Environment Agency (e.g. flood risk) Natural England as well as the Forestry Commission 	HCC uses the most up to date information on planning constraints and will continue to do so in any spatial analysis of policies/sites in the emerging WLP.
WLPIC0546	Hertford Town Council	29	<ul style="list-style-type: none"> Endorses the Waste Hierarchy Supports the WLP IC's consideration of Hertfordshire's character. 	Comment noted.
WLPIC0551	Hertford Town Council	29	<ul style="list-style-type: none"> Hertford Town Council encourages composting on its allotment sites and supports East Herts Council in its policy not to charge for the removal of green waste from domestic premises. 	The issue of charging for the removal of green waste is an issue for the District Council and will not be covered in the Waste Local Plan.