

## Appendix A

### Responses to the JWDPD Issues and Options Consultation.

ID	Full Name	Organisation Details	Number	Title	Comments	Response	Officer Recommendations
2	Mr Paul Waine	Waste Recycling Services Ltd	Question 13		Q13 1. Yes – we need additional hazardous waste facilities. Many wastes can no longer go to landfill because of hazardous waste regulations redefining them. Other wastes are being defined as hazardous such as end of life vehicles and waste electronics – we must recycle more and not rely on landfill. The cost of disposal has increased and is leading to potential investment for the City to capture the advantages of new technology and increase skilled employment. Plus the Port Waste Management Directive requires increasing capacity for hazardous and non-hazardous wastes that must be landed in European ports. 3 - Yes. We query the estimated figures in RSS and from EA – We are willing to support the Council directly and through joint working with trade associations and other waste management bodies to provide up to date information and establish more accurate estimates of hazardous waste arisings.	Support for option 3 noted. Willingness to support the council welcomed.	
3	Gill King	Programme Delivery Manager Hull Forward		Why Hull and East Riding are working together	Para 1.11 - suggest that some context is given around the 45% target referred to (the document later clarifies that this exceeds other more strategic targets)	Context is provided in section 7, page 25 of the issues and options document.	No changes to plan.
4	Gill King	Programme Delivery Manager Hull Forward	Question 2		Could add an objective around economic benefits/supporting the local economy - (a) encouraging/assisting existing businesses to secure economic benefits through advice on waste management, (b) supporting economic growth through new business opportunities arising from or related to waste management activities and environmental technologies/renewables agenda (as a key target growth sector for the plan area's economy).	This is also the kind of objective that the joint waste technical group has supported. An economic objective will be therefore be added in subsequent versions of the DPD.	To add an additional objective for the DPD around developing the local economy.

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5	Gill King	Programme Delivery Manager Hull Forward	Question 5		Query whether it is necessary to make the policy more locally specific. This section of the document should perhaps briefly review or comment on local capacity to clarify whether or not there are particular issues or features that require a localised approach.	The Core Policy needs to be locally specific in order to comply with National Policy in Planning Policy Statements 10 & 12.	No changes to the plan.
6	Gill King	Programme Delivery Manager Hull Forward	Question 3		Yes with option 1.2 offering an appropriate way forward though with a caveat. In certain circumstances moving up the hierarchy may not be possible, and in these cases applicants should be required to clearly substantiate their proposals.		
7	Gill King	Programme Delivery Manager Hull Forward	7	Joint Waste Management Strategy	Para 7.4 and 7.5 refer to specific targets (target % rates and timelines). It would be useful to pull these out earlier in the document as part of context-setting. Where % targets are specified their target dates should also be set out.	We will investigate ways of presenting targets and when they are to be achieved more clearly within future versions of the DPD.	We will investigate ways of presenting targets and when they are to be achieved more clearly within future versions of the DPD.
15	Mrs Sue Jolliffe		Question 1		Generally reasonable. The waste hierarchy is not correct as it says create electricity from waste- it should say energy. The planned incinerator is flawed in this respect, as it has no capability to use heat energy generated making it an inefficient energy source. New technologies such as Anaerobic Digestion are more efficient and are now the preferred option.	The line 'create energy for electricity' and the reference to burning in the waste hierarchy diagram on page 18 is an error and will be amended to reflect the fact that 'energy recovery' is second to the last option of 'disposal' in the waste hierarchy.  It is not the remit	The waste hierarchy diagram will be amended to reflect the fact that 'energy recovery' is second to the last option of 'disposal' in the waste hierarchy.

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						of the Waste DPD to reopen planning permission for an Energy from Waste Plant at Saltend.	
16	Mrs Sue Jolliffe		Question 2		Reduce waste at source i.e. persuade manufacturers to minimise waste in the materials they use (these should be from sustainable sources wherever possible), reduce waste from processes, and minimise waste sources passed on to the consumers e.g. packaging. This should be an easy to do as, in most cases, this will result in cost savings for manufacturers. In addition, larger corporations at least are viewing sustainability and carbon reduction very seriously as it affects shareholder investment and corporate image with customers i.e. retailers and /or the public.	We are producing a new 'education' policy for subsequent versions of the DPD which will encourage the reduction of waste, although the planning links for this aspect are quite weak.	Encourage the reduction of waste as part of the new 'education' policy for subsequent versions of the DPD.
17	Mrs Sue Jolliffe		Question 3		There is scope for being clearer what the targets and aims actually are so that there is NO ambiguity. The 45+ target is now out of date and no longer stretching - the best performing authorities are achieving over 50% recycling now and a few are achieving 55%	It is not within the remit of the Waste DPD to change the joint municipal waste management strategy which adopts sustainable waste management scenario based on 45%+ recycling and incineration (energy from waste).  The aims and objectives of the document were set out for consultation on	No changes to the plan.

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						<p>page 21 of the issues and options document. Targets were set out in the Joint Sustainable Management Strategy and National Waste Strategy sections of the document.</p>	
8	Gill King	Programme Delivery Manager Hull Forward	Question 7		<p>More detail should be provided on targets (% rates, timelines) for the different types of waste, the facilities planned (more precisely what and where), and the progress being made. A view should also be given on the adequacy of existing and planned facilities under the JSWMS and where the key gaps are.</p> <p>The JSWMS focuses on household and municipal waste - this section of the Joint Waste DPD should acknowledge that focus and signpost to where consideration is given to other waste streams, in particular from business and industry.</p>	<p>One of our current work streams is to look at the waste projections and current waste management capacity in the area in order to establish where the shortfalls in waste management capacity are.</p> <p>Information on other waste streams is included in the waste data section of the document. This section of the document outlines the content of 'Target 45+' the Councils' Joint Municipal Waste Management Strategy which</p>	<p>To outline where the shortfalls in waste management capacity are in future versions of the DPD.</p>

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						deals only with municipal waste arisings.	
9	Gill King	Programme Delivery Manager Hull Forward	Question 8		The targets should be reviewed in the Joint Waste DPD to establish whether or not they are appropriate for incorporation as part of monitoring of the DPD, or indeed whether or not it is timely to revise them in light of new circumstances and strategic requirements.	Noted.	To review targets in subsequent versions of the DPD to establish whether 'Target 45+' targets are still appropriate.
10	Gill King	Programme Delivery Manager Hull Forward	Question 10		Option 3 or 4 provide the best basis as they consider RSS revisions and Secretary of State proposed changes. The issue is whether or not the worse case scenario in terms of waste growth should be planned for to ensure there is capacity, or whether adopting the lower growth rate would give more incentive to encourage waste reduction measures. The basis of the two alternative growth projections is also unclear, for example whether they adequately take into consideration projected household and economic growth. More information is therefore needed to come to a better informed view.	Noted	We will provide further explanation of where the projections have come from in subsequent consultations for the DPD.
11	Gill King	Programme Delivery Manager Hull Forward	Question 11		Working with the volumes outlined in RSS (option 2) seems sensible given that these should be substantiated. The appendix however does not have much information for non-domestic and non-municipal waste streams; more work is needed to complete the data. The document does not go into much detail about what the Local Authorities can and will do to address commercial and industrial waste. Whilst municipal and domestic waste are under Council control, Local Authorities have a role to play in at least advising businesses on waste management, which can have financial benefits to their commercial operations.	Support for option 2 noted. Difficulties have been experienced in obtaining non-municipal waste data. We will continue to seek the most accurate data available from the Environment Agency and Yorkshire and Humber Assembly.	Will ensure best data available is used.
12	Gill King	Programme Delivery Manager Hull Forward	Question 12		Option 3, due to the significant development plans underway in Hull (Gateway plans are highlighted but there are also other major regeneration and construction programmes planned and underway - through Hull Forward Hull's Economic Development Company	Support for option 3 noted. Work is underway to ensure most	

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					(formerly Hull Citybuild URC), Building Schools for the Future, the NHS LIFT programme - and the upturn in investor confidence for commercial development in Hull and other urban centres across the plan area. Work needs to be done to establish figures, projections and appropriate targets (Appendix C incomplete due to absence of suitable information)..	appropriate figures are used.	
18	Mrs Sue Jolliffe		Question 4		- see Q3 above – waste minimisation at source	Response as per representation to question 3.	No changes to the plan.
19	Mrs Sue Jolliffe		Question 5		NO importation of waste	Both Hull and the East Riding export waste to be managed elsewhere, therefore we cannot guarantee not to import waste.  Ruling out any importation of waste could undermine efforts to manage waste on the principle of nearest appropriate location risking non-conformity with the Regional Spatial Strategy.	No changes to the plan.
20	Mrs Sue Jolliffe		Question 6		Option 1.3	Noted	Preference noted.
21	Mrs Sue Jolliffe		Question 7		Incinerator is unlikely to be running by 2010 realistically. Potential sites for waste control should be proposed	The adopted Joint Waste DPD will allocate a number of sites for a range of waste	No changes to the plan.

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						management uses/technologies.	
22	Mrs Sue Jolliffe		Question 8		Should be consistent . – are the targets correct?	The targets are correct.	No changes to the plan.
23	Mrs Sue Jolliffe		Question 9		DEFRA figures show a decline in waste – so why do the predictions here all show an increase?	***advice required from waste management colleagues***	
24	Mrs Sue Jolliffe		Question 10		1. Those in spatial strategy	Noted	Preference to use figures in RSS noted.
25	Mrs Sue Jolliffe		Question 11		1. Less that Spatial strategy because industry will embrace sustainability reduce waste at source and increase of recycling ( to reduce manufacturing costs)	Support for option 1 noted.	
26	Mrs Sue Jolliffe		Question 13		If the incinerator is built, where is the fly ash going?	Fly ash will be transported to the hazardous waste section of the Winterton landfill site.	
27	Mrs Sue Jolliffe		Question 14		Depends on the economics and safety ... it's a bit like radioactive waste ...is it best to spread around many sites all requiring security and controls or a few well controlled sites ( with the costs of transporting)?	It is likely that smaller specialist facilities will be required due to the large variety of hazardous waste types, often requiring specific treatment methods.	
28	Mrs Sue Jolliffe		Question 19		Confusing	Will try to ensure clarity in future questions.	
29	Mrs Sue Jolliffe		Question 20		Depends on the site – but preferable close to source	Noted.	

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30	Mrs Sue Jolliffe		Question 23		Option C	Support for Option C noted.	
31	Mrs Sue Jolliffe		Question 25		Brownfield – close to waste generation ( or waste process output usage)	Noted.	
32	Mrs Sue Jolliffe		Question 29		Yes – need consider noise, pollution and appearance of each site. It is very important that these are presented to local residents in an honest, fair and reasonable way.	Support for a tailored approach noted.	
33	Mrs Sue Jolliffe		Question 30		Option 1.1	Support for Option 1.1 noted.	
34	Mrs Sue Jolliffe		Question 32		Option 2.1	Support for Option 2.1 noted.	
35	Mrs Sue Jolliffe		Question 34		Option 3.1	Support for Option 3.1 noted.	
36	Mrs Sue Jolliffe		Question 36		Option 4.2 –in the light of recent news about the huge amount of species lost in the last 30 years due human activity, this has great importance	Support for Option 4.2 noted.	
37	Mrs Sue Jolliffe		Question 38		Option 5.1	Support for Option 5.1 noted.	
38	Mrs Sue Jolliffe		Question 38		Option 5.1		
39	Mrs Sue Jolliffe		Question 40		Option 6.3	Support for Option 6.3 noted.	
40	Mrs Sue Jolliffe		Question 42		Option 7.3 – but the planned Incinerator is already in a flood risk zone. We saw that it was virtually flooded and the hazardous waste if stored there would potentially have been leached away	Support for Option 7.3 noted.	
41	Mrs Sue Jolliffe		Question 44		Option 8.3	Support for Option 8.3 noted.	
42	Gill King	Programme Delivery Manager Hull Forward	Question 13		Option 3 - on the basis that RSS figures should be substantiated.	Support for option 3 noted.	
43	Gill King	Programme Delivery Manager Hull Forward	Question 14		There is little information given to explain what options there may be for dealing with hazardous waste streams in the future and, therefore, whether strategically there is a need to consider options for dealing with more of the area's hazardous waste within the plan area. More information should be provided about facilities at regional level and	Agreed. We will seek additional locational and waste type data from the	Obtain additional data if possible.

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					their capacity to come to an informed view.	Environment Agency and Yorkshire and Humber Assembly.	
44	Gill King	Programme Delivery Manager Hull Forward	Question 15		Again further information needs to be provided to come to an informed view.	Noted.	
45	Gill King	Programme Delivery Manager Hull Forward	Question 17		JWMS figures / targets and their basis need to be explained within this DPD, with any variations to strategic (RSS / national) targets highlighted. There is an argument for maintaining consistency with strategic targets (e.g.: RSS) but where locally agreed targets are more aspirational these should be retained to demonstrate the seriousness with which the two Local Authorities take the issue. Where more recent figures exist then JWMS targets should be reviewed to determine whether or not they remain appropriate.	Differences in figures will be clarified. Availability of waste data is a problem nationally. The most up to date / appropriate figures will be used.	Ensure the most up to date and appropriate figures are used.
46	Gill King	Programme Delivery Manager Hull Forward	Question 18		Work needs to be done to source and complete the data to enable proper consideration.	The availability of waste data is acknowledged nationally as being a problem. Efforts will be made to ensure best available data will be used.	
47	Gill King	Programme Delivery Manager Hull Forward	Question 19		It is essential to plan to provide facilities where possible. We cannot continue to rely on exporting waste out of the area, whether to landfill or other treatment sites.	Noted.	
48	Gill King	Programme Delivery Manager Hull Forward	Question 20		This depends on the nature of the employment area and how its ongoing development is being taken forward (managed through a development framework, or left to the market). Within underdeveloped/developing employment areas specifying sites can be advantageous to provide certainty but this approach may not be	Noted.	

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					necessary in all cases.		
49	Gill King	Programme Delivery Manager Hull Forward	Question 22		As a general comment, it would be useful to provide a plan showing the results of the Barton Willmore site assessment, employment land allocations and restrictions on location (e.g.: see Chap 11 & 12 re nature conservation), to assist consideration of sites. Account should be taken of the growth potential of the environmental technologies/renewables sector (a target sector for the sub-region, and a key focus for Hull Forward, Hull's Economic Development Company) and the potential synergies with waste management.	The site assessment document will be produced to accompany the preferred options document. This will show all sites considered.	Produce a site assessment document to include all sites being considered.
50	Gill King	Programme Delivery Manager Hull Forward	Question 23		Option C seems the most sensible given the nature and extent of the plan area.	Support for Option C noted.	
51	Gill King	Programme Delivery Manager Hull Forward	Question 27		Group A:  * 1st bullet add Target 45+ document  * 8th bullet - potential conflict with planned as well as existing development  * Add opportunities to promote growth in environmental technologies/renewables sector  * Add precautionary approach regarding protecting land for certain growth employment uses, housing, leisure etc (therefore relating to wider planning policy)	Criteria will be amended for the first three points. We need to consider how to balance protection of various land uses.	Amend criteria
52	Gill King	Programme Delivery Manager Hull Forward	Question 28		Might opportunities for on-site management be appropriate for Group A? On the basis that it in some cases may be better to process on-site where the end product may be close to markets for sale, or where lower volumes (of product or residual waste) requiring onward transport result.	Will consider moving to Group A.	Consider if on-site management should be moved to Group A.
53	Gill King	Programme Delivery Manager Hull Forward	Question 30		1.2 on the basis that this adopts a 'sequential test' type approach and consideration of need/demand, which may result in other environmental benefits such as through reduced transport emissions, and economic benefits for local areas, for example where proposals promote the environmental technologies/renewables sector.	Support for Option 1.2 noted.	

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54	Gill King	Programme Delivery Manager Hull Forward	Question 32		2.1 - this requires clear consideration of site suitability, which will include access, opportunities for co-location etc (this could be clarified in policy wording).	Support for Option 2.1 noted.	
55	Gill King	Programme Delivery Manager Hull Forward	Question 34		3.3 sounds the most reasonable. It is untenable to prevent any further landfill where there may still be capacity as we cannot rely on exporting residual waste to other areas. Robust supporting policies are however required to absolutely minimise the residual waste that can only be disposed of through landfill.	Support for Option 3.3 noted.	
56	Gill King	Programme Delivery Manager Hull Forward	Question 36		It is difficult to provide a fully informed view due to lack of information within the document. There is an argument for promoting 4.2 on the basis that prevention is better than cure, however the extent of these various site designations would need to be presented to ascertain whether or not their inclusion in policy would overly limit opportunities for appropriate waste management site allocations.	All sites will be included on a map at the preferred options stage.	
57	Gill King	Programme Delivery Manager Hull Forward	Question 38		5.2 - guidance could be developed to help achieve appropriate solutions.	Support for Option 5.2 noted.	
58	Gill King	Programme Delivery Manager Hull Forward	Question 41		Hybrid of 6.2 and 6.3 - require that rail and water are considered, and /or waste management close to the source/end market	Support for a hybrid form of 6.2 and 6.3 noted.	
59	Gill King	Programme Delivery Manager Hull Forward	Question 42		The document needs to explain in brief the flood risk categorisations. 7.1 would allow flexibility but should be supported with additional wording to require assessment of all other considerations pertinent to the facility proposed.	Support for Option 7.1 noted. Consideration will be given to extra text and explaining flood risk categories.	Consider additional text and explanation of flood risk categories.
60	Gill King	Programme Delivery Manager Hull Forward	Question 44		8.1 on the basis that this complies with the Environment Agency's proposed approach.	Support for Option 8.1 noted.	
61	Gill King	Programme Delivery Manager Hull Forward	Question 46		9.2 offers an appropriate balance.	Support for Option 9.2 noted.	

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62	Gill King	Programme Delivery Manager Hull Forward	Question 48		This approach is worth considering given that different waste streams have different characteristics. Options should be considered to determine how this would be achieved and what value this would add.	Noted.	
63	Gill King	Programme Delivery Manager Hull Forward	Question 50		Commercial alterations should be clarified - fit-out and refurbishment work should be subject to SWMPs but could perhaps be interpreted as 'commercial alterations'	Will check in recently passed legislation to see if this has now been addressed.	Check legislation.
64	Gill King	Programme Delivery Manager Hull Forward	Question 51		1.2 promotes good discipline and anticipates potential future regulation, but whilst financial savings may result for developers and contractors this may be considered burdensome for smaller projects and may be difficult to handle administratively. At this stage 1.3 seems a more pragmatic approach, however the rationale for the value threshold specified should be made clear to ensure it is appropriate.	Benefits of options 1.2 and 1.3 noted.	
65	Gill King	Programme Delivery Manager Hull Forward	Question 53		Yes, with a caveat that planning obligations should be negotiated in light of other planning obligations that developers may also be required to meet, and in view of the scale of the development and nature of the site which may involve abnormal development costs.	Noted. Caveat will be considered.	Consider caveat suggested.
128	Ian Smith	Regional Director (Planning and Development) English Heritage, Yorkshire Region	Question 1		We would broadly support the proposed Aims and Objectives for the Waste DPD, especially the need to ensure that the strategy is delivered in a manner which will safeguard the environmental assets of the area.	Support noted.	No change to the plan.
129	Ian Smith	Regional Director (Planning and Development) English Heritage, Yorkshire Region	Question 12		In relation to construction waste, given the embodied energy within existing buildings (in terms of the materials used for their construction, the energy that was involved in moving those materials to the site etc) coupled with the energy which would be used in the demolition of those buildings and the removal of the waste materials, the LDFs, as a whole, should encourage the reuse of existing buildings in preference to their demolition and the redevelopment of a cleared site. Under such an approach, the starting point for consideration of a proposal would be whether it would reuse or adapt an existing building. Where this was not practicable or sustainable, then the reuse of existing materials should be considered. Only at the	For future documents, we will clarify consideration should be given to re-use of buildings where applicable.	Ensure documents reflect the need to consider re-use of buildings where applicable.

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					end of this process, would a building proposing new materials be permitted.		
66	Gill King	Programme Delivery Manager Hull Forward	Question 54		The level of contributions seem reasonable in themselves.	Noted.	
67	Gill King	Programme Delivery Manager Hull Forward	Question 56		2.2 with amended wording - planning obligations should be 'negotiated' as opposed to 'attached' with the threshold being a minimum value (and subject to justification of this value per our comment against Q.51).	Support for Option 2.2 noted. Amended wording will be considered.	Consider amended wording.
68	Gill King	Programme Delivery Manager Hull Forward	Question 61		JWDPD indicators should represent all measures set at strategic level and so should include all National Waste Strategy indicators and the RSS measure suggested in 14.6. For completeness the document should clarify what measures/targets apply to waste not under the Local Authority remit that are being monitored by others (e.g.: EA indicators for commercial & industrial waste). Measures/targets for agricultural and hazardous waste should also be clarified. This provides a fuller picture and also relates to the information-giving role that Local Authorities have with businesses and industry.	Will consider the suitability of additional indicators.	Consider the suitability of additional indicators.
69	Mr Paul Waine	Waste Recycling Services Ltd	Question 14		Q14 Yes – we should continue to develop facilities in Hull area. See response to Q13 above. The opportunity exists for partnership with Councils and waste contractors to develop recycling and recovery and provide employment opportunities.	Response noted.	
70	Mr Paul Waine	Waste Recycling Services Ltd	Question 20		Q20 Suggest a mixture of both. Preferable to identify sites where waste uses have a logical justification and the site owners/operators can invest in them, but will also need to allow for further sites especially later in the plan period.	Noted.	
71	Mr Paul Waine	Waste Recycling Services Ltd		Hazardous Waste	Para 8.16 The document also needs to refer to treatment, disposal and recovery facilities. The Site references are incomplete and therefore unhelpful. The wording is too limited and needs to be expanded to refer to growing volume of hazardous waste e.g. fluorescent light bulbs, televisions, batteries and used aerosols. The wording acknowledges the increased need to address the growing range of hazardous waste – but it does not give enough information to address material streams such as oil (identified by Defra as a priority waste stream).	The description of hazardous waste will be refined. References to specific facilities will be removed and the principles of nearest appropriate location explained.	Review description and clarify shipping and port waste.

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					Para 8.18 Although the volume of hazardous waste is relatively small compared to MSW and industrial waste, it is growing and it is desirable through the proximity principle to both collect and treat waste locally to reduce waste miles travelled. The area is too dependant on the existing site at Winterton and needs to be more self-reliant, particularly as many hazardous waste streams cannot now be disposed of at landfill. The port waste management directive requires ships to dispose of waste in port and avoid it being disposed of at sea. Shipping and port waste arisings are also increasing and this is important to support the shipping industry as a key element of the area's economy. The technology now exists to also recycle some hazardous wastes and this has the additional benefit of employment potential. There are now opportunities for treatment which reflect the Government's priorities of the waste hierarchy as recommended in PPS10.	We will seek clarification on shipping and port waste.	
72	Mr Paul Waine	Waste Recycling Services Ltd	Question 21		Q21 Yes - See site identified on separate bid form.	Bid form received.	
73	Mr Paul Waine	Waste Recycling Services Ltd	Question 42		Q42 There is already a concentration of waste management sites and uses in the River Hull corridor which falls within zone 3a, (as does most of Hull). Therefore it is unrealistic to exclude some hazardous waste from zone 3a as it can be stored in a manner which poses even less risk than many of the non-hazardous wastes which would be allowed under Option 7.2. For example waste oils are stored in tanks; dry wastes can be stored in containers and not stored in the open or on the ground. We recommend therefore that Option 7.2 is amended to allow the storage of hazardous waste even in zone 3a iii, subject to a site and materials specific FRA which demonstrates the site flooding potential, and the physical and management proposals to make the use acceptable on that site. To not allow hazardous materials to be stored in the industrial heart of the city which is already also used for waste management purposes would only lead to its transportation within or outside the city, put pressure on land in more suburban areas and reduce the use of the river to transport materials. As the text in 12.18 says, there are 'sustainability benefits which could outweigh risks posed by flooding'. Options 7.1 and 7.3 are unrealistic and over-simplify what is a more complex situation. In this context it should be noted that some processing activities are General Industrial uses that may not need	Suggested amendment will be considered.	Consider amending Option 7.2 to make it more workable.

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					planning permission. If the waste management policy were too restrictive, it would deter recycling and recovery, add to the costs of industry in the Hull area, deter investment in materials recovery and inhibit employment potential and research and development in the city.		
74	Ms Jacqueline Gombault	Councillor Brandesburton Parish Council	Question 1		Yes	Support noted.	No changes to the plan.
75	Ms Jacqueline Gombault	Councillor Brandesburton Parish Council	Question 2		To ensure appropriate collection facilities and services are made available.	The strategy for collection services is covered by the Joint Municipal Waste Management Strategy. The first objective of the issues and options document aims to provide recycling facilities in new developments.	No change to the plan.
76	Ms Jacqueline Gombault	Councillor Brandesburton Parish Council	Question 3		Yes		
77	Ms Jacqueline Gombault	Councillor Brandesburton Parish Council	Question 6		1.3	Noted	Preference noted.
78	Ms Jacqueline Gombault	Councillor Brandesburton Parish Council	Question 10		4.	Noted	Support for a waste growth figure of 4% and 45% recycling noted.
79	Ms Jacqueline Gombault	Councillor Brandesburton Parish Council	Question 11		2	Support for Option 2 noted.	
80	Ms Jacqueline Gombault	Councillor Brandesburton Parish Council	Question 12		3	Support for option 3 noted.	

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81	Ms Jacqueline Gombault	Councillor Brandesburton Parish Council	Question 13		2	Support for option 2 noted.	
82	Ms Jacqueline Gombault	Councillor Brandesburton Parish Council	Question 14		Continue sending outside	Response noted.	
83	Ms Jacqueline Gombault	Councillor Brandesburton Parish Council	Question 15		2	Support for option 2 noted.	
84	Ms Jacqueline Gombault	Councillor Brandesburton Parish Council	Question 20		The latter	Noted.	
85	Ms Jacqueline Gombault	Councillor Brandesburton Parish Council	Question 25		Near as possible to major generators of waste	Noted.	
86	Ms Jacqueline Gombault	Councillor Brandesburton Parish Council	Question 27		Yes, but add potential toxic emissions to air/land. To group A.	This is dealt with through Environmental Permits.	
87	Ms Jacqueline Gombault	Councillor Brandesburton Parish Council	Question 28		No, move 1, 3, 4, from group B to grp A	Suggestion of moving Nos 1, 3 and 4 to Group A noted and will be considered.	
88	Ms Jacqueline Gombault	Councillor Brandesburton Parish Council	Question 30		1.2	Support for Option 1.2 noted.	
89	Ms Jacqueline Gombault	Councillor Brandesburton Parish Council	Question 32		2.2	Support for Option 2.2 noted.	
90	Ms Jacqueline Gombault	Councillor Brandesburton Parish Council	Question 34		3.3	Support for Option 3.3 noted.	
91	Ms Jacqueline Gombault	Councillor Brandesburton Parish Council	Question 36		4.2	Support for Option 4.2 noted.	

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92	Ms Jacqueline Gombault	Councillor Brandesburton Parish Council	Question 38		5.1	Support for Option 5.1 noted.	
93	Ms Jacqueline Gombault	Councillor Brandesburton Parish Council	Question 40		6.3	Support for Option 6.3 noted.	
94	Ms Jacqueline Gombault	Councillor Brandesburton Parish Council	Question 42		7.2	Support for Option 7.2 noted.	
95	Ms Jacqueline Gombault	Councillor Brandesburton Parish Council	Question 44		Accepting that drinking water quality is paramount, we place our trust in the Environment Agency's policy, therefore 8.1	Support for Option 8.1 noted.	
96	Ms Jacqueline Gombault	Councillor Brandesburton Parish Council	Question 46		9.1	Support for Option 9.1 noted.	
97	Ms Jacqueline Gombault	Councillor Brandesburton Parish Council	Question 51		1.3. However believe a shorter doc should be associated with projects under £300K regardless, with minimum of bureaucracy but making some compliance with a waste management obligation.	Support for Option 1.3 and suggestion of simpler version for smaller projects noted.	
98	Ms Jacqueline Gombault	Councillor Brandesburton Parish Council	Question 56		2.3	Support for Option 2.3 noted.	
99	Ms Jacqueline Gombault	Councillor Brandesburton Parish Council	Question 52		There is little point in obtaining a commitment from an applicant/developer without having the means of monitoring SWMP's and enforcing them. There is already a lack of capability to do this for normal planning applications. Even more important if by making a statement on the plan, it sways a favourable planning decision.	Agree that lack of resources can be a problem in monitoring, however subsequent to the Issues and Options paper, SWMPs have become a legal requirement in some cases.	

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100	Ms Jacqueline Gombault	Councillor Brandesburton Parish Council	Question 61		Yes. 1, 3, 4 and 6	Noted.	
101	Mr Graham White	Unity in Community		European Legislation	<p>KuHCC and ERYC should take positive steps to engage with the 3rd sector involved with reuse. Whilst emphasised by EU and National legislation, and the opportunity exists to develop this capacity locally, there does not appear to be any emphasis on developing this capacity.</p> <p>Real Aid (ERYC) and ReRun / EBF (plus others) are engaged in this work.</p> <p>The council can support this through Reuse credits and recognising the social end economic impact this work has for people on low income.</p> <p>An extension of this is the development on 3rd sector recycling and reuse capacity, including glass recycling, wood recycling and anaerobic digestion of food waste. The 3rd sector has the operational management capacity to develop these operations - but lacks the capital infrastructure available to the private and public sectors.</p>	<p>Agree that the 3rd sector reuse and recycling capacity needs looking into as part of the Waste DPD.</p> <p>We will try to arrange a meeting with these organisations to discuss how the Waste DPD can assist in realising 3rd sector potential.</p>	To investigate how the Waste DPD can assist in realising 3rd sector potential.
102	Carole Lynn		Table 7.1	JSWMS Facility Requirements	<p>As an East Riding councillor for South-West Holderness ward, although I am writing this in my private capacity, I was very involved in the planning application for the incinerator at Saltend. This document assumes that the incinerator will be operational by the time that the strategy comes into force but, given the withdrawal of the PPC permit, I think that timetable must be in doubt assuming that the incinerator is built at all.</p> <p>The permit was withdrawn because the carbon footprint had not been adequately assessed and this aspect is one that has come very much to the fore recently.</p>	We will make it clear in subsequent versions of the DPD that an environmental permit is required in order to implement the planning consent for the incinerator at Saltend.	It will be made it clear in subsequent versions of the DPD that an environmental permit is required in order to implement the planning consent for the incinerator at Saltend.
103	Carole Lynn		Question 23		The inference must be that the carbon cost of transporting waste must be a consideration and hence dispersed, localised sites must be looked at seriously. I recognise the difficulties of obtaining planning permission for waste sites and I think that would have to be balanced off against the other considerations. Small amounts of	Noted.	

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					hazardous wastes may have to be transported some distance for disposal but other wastes should be disposed of as near to the source as possible not in one centralised facility.		
104	Carole Lynn		Question 18		One point of contention in dealing with the incinerator was the assumption about the rise in waste overall. As I understand it from the DEFRA website nationally all waste and household waste decreased slightly last year. I think it is quite likely that now people are much more aware of waste, for example by supermarkets not automatically handing out plastic bags which raises awareness, this trend will continue. I think that the figures for Hull and the East Riding were probably distorted by the amount of waste generated by the flooding in June 2007. If that is correct it seems strange to have a strategy that assumes increases in household waste.	The most up to date figures available were used. Although residual waste may reduce, arisings are, and are forecast to continue rising.	
105	Carole Lynn		11	Site Assessment Criteria	The flooding last June should also have concentrated minds on the dangers of locating waste facilities in flood-prone areas. We have seen what happens on the Humber foreshore when old waste tips are suddenly exposed to the action of the tides by erosion. Surely we can learn from what happened in 2007 and not repeat mistakes made by previous generations.	Flooding and flood risk is one of the site assessment criteria.	
106	Stephen Noreikos		2	Consultation	Even though we read  2.1 The Planning and Compulsory Purchase Act 2004 places significant emphasis on the requirement to consult widely on all planning documents. one does wonder what is the point of this document. There is a strong scent of open stable door about it, when it baldly admits 3.3 Relevant European legislation for the production of the JWDPD includes; the European Waste Framework Directive which informs member states of the basic principles that should be followed in waste management, although not all types of waste are covered. This legislation promotes reduction, reuse and recycling in preference to the less sustainable methods of incineration, (either with or without energy recovery), and landfill	All of the options presented comply with European policy. The issues and options consultation is intended to be very open so that the public can have their say on the Waste DPD from the beginning of its development.	No change to the plan.
107	Stephen Noreikos		Table 7.1	JSWMS Facility Requirements	But the two Councils have signed a twenty-five year contract and granted planning permission for a waste burner. If this proposed incinerator goes ahead, recycling will in effect be capped. In view of the fact that the pollution prevention permit for this development has been revoked, would it not be appropriate, given the "Relevant	Recycling will not be capped. The Joint Sustainable Waste Management	Subsequent versions of the DPD will make it clear that for planning consent for the

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					<p>European legislation” to renegotiate the contract with WRG?  Moreover, the Site Assessment Criteria in §11 would appear to rule out the construction of an incinerator at Saltend.</p>	<p>Strategy is clear that there is a target to achieve 45% recycling and composting of municipal waste by 2010, then go beyond this.</p> <p>Subsequent versions of the DPD will make it clear that for planning consent for the incinerator at Saltend to be implemented, it will need an environmental permit.</p> <p>***Input on waste management contract side of things required from waste management colleagues**</p>	<p>incinerator at Saltend to be implemented, it will need an environmental permit.</p>
108	Stephen Noreikos			National Legislation	<p>Section 3.8 notes that</p> <p>Higher national targets have been set for recycling, composting and recovery of household and municipal waste, and therefore, as has previously been pointed out to both Councils, the “45+” target adopted will be too low before the end of the planning period.</p>	<p>It is not within the remit of the Waste DPD to change Target 45+, the joint municipal waste management strategy which adopts sustainable waste management</p>	<p>No change to the plan.</p>

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						<p>scenario based on 45%+ recycling by 2010 and incineration (energy from waste).</p> <p>It is likely that the Joint Municipal Waste Management Strategy will have been reviewed several times before the end of the Joint Waste DPD plan period which stretches to 2026. Therefore the targets may change, however Target 45+ aims to go beyond the 45% target once it has been reached so this provides the flexibility to further increase recycling rates.</p>	
109	Stephen Noreikos		Question 1		In my opinion Target 45+ is lacking in ambition and proper commitment to waste reduction and recycling. otherwise, yes, the objectives are reasonable.	It is not the remit of the Waste DPD to change the content of Target 45+, the Joint Waste Management Strategy. Support noted.	No change to the plan.

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110	Stephen Noreikos		Question 2		Yes, local industries should be brought on board in an effort to reduce packaging or to increase the use of more easily recyclable packaging.	This is something which is being tackled nationally through National Waste Strategy 2007. A new 'education' policy which is being developed for subsequent versions of the DPD may also be able to encourage this.	To look at whether local industries could be involved through developing the new waste 'education' policy for subsequent versions of the DPD.
111	Stephen Noreikos		Question 3		Core policies should be stringent and not allow room for evasion.	Noted. It is not the intention to evade the Core Policy, once adopted.	No changes to plan.
112	Stephen Noreikos		Question 5		Core policies should incorporate — and if necessary repeat — national policies.	The DPD needs to be consistent with National Policy and not repeat it. The DPD will not be found to be 'sound' at public examination if it simply repeats national policies.	No changes to the plan.
113	Stephen Noreikos		Question 7		No, there should be some advance indication of possible sites.	Site selection criteria have been included within this document for consultation. Potential sites for waste management use will be presented in subsequent	Present potential sites for waste management use in subsequent consultations for the DPD.

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						consultations on the DPD.	
114	Stephen Noreikos		Question 8		Strategy should allow for flexibility to revise target upwards and meet more stringent standards.	National Planning Policy Statement 10 requires us to review the DPD at least every 5 years or sooner if there are signs of under provision of waste management capacity or over provision of disposal options where these would undermine movement up the waste hierarchy- review of the appropriate waste.	National Planning Policy Statement 10 requires us to review the DPD at least every 5 years.
115	Stephen Noreikos		Question 10		One of the tables within Appendix C considers different figures for waste growth. We need to decide which to use	It is unclear from this response which municipal waste projection figures are supported.	No changes to the plan.
116	Stephen Noreikos		Question 11		There is a risk of "Predict and Provide". Figures used should incorporate and encourage increasing reduction of waste.	Data used is primarily from the Regional Spatial Strategy. Policies supporting the reduction of waste are provided elsewhere in the document.	Ensure data used is inline with the Regional Spatial Strategy, and that policies reinforce the need to reduce waste
117	Stephen Noreikos		Question 13		It is, to say the least, surprising that no mention is made of the hazardous ash resulting from waste incineration. Provision should be	The permission for the incinerator at	Ensure incineration waste disposal

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					made for this.	Saltend identified the hazardous waste section of the Winterton landfill site as the disposal location. Future documents will be amended to show where incineration waste will be disposed of.	location is included where possible.
118	Stephen Noreikos		Question 20		Specific sites should be identified and confirmed through a public consultation process.	Noted.	
119	Stephen Noreikos		Question 23		Option C.	Support for Option C noted.	
120	Stephen Noreikos		Question 30		Option 1.1.	Support for Option 1.1 noted.	
121	Stephen Noreikos		Question 32		Option 2.1.	Support for Option 2.1 noted.	
122	Stephen Noreikos		Question 34		Option 3.1 We will eventually run out of all possible sites for landfill nation-wide: we might as well get used to it now.	Support for Option 3.1 noted.	
123	Stephen Noreikos		Question 36		Option 4.2.	Support for Option 4.2 noted.	
124	Stephen Noreikos		Question 38		Option 5.1.	Support for Option 5.1 noted.	
125	Stephen Noreikos		Question 40		Option 6.3.	Support for Option 6.3 noted.	
126	Stephen Noreikos		Question 42		This cannot be answered as long as the problem of hazardous ash from incineration remains to be addressed.	Noted.	
127	Stephen Noreikos		Question 44		Option 8.3.	Support for Option 8.3 noted.	
130	Ian Smith	Regional Director	Question 26		In terms of our area of concern, we consider that Group A sets out the principal environmental considerations which the Councils will	Criteria to be amended to take	Amend criteria.

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		(Planning and Development) English Heritage, Yorkshire Region			need to take into account in determining planning applications for new waste management facilities and reflects the advice provided in Annex E of PPS10. However, when considering proposed waste developments, in line with the guidance in PPGs15 and 16, account should also be taken of the effects which these developments might have upon the setting of these assets. [Appendix F, incidentally, does not detail the heritage sites].	account of the setting of these assets.	
131	Ian Smith	Regional Director (Planning and Development) English Heritage, Yorkshire Region	Question 28		<p>Although, in most cases, non-designated archaeological sites will carry less weight in terms of deciding which sites are suitable for waste management facilities than those which are Scheduled, it should be borne in mind that the Schedule of Monuments compiled by the Secretary of State represents only a selective example of nationally-important archaeological remains in the area. Consequently, there may well be other sites in the area covered by this DPD which, although not Scheduled, are of national importance. As PPG16 makes clear, there is a similar presumption in favour of the preservation of any archaeological site of national importance, whether Scheduled or not.</p> <p>It is unclear why reference is made to AONBs given that there are none designated in the East Riding or Hull.</p>	English Heritage to be contacted regarding an appropriate list of sites.	Contact English Heritage to obtain an appropriate list of sites.
132	Ian Smith	Regional Director (Planning and Development) English Heritage, Yorkshire Region	Question 38		<p>There appears to some overlap between the areas which might be covered by Policy W5 and other suggested policies. For example, the Heritage Coast is intended to be covered by both Policy W4 and W5; it is suggested that Archaeology is included in both Policies W5 and W9. To assist users of the document (and to avoid confusion between statutory and non-statutory designations), it might be preferable to have three policies - one covering landscapes, one archaeology, and one the other elements of the historic environment.</p> <p>The assets which should be included within the policy for the historic environment should include all those set out in the fifth bullet-point of Group A in Paragraph 11.1.</p> <p>In line with the advice in PPG15, the Policy should seek to safeguard not only upon the asset itself, but also its setting</p> <p>In terms of the heritage of the Plan area, we would favour Option 5.1, since for most aspects of the historic environment, it mote closely</p>	There is a need to reconsider the policy to ensure it doesn't overlap and doesn't just repeat national policy.	Reconsider policy

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					reflects the advice contained in national policy guidance. In terms of the landscapes of the Plan area it might be more appropriate to pursue Option 5.2.		
133	Ian Smith	Regional Director (Planning and Development) English Heritage, Yorkshire Region	Question 46		Option 9.2 most closely reflects the advice contained in PPG16 – i.e. that there is a presumption in favour of all nationally-important archaeological remains (whether Scheduled or not). In the case of archaeological remains that are not of national importance, there is a need to reconcile the relative importance of the remains with the need for the development. PPG16 emphasises the importance of archaeology and urges that archaeological remains are not needlessly destroyed. Wherever possible, developments should be located or designed to avoid archaeological remains to ensure that these remain preserved in situ. Where in situ preservation is not justified, the developer will be required to make appropriate and satisfactory provision for the excavation and recording of the remains before planning permission is granted.	Noted. Need to consider PPG 16.	Consider PPG 16
134	Ian Smith	Regional Director (Planning and Development) English Heritage, Yorkshire Region	Question 48		In terms of assessing the appropriateness of proposed waste management facilities, in the case of the historic environment, the considerations are broadly similar irrespective of which waste stream is being considered. Consequently, we would favour a set of broad policies covering the various aspects of the historic environment rather than a separate policy for each waste stream.	Noted.	Consider policies for aspects of historic environment.
171	Sam Kipling	Planning Liaison Officer Environment Agency	Question 1		We welcome the objectives, particularly the commitment to sustainability, driving waste up the hierarchy and treating waste as a resource. We find all the objectives of the document to be a good fit with our own Creating a Better Place strategy 2006–2011.	Support noted	No changes to the plan.
172	Sam Kipling	Planning Liaison Officer Environment Agency	Question 2		In addition to the stated objectives we would support a broad commitment to tackling climate change.	Agree that more information on how the DPD can tackle climate change should be included in the document. There will be an additional section in future versions	For an additional section to be written into future versions of the DPD to expand on climate change issues and how the DPD can have a positive impact on this.

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						of the DPD to expand on this issue.	
173	Sam Kipling	Planning Liaison Officer Environment Agency	Question 3		Yes it is a suitable Core Waste Policy. We particularly support movement up the waste hierarchy, and landfill as the last option.	Support noted.	No changes to the plan.
174	Sam Kipling	Planning Liaison Officer Environment Agency	Question 4		Adherence to principles of proximity and driving up the hierarchy should be considered alongside the potential carbon footprint of chosen technology in each specified location.	<p>We are now adhering to the principle of the nearest appropriate location (in line with adopted RSS policy ENV12) rather than the proximity principle.</p> <p>We will consider looking at the potential carbon footprint of technologies as part of the site assessment process.</p>	No changes to the plan.
175	Sam Kipling	Planning Liaison Officer Environment Agency	Question 6		We support option 1.3 of the Core Waste Policy.	Noted	Preference noted.
176	Sam Kipling	Planning Liaison Officer Environment Agency	Question 7		Yes, we found that the Joint Sustainable Waste Management Strategy (JSWMS) is easy to access – there is no need to repeat it here.	Noted.	No changes to the plan.
177	Sam Kipling	Planning Liaison Officer Environment Agency	Question 8		Yes, the targets and objectives of the JSWMS should be reflected in the DPD.	Noted.	Noted

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178	Sam Kipling	Planning Liaison Officer Environment Agency	Question 10		We welcome your commitment to 45% recycling and to tackling waste growth. Current data suggests that a 2% projected growth is balanced by the aspiration to cut growth in waste production from the current level. This level is likely to match the proposed provision of new facilities.	Noted	Support for option 3 (2% growth rate and 45% recycling) noted.
179	Sam Kipling	Planning Liaison Officer Environment Agency	Question 11		We have no further available data on commercial industrial waste. If possible, projections should be made on the likely effects of waste reduction initiatives.	Limited data availability noted.	
180	Sam Kipling	Planning Liaison Officer Environment Agency	Question 12		The positive effects of Site Waste Management Plans are, as yet, unknown. We suggest that waste planning is linked to new development.	The link between waste planning and new development is noted. We need to plan for contingencies if the anticipated reduction expected as a result of SWMPs does not materialise.	
181	Sam Kipling	Planning Liaison Officer Environment Agency	Question 14		<p>A 2006 update for hazardous waste data is now available.</p> <p><a href="http://www.environment-agency.gov.uk/commondata/acrobat/factsheet271107_f_1918953.pdf">http://www.environment-agency.gov.uk/commondata/acrobat/factsheet271107_f_1918953.pdf</a></p> <p>This is useful as it begins to show how the newly hazardous wastes are affecting the total produced. Headline data shows that although the number of different types of hazardous waste has increased the decline in the chemical industry has lead to an overall reduction in quantity. More study is required to relate this to the particular industry sectors in Hull and East Riding.</p> <p>We agree that hazardous waste does need to be planned for on a regional basis, but for reasons of transport efficiency (tackling climate change) we would not rule out planning for facilities to deal with newly hazardous waste if this is identified as a need.</p>	<p>Weblink will be checked. Regional v Local issues, need to identify provision gap and support for minimisation of hazardous waste noted.</p>	Check the weblink re hazardous waste data.

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					<p>Many hazardous wastes are well catered for. Any identified gaps in the current provision should be made clear, along with the best options for recycling and resource conservation.</p> <p>We would support plans to encourage the minimisation of hazardous waste in the district.</p>		
182	Sam Kipling	Planning Liaison Officer Environment Agency	Question 15		<p>Agricultural Waste has been subject to regulatory change. Agricultural waste became 'controlled waste' in May 2006. Until this date most farmers were engaging in 'on farm' disposal of waste, either by burning or in farm tips. Exemptions for on farm disposal are still available for some waste types, but items such as farm plastics, scrap metal, and animal health products will have to be disposed off-site, in some cases for the first time. More study is required into the effect of the new regulations on the types of agriculture in the East Riding, and whether the amount of agriculture is reducing.</p> <p>In most cases waste from farms can be treated as commercial/industrial and does not require special facilities.</p>	Noted.	
183	Sam Kipling	Planning Liaison Officer Environment Agency	Question 16		2006/2007 Municipal solid waste data is now available on the <a href="http://www.wastedataflow.org">www.wastedataflow.org</a> and 2006 Hazardous waste figures are available on the Environment Agency website.	We will look at and assess this data.	Check both websites to see if improved data can be obtained.
184	Sam Kipling	Planning Liaison Officer Environment Agency	Question 18		There are clearly gaps in the available information, particularly with regard to areas where there has been recent new legislation. We will help where we can in the interpretation of these changes.	Noted. Help will be welcomed.	
185	Sam Kipling	Planning Liaison Officer Environment Agency	Question 20		<p>We support the allocation of specific waste sites where there is certainty about what technology is required and where the waste will come from. But there should be flexibility where treatment options are still being considered.</p> <p>We support self sufficiency in the management of waste but not at the expense of higher greener house gas emissions caused through inefficient use of resources.</p>	Noted.	
186	Sam Kipling	Planning Liaison Officer Environment	Question 23		We support option C. The location and size of facility is very much dependent on the type of technology, waste type to be processed and potential end markets. We support the minimisation of transport	Support for Option C noted.	

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		Agency			miles and the maximum use of waste as a resource. Accessibility to sustainable transport options should ideally be considered.		
187	Sam Kipling	Planning Liaison Officer Environment Agency	Question 27		The assessment criteria listed do seem to concentrate on the fact that the site may be considered 'a bad neighbour'. We support the view that the management of waste can, and should be treated as an industrial activity. The possible disbenefits can usually be managed through good design and operation. We would like to see more emphasis on sustainability, transport planning, proximity to arisings, and co-location with complimentary activities and markets for recyclates.	Support for nearest appropriate location and co-location noted.	
188	Sam Kipling	Planning Liaison Officer Environment Agency	Question 29		Yes, as above. The siting of a particular technology can make a huge difference to its eventual environmental footprint.	Support for tailored approach noted.	
189	Sam Kipling	Planning Liaison Officer Environment Agency	Question 34		We support Landfill Capacity Option 3.2.	Support for Option 3.2 noted.	
190	Sam Kipling	Planning Liaison Officer Environment Agency	Question 51		We support option 1.3 which is the statutory requirement. Hull and East Riding should consider whether they are able to provide facilities for segregated building waste from small jobs. If so, a voluntary plan for exempt jobs could be considered.	Support for Option 1.3 and suggestion for building waste facilities noted.	
191	Sam Kipling	Planning Liaison Officer Environment Agency	Question 53		Yes, we support the use of Planning Obligations in this way.	Noted.	
192	Sam Kipling	Planning Liaison Officer Environment Agency	Question 57		Yes, they are appropriate recommendations for 'Bring Sites'.	Noted.	
193	Sam Kipling	Planning Liaison Officer Environment Agency	Question 58		We have no objections to the proposed indicators.	Noted.	
254	Mr. Barry Robinson			Joint Waste Development Plan	Question. Can this document be progressed to a satisfactory final JWDPD, approved and ratified by an Inspector, on behalf of the	The issues and options	No changes.

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				Document	<p>Secretary of State?</p> <p>Answer. I believe not.</p> <p>Argument</p> <p>1). Consultation process has serious flaws.</p> <p>2). Consultation document has serious flaws.</p> <p>4). I have evidence seeming to indicate weaknesses in related policies (e.g. Joint Sustainable Waste Management Strategy (2006)). Further, the Joint Waste Management Contract prevents room for adopting new technologies.</p> <p>Evidence.</p> <p>1a). Consultation document costs £5.00; I could not have afforded it. Few Hull people can afford to get involved. Limited spectrum of resident will get involved. Not representative.</p> <p>1b). No Monitoring Officer</p> <p>2).and 3). A few examples.</p>	<p>consultation document has been written to comply with the Government's Planning Policy Statements 10 and 12 and associated regulations. At this stage, the document presents a number of different options for the public to consider generating meaningful input into the document.</p> <p>The Waste Core policy is written so that the document can consider all waste technologies provided they assist in moving waste up the waste management hierarchy. No technologies are excluded from consideration.</p> <p>It is not within the remit of the Joint</p>	

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						<p>Waste Development Plan Document to revise either the Joint Sustainable Waste Management Strategy or the Joint Waste Management Contract.</p> <p>The issues and options consultation document has been available to view and comment on at all of Hull and East Riding Councils Customer Service Centres and Libraries, Kingston House, and the Guildhall in Hull at no cost. The document has also been available over the internet for viewing and comment at no cost. The consultation was advertised in the local media and the Councils' own newsletters to</p>	

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						<p>generate awareness.</p> <p>There is no legal requirement for a monitoring officer to be in place. There is however a requirement to carry out monitoring, which we complete as part of our Annual Monitoring Report.</p>	
255	Mr. Barry Robinson			Joint Waste Development Plan Document	3). Officers conducting the consultation seem to have inadequate knowledge of, and/or seem willing to accept poor advice from colleagues on, waste issues/data.		
256	Mr. Barry Robinson		Figure 3.1	The Waste Hierarchy	<p>Page 18. Waste hierarchy diagram. Line, 'Create energy for electricity'.</p> <p>I have never before seen this corruption of the correct statement, 'Energy recovery'. It is not a mistake, it is too specifically worded. Such a statement suits WRG perfectly as they claim that, (I think it's) 22% of the energy from the Saltend incinerator will be used to produce electricity. However, they do not publicise the fact that 60% of the energy produced is heat, most of which will go to waste because there is no suitable means of using it, such as district heating. The Government recommend that efficient use of energy obtained from waste should be by, say, Combined Heat and Power systems, in order to limit unnecessary carbon emissions.</p>	<p>The line 'create energy for electricity' and the reference to burning in the waste hierarchy diagram on page 18 is an error and will be amended to reflect the fact that 'energy recovery' is second to the last option of 'disposal' in the waste hierarchy.</p> <p>An incinerator at Saltend has planning permission. It is not the job of the</p>	The waste hierarchy diagram will be amended to reflect the fact that 'energy recovery' is second to the last option of 'disposal' in the waste hierarchy.

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						Waste DPD to re-open that permission.	
257	Mr. Barry Robinson		Table C.2	Projected growth of municipal waste	<p>Pages 77 &amp; 78. Table, 'Projected growth of municipal waste. Table C2'.</p> <p>The RSS figure of 429,000 tonnes is possible. It is possibly built on fact. The figure of 391,133 tonnes, under 'Strategy Growth &amp; 45% recycling is plausible. However, by the time we get to '4% Growth &amp; 45% recycling' we've got a figure of 638,103 tonnes, 200,000 to 250,000 tonnes per annum more than the 2 previous. Shouldn't the officers have checked this projection? (It is in fact, an out of date projection, produced by the 'Waste Management Team. An attempt to justify the BPEO). Even WRG agreed in their Saltend incinerator planning submission, that they could not justify such a projection.</p> <p>The Government is demanding that we, 'reduce waste, minimise waste, prevent waste'. There is the Courtauld Agreement which aims to reduce food waste and packaging waste. The joint councils belatedly intend to reduce municipal waste growth so that by 2012 there will be zero growth. In the 18 months 2006 to mid-2007, (I think it was Hull's) municipal waste) DECREASED. Yet we have a projection that defies logic. A projection that our waste will grow at 8 times the present national value virtually for ever.</p>	A range of projections was provided.	
135	Yasin Raja	Senior Planning Officer Government Office for Yorkshire and the Humber		Joint Waste Development Plan Document	<p>The pre-submission consultation stage, as set out in Regulation 25 of the Town and Country Planning (Local Development) (England) Regulations 2004, is primarily an informal opportunity for local planning authorities to consult with the community and stakeholders during the preparation of preferred options. The following comments are based on an assessment of the general scope and content of the documents, including checking that it is realistic in relation to national and regional policy. The following comments are made without prejudice to any formal GOYH representations at subsequent consultation stages.</p> <p>The current PPS12 Companion Guide states that Regulation 25 involvement should be a continuous process rather than one discrete exercise. It is possible that further consultation may be needed as a result of comments received before submission.</p>	Noted. We are now working to the new Planning Policy Statement 12 on Local Spatial Planning.	Continue to keep track of and act upon new policy/guidance documents in taking the DPD forward.

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					<p>You will also be aware that the Government has proposed a number of measures to streamline the LDF process, including an amended set of draft regulations in respect of LDF production and a revised draft of PPS12. We expect these to be published soon. At this stage I am not able to say when the new regulations might come into force or what their content might be. However, you will clearly need to be aware of the potential implications of the new regulations and statutory guidance as you take the document forward.</p> <p>We hope that our comments will help you take forward your Development Plan Document. In addition it is important that you take account of our previous comments made by Alistair McIntyre in relation to waste &amp; minerals core strategy issues, i.e. email of 8 February 2008. I suggest account is also taken of a new guidance note which has recently been published, 'Joint Waste Planning in Metropolitan and Unitary Authorities', in further stages of the DPD's preparation. It is available at:</p> <p><a href="http://www.urbanvision.org.uk/Joint_wasteplanningstudy.html">http://www.urbanvision.org.uk/Joint_wasteplanningstudy.html</a></p> <p>Although there is currently not much best practice guidance on waste DPDs, we suggest you may find it useful to refer to the PAS website, which has an on-going list of completed DPDs which can be used for reference.</p>		
136	Yasin Raja	Senior Planning Officer Government Office for Yorkshire and the Humber		Joint Waste Development Plan Document	<p>You will need to set out information regarding your assessment of options and alternatives and their selection and rejection.</p> <p>The LDF system requires the generation and evaluation of options and alternatives. The PPS 12 companion guide 'Creating Local Development Frameworks' (CLDF) makes clear (at section 8.3) that Regulation 25 requires authorities to ensure documents are genuinely front-loaded by informally involving communities in the development of issues and alternative options and that authorities should encourage a meaningful response based on a genuine choice of options. Options could focus on implementation, e.g. locational, investment or timing related, as well as being strategic.</p> <p>Selection of the preferred approach should be progressed in</p>	We are committed to following this process. The Sustainability Assessment process is underway.	No changes required.

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					<p>comparison with the alternatives and with commitment growing at each stage. The decision making process should be transparent with the alternatives expressed as early as possible. Clear reasons will need to be given for the selection of the preferred options, together with a précis of the alternatives that were also considered (PPS12, paragraph 4.12). SA is an important element of option appraisal and should look at all options including discounted ones.</p> <p>Options need to be reasonable, realistic and relevant. It is important that the DPD should not reopen consideration of either the principles set out in RSS or the annual rates of waste to be managed (PPS10 Companion Guide, para 7.15).</p> <p>If the scope and choices seems limited in places then as the document is developed, you will need to make it explicit where options are limited because of higher level policies or other circumstances.</p> <p>(Soundness test vii)</p>		
137	Yasin Raja	Senior Planning Officer Government Office for Yorkshire and the Humber		Joint Waste Development Plan Document	<p>Explicit information will be needed on how the evidence base (including SA) has influenced the strategy and policies. Strategies, policy directions and allocations should be founded on a robust and credible evidence base. Assumptions need to be identified and supported by evidence and it should be clear how they have affected the document. You should maintain an audit trail of evidence for options and consultation.</p> <p>The JWDPD will need to draw out how the evidence base is informing the strategies and options, including national/regional level policies, and links with other strategies such as Municipal Waste Management Strategies. It should set out, where not already done, more explicitly the evidence on which the strategy including the policy options are based. To make links to the evidence clearer as the documents are taken forward, it might be helpful if more of the principal elements of the evidence base, including the SA, which influenced the policy options were briefly itemised.</p> <p>Alternative options should also be derived from the evidence base. At preferred options, therefore, the evidence base should be used to</p>	Advice noted. We will set out the evidence base (including SA) more explicitly at the preferred option stage.	To continue our commitment to this process and to set out the evidence base (including SA) more explicitly at the preferred option stage.

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					explain and justify why a particular option is not preferred as well as to explain the reasoning behind the choice of preferred option(s). (Soundness test vii)		
138	Yasin Raja	Senior Planning Officer Government Office for Yorkshire and the Humber		Joint Waste Development Plan Document	<p>You will need to develop clear mechanisms for implementation and monitoring and think more about deliverability as you progress the document towards a pre-submission draft. The PPS 12 Companion Guide (section 8.4) states that preferred options documents/pre-submission drafts must propose deliverable options that are credible in terms of resources likely to be available to implement them with clear mechanisms for delivery.</p> <p>For example, the document needs to establish targets and milestones relating to the delivery of policies and be clearer about how these are to be measured and linked to the production of the AMR. Not only delivery mechanisms but timescales for implementation for the policies should be identified and built in where possible. It also should be clear who is intended to implement each policy. Where possible, there should be evidence of buy-in of the policies by other stakeholders or authority departments. If actions are required to implement policy outside the direct control of your authority(ies) there should be evidence of the necessary commitment from the relevant organisation.</p> <p>(Soundness test viii)</p>	Advice noted. More details on the mechanisms for implementation will be included in the pre-submission consultation.	More details on the mechanisms for implementation will be included in the pre-submission consultation.
139	Yasin Raja	Senior Planning Officer Government Office for Yorkshire and the Humber		Joint Waste Development Plan Document	<p>At submission, the Waste DPD will need to demonstrate sufficient flexibility to accommodate known and unexpected changes in terms of waste management.</p> <p>(Soundness test ix)</p>	Noted	Continue to take this into account in preparing the Waste DPD
140	Yasin Raja	Senior Planning Officer Government Office for Yorkshire and the Humber		Joint Waste Development Plan Document	<p>Is the JWDPD going to have a key diagram, i.e. as a means of illustrating and improving understanding of the spatial concepts?</p> <p>Similarly, what is the position regarding Proposals Maps? Will individual proposals maps will be amended and produced? Any changes that need to be incorporated on a proposals map will require the map to be consulted upon.</p>	The Waste DPD will contain a proposals map which will be consulted on in subsequent versions of the	Inclusion of a proposals map in subsequent versions of the DPD. To consider the possible use of a key diagram and

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					You may want to consider whether you can make more use of other illustrative material, e.g. diagrams, tables.	plan. We are considering the possible use of a key diagram and illustrative material.	other illustrative material.
141	Yasin Raja	Senior Planning Officer Government Office for Yorkshire and the Humber		What is the Joint Waste Development Plan Document	What is the time period of the DPD? It should be at least ten years from adoption and should aim to look ahead to any longer time horizon set out in RSS (PPS10, paragraph 16). (Soundness test iv (b))	The DPD looks to 2026 in line with the adopted RSS timeframe.	No change required.
142	Yasin Raja	Senior Planning Officer Government Office for Yorkshire and the Humber		What is the Joint Waste Development Plan Document	<p>It is important to establish the content and strategic component of the JWDPD.</p> <p>In particular, clarity will be needed about the relationship with individual core strategies and individual allocation/DC DPDs. A key issue will be resolving what strategic component relating to waste should be included in the core strategies and what strategic component should be developed in the JWDPD. What components will be in other DPDs? You will need to establish the range and nature of policies which might need to be included in the JWDPD.</p> <p>It is noted that East Riding's Core Strategy is already published for a round of Issues &amp; Options consultation and the Hull Core Strategy is due to be published during June 2008. Under these circumstances the individual core strategies will need some waste content as a policy link in the chain of conformity. They also need to integrate waste management with other spatial concerns. This may not necessarily need to be extensive, but act as more of a marker showing the relationship with the JWDPD. It might include elements such as stressing the importance of sustainable waste treatment/waste hierarchy and commitment to dealing with waste arisings consistent with RSS (and national policy). While the general advice is to make best possible use of the core strategy it seems to me that you need to think about making more use of the JWDPD as a consequence of your particular circumstances.</p>	<p>Since the Joint Waste DPD is being produced ahead of both Authorities respective Core Strategies, the waste core strategy policy (core policy) is being produced within the DPD. An additional spatial element could be added to the Core Policy by developing the 'spatial pattern of facilities' policy section through the core policy section.</p>	Continue the current approach of developing the waste core strategy policy through the Joint Waste DPD.

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					The JWDPD will need to raise and address spatial elements. This will include the need for a vision, strategic objectives, spatial strategy, strategic & core policies. This is particularly the case as the JWDPD is progressing in advance of individual core strategies. (Soundness test vi)		
143	Yasin Raja	Senior Planning Officer Government Office for Yorkshire and the Humber		Geographical Area	You might wish to expand details of cross-boundary waste movements which are mentioned here in subsequent versions of the DPD. For instance, what waste movements occur across administrative boundaries? Is there any scope for joint working with neighbouring authorities in the consideration of methods of disposal, appropriate sites, etc.? Is there any scope for sub-regional working? (Soundness test iv (a) and test vi)	Noted	To include more details on the cross-boundary movement of waste.
144	Yasin Raja	Senior Planning Officer Government Office for Yorkshire and the Humber		Why Hull and East Riding are working together	Reference to JSWMS is noted. Issues and challenges that have been identified in this document need to be reflected in the DPD and clearly demonstrate how they will be addressed. (Soundness test iv (a))	Noted	Ensure that more detail on the issues and challenges included in Target 45+, the Joint Waste Management Strategy are included within the preferred option version of the plan.
145	Yasin Raja	Senior Planning Officer Government Office for Yorkshire and the Humber		Appraisals and Assessments	Reference to the various documents is noted. It will be important to demonstrate how the evidence base (including the SA) has influenced the strategy and policies.  SA results will therefore need to be built in. Preferred options should be supported by SA results, possibly summarised for each, so that stakeholders can see the overall and detailed performance of each option against sustainability objectives. (Soundness test iii & vii)	Noted. Sustainability Appraisal is underway and will be built in and influence the preferred options stage of the consultation.	Ensure that the evidence base (including the sustainability appraisal) influences the strategy and policies of the DPD.
146	Yasin Raja	Senior Planning Officer Government Office for Yorkshire and the Humber	2	Consultation	At submission, you will need to satisfy the Inspector that the consultation arrangements were in accordance with the SCI and relevant Regulations. (Soundness test ii)	Noted. We are working to both Authorities' adopted Statements of Community Involvement and	No changes required.

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						the relevant regulations.	
147	Yasin Raja	Senior Planning Officer Government Office for Yorkshire and the Humber		Consultation Events	This timescale and references to a preferred options stage may be subject to change following the introduction of the new Regulations later this year – although references to further consultation opportunities and the consequences of these (para 2.9) is appropriate. (Soundness test iv (b))	We are now working to the new regulations in preparing the DPD.	To continue working to the new regulations.
148	Yasin Raja	Senior Planning Officer Government Office for Yorkshire and the Humber		Consultation Events	It is misleading to say that there may be an examination. The examination process commences as soon as the document is submitted and normally lasts 4 to 6 months from the submission date. It is the extent of the subsequent hearing that will be different for each document – depending on issues raised by the representations etc. i.e. there may be a hearing, written representation, etc. It would be more accurate, therefore, to say that there will be an examination. (Soundness test iv (b))	Noted. We will clarify that an examination will take place.	To clarify that an examination will take place.
149	Yasin Raja	Senior Planning Officer Government Office for Yorkshire and the Humber	3	European, National and Regional considerations	We note that you have made fuller reference to European Waste Policy and legislation. There are also other legislation that you will need to consider, for example the Landfill Tax Regulations 1996; the Household Waste Recycling Act 2004; etc. (Soundness test iv (a))	Noted. A more comprehensive list of legislation will be included in future versions of the DPD.	A more comprehensive list of legislation to be included in future versions of the DPD.
150	Yasin Raja	Senior Planning Officer Government Office for Yorkshire and the Humber		Regional Policy	You will need to ensure the Waste DPD is in general conformity with the latest RSS that has been published recently. (Soundness test iv (c))	We are working to ensure general conformity with the adopted RSS.	No change to the plan.
151	Yasin Raja	Senior Planning Officer Government Office for Yorkshire and the Humber	4	The Plan Area	Issues should be identified from a range of sources, including the spatial portrait (key characteristics), the evidence base, the Annual Monitoring Report and the Sustainable Community Strategy. It may be that issues can also be identified via the JSWMS.  At submission you will need to satisfy the Inspector that the Waste DPD has sufficient regard to the Sustainable Community	Noted	To further ensure that all relevant issues have been identified in subsequent versions of the DPD.

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					Strategy(ies). Although the Community Strategy may not include specific recommendations for waste management, its themes should be picked up by the Core Strategy and flow through to the Waste DPD (e.g. via the vision and objectives). You may wish to make explicit any work with the Local Strategic Partnership, to help to evidence this (Soundness test v). The issues need to clearly identified and relate to the characteristics of the area and the strategy proposed should specifically seek to address these issues.		
152	Yasin Raja	Senior Planning Officer Government Office for Yorkshire and the Humber	5	Aims and Objectives	<p>Is the aim meant to be the same as the Spatial Vision?</p> <p>The vision and subsequent strategic objectives need to describe what the area should be like in the future and begin to articulate how this can be achieved.</p> <p>I accept that the Waste DPD is a lower tier DPD and the Core Strategy will establish the spatial vision, spatial objectives and core policies for the respective areas. However, I consider that this document should contain its own locally distinctive, realistic and inclusive vision of what the plan area will be like at the end of the plan period. This vision should flow clearly from the key issues for the area, and should relate to the vision in the Sustainable Community Strategy and the emerging vision in the Core Strategy. You then need to develop more refined spatial objectives upfront, tailored to the locality with clear outputs, targets and indicators and to identify areas for joint/partnership working with other agencies and stakeholders. These objectives should then be developed into SMART policies required to deliver the identified actions.</p> <p>DPDs should be cross-referred to the relevant strategic policy in the core strategy which will set the parameters of the DPD. I accept that this DPD is being progressed in advance of the core strategy but you will need to demonstrate more explicit policy linkages to ensure there is a chain of conformity. (Soundness test vi)</p>	<p>This approach will be adopted in subsequent versions of the DPD with a vision flowing from the issues facing the area, then objectives and policies flowing from the vision. We will ensure the waste core policy contains a reference to the Joint Waste DPD in order to explicitly show the policy linkages between the Core Strategies and the DPD.</p>	<p>This approach will be adopted in subsequent versions of the DPD with a vision flowing from the issues facing the area, then objectives and policies flowing from the vision. We will ensure the waste core policy contains a reference to the Joint Waste DPD in order to explicitly show the policy linkages between the Core Strategies and the DPD.</p>
153	Yasin Raja	Senior Planning Officer Government Office for	5	Aims and Objectives	<p>As mentioned at submission the JWDPD will need to demonstrate clearly the delivery mechanisms, by whom it will be delivered and specific timescales. (Soundness test viii)</p>	<p>Noted. Subsequent versions of the DPD will show who, how and</p>	<p>Subsequent versions of the DPD will show who, how, and when policies and proposals will</p>

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		Yorkshire and the Humber				when policies and proposals will be delivered.	be delivered.
154	Yasin Raja	Senior Planning Officer Government Office for Yorkshire and the Humber	5	Aims and Objectives	The strategic objectives should begin to articulate how the issues and challenges identified can be addressed and indicate the broad direction that the more detailed strategy and policy should take.  Reference here is made to the Sustainable Community Strategy and the JSWMS. It is not clear how the objectives identified relate to key characteristics and issues identified in the previous section. (Soundness test vi)	Noted. We will work on better linkages between the objectives and policy content of the plan with the key issues and challenges facing the area.	To work on better linkages between the objectives and policy content of the plan with the key issues and challenges facing the area.
155	Yasin Raja	Senior Planning Officer Government Office for Yorkshire and the Humber	6	Waste Core Policy Option	See comments already made in relation core policy (para 1.3)	Refer to our response to the comments referred to.	Refer to our response to the comments referred to.
156	Yasin Raja	Senior Planning Officer Government Office for Yorkshire and the Humber	7	Joint Waste Management Strategy	In terms of format it may have been better to have this section towards the front of the document as part of the evidence base thus identifying and guiding what the issues, challenges, vision and strategic objectives should be.  Are the questions/options realistic considering that changing the scenario in the JWMS is not within the JWDPD's scope? (Soundness test iv (a))	We will be reviewing this section for the next consultation stage of the DPD to include it as part of an evidence base section in the document.	We will be reviewing this section for the next consultation stage of the DPD to include it as part of an evidence base section in the document.
157	Yasin Raja	Senior Planning Officer Government Office for Yorkshire and the Humber	7	Joint Waste Management Strategy	It is important that subsequent versions draw out the spatial implications of the strategy and clearly indicate the delivery mechanisms for implementing the key activities within the timescale identified. (Soundness test viii)	The next consultation stage of the DPD will draw out more of the spatial implications of the strategy. This will build on responses made	The next consultation stage of the DPD will draw out more of the spatial implications of the strategy. This will build on responses made to section 10-

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						to section 10- Spatial Pattern of Facilities. Delivery mechanisms and timescales for each policy option will also be set out.	Spatial Pattern of Facilities. Delivery mechanisms and timescales for each policy option will also be set out.
158	Yasin Raja	Senior Planning Officer Government Office for Yorkshire and the Humber	8	Waste Data	You will need to ensure that the options are reasonable, realistic and relevant. (Soundness test vii)	Noted	Additional check over the options presented for subsequent versions of the DPD.
159	Yasin Raja	Senior Planning Officer Government Office for Yorkshire and the Humber	8	Waste Data	You will need to ensure that the DPD is in general conformity with the latest RSS at submission, and / or there should be adequate local justification for any policies or proposals which are not. For example where questions are raised whether the DPD should plan for less/same/more than the RSS? WPAs are required to meet RSS forecast arisings (PPS10, para 17-18)  Is there a back-up plan for changing circumstances? Considering there will be more up to date figures produced in an annual report the submission version of the DPD will need to build in flexibility. (Soundness test iv(c) & ix)	Noted. We will ensure general conformity with RSS and look at how to build flexibility into the plan for subsequent consultations on the DPD.	We will ensure general conformity with RSS and look at how to build flexibility into the plan for subsequent consultations on the DPD.
160	Yasin Raja	Senior Planning Officer Government Office for Yorkshire and the Humber	9	Criteria for Site Selection	Would this chapter be clearer if it were entitled 'Potential Sources for Sites'?	Noted.	
161	Yasin Raja	Senior Planning Officer Government Office for		Employment/Industrial Land	If by definition some waste technologies can be classed under B1c (light industrial) or B2 (general industrial) then to place restrictions on such uses in industrial areas would be inappropriate unless there are locally specific issues. These will need to be clearly identified.	Noted.	

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		Yorkshire and the Humber					
162	Yasin Raja	Senior Planning Officer Government Office for Yorkshire and the Humber	10	Spatial Pattern of Facilities	How do these spatial options relate to, and address, the issues, vision and objectives?  You may want to consider whether you can make more use of other illustrative material as a means of illustrating and improving understanding of the spatial concepts? (Soundness test vi)	Connectivity of various elements within the DPD needs improving.	Consider using more illustrative material.
163	Yasin Raja	Senior Planning Officer Government Office for Yorkshire and the Humber	11	Site Assessment Criteria	It would have help as part of the consultation to advise consultees how the criteria have been arrived at, i.e. PPS10, PPS10 companion guide, etc.	Noted. Details to be included in Preferred Options Document.	Consider including details of how criteria are selected in preferred options document.
164	Yasin Raja	Senior Planning Officer Government Office for Yorkshire and the Humber	12	Waste Planning Policies	Policies should deliver visions and objectives and you will need to ensure potential policy directions tie in with the aims and objectives as well as being in conformity with European/National Policy, RSS, and having regard to the Community Strategy and other relevant strategies and programmes. (Soundness Tests vi and vii).	Noted.	
165	Yasin Raja	Senior Planning Officer Government Office for Yorkshire and the Humber		Waste Planning Policy Options	Option 3.1 – Landfill Capacity. Is this a valid and realistic option considering para 8.28 mentions that ...much of the waste that is disposed of to landfill is sent outside the area, mainly to Winterton in North Lincolnshire. In order to reduce the amount of waste we are sending to landfill, it is likely that we will need to provide alternative facilities within Hull and the East Riding. (Soundness test vii)		
166	Yasin Raja	Senior Planning Officer Government Office for Yorkshire and the Humber	14	Monitoring the Joint Waste DPD	See previous comments on Monitoring & Implementation.	Noted.	

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167	Martin Elliot	Planning Policy Manager Yorkshire and Humber Assembly		Joint Waste Development Plan Document	<p>The Yorkshire and Humber Assembly welcomes the opportunity to comment on the Hull and East Riding Joint Waste Issues and Options document and to continue its involvement in the development of a coherent spatial planning framework for the region. The comments offered in this letter are intended to be within the spirit of continued and productive joint working.</p> <p>At this stage, the Assembly's response to the consultation document is a set of officer comments. The aim is to highlight where issues related to general conformity with the Regional Spatial Strategy might arise. When the DPD is submitted to the Secretary of State a formal Assembly view on its general conformity with the Regional Spatial Strategy will need to be given.</p> <p>The following officer comments are made in relation to the existing Regional Spatial Strategy for Yorkshire &amp; the Humber (based on the selective review of RPG12 issued in December 2004), the Draft Regional Spatial Strategy – the Yorkshire and Humber Plan (submitted to the Secretary of State in December 2005) and The Secretary of States Proposed Changes to the Yorkshire and Humber Plan (September 2007).</p> <p>Government guidance (paragraph 4.19 in PPS12) states: "Where the regional spatial strategy...has been through an Examination in Public, and the proposed changes have been published, considerable weight may be attached to that strategy because of the strong possibility that it will be published in that form by the Secretary of State".</p> <p>As the Proposed Changes are now published, Assembly responses to consultations on DPDs need to make it clear how the Proposed Changes impact on the policies quoted and to point out to local authorities that 'considerable weight' will need to be attached to them by the decision-making body and by Inspectors at Examinations of DPDs. At the same time, it will be important to note that the Assembly itself has made comments on the Proposed Changes and that the final version of the new RSS is expected in May 2008.</p> <p>Both the existing and draft Regional Spatial Strategies aim to achieve</p>	Noted, and we are now working to the adopted RSS released in May 2008.	Work to the adopted RSS released in May 2008.

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					a more sustainable pattern and form of development, investment and activity across the region, putting a greater emphasis on matching needs across the region with opportunities and managing the environment as a key resource. There is a particular emphasis on achieving the regeneration and renaissance of the region's city and town centres by making them the focus for housing, employment, shopping, leisure, education, health and cultural activities and facilities in the region (for example Policy P1, existing RSS, December 2004 and Policy YH5, Draft RSS, December 2005).		
168	Martin Elliot	Planning Policy Manager Yorkshire and Humber Assembly		Joint Waste Development Plan Document	Overall, we feel that the consultation paper and the options within it provide a comprehensive review of the waste issues facing the area and how they might be tackled in order to achieve sustainable development.	Noted	No action required.
169	Martin Elliot	Planning Policy Manager Yorkshire and Humber Assembly	5	Aims and Objectives	We consider that the document needs an explicit objective in section 5 which refers to meeting the Proposed Changes to RSS (2007) tonnage figures for waste management. The key role of the DPD will then be to allocate sufficient strategic sites and areas critical to the delivery of the Joint Waste DPDs vision. This should include sufficient sites to support the tonnage waste management targets set out in the RSS.	There is no problem in adding an additional objective to the plan for meeting the RSS tonnage figures as this is something the plan will be doing regardless of whether or not there is the specific objective.	To add an additional objective which refers to meeting the RSS tonnage figures for waste management.
170	Martin Elliot	Planning Policy Manager Yorkshire and Humber Assembly		Joint Waste Development Plan Document	We would encourage you to take account of the advice contained in the Planning Inspectorate document "Local Development Frameworks: Lessons Learnt Examining Development Plan Documents". This contains an Annex specifically detailing what waste DPDs should contain.  I trust that the comments provided here, are helpful to you as you prepare the Preferred Options. Clearly we wish to see the Core Strategy developing in general conformity with the Regional Spatial Strategy and I would be happy to discuss the points we raise here	Noted, and we will take on board the advice within the Planning Inspectorate document "Local Development Frameworks: Lessons Learnt Examining Development Plan Documents".	To use advice within the Planning Inspectorate document "Local Development Frameworks: Lessons Learnt Examining Development Plan Documents".

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					further if it would help this process.  We look forward to working with you further on and to commenting on the Preferred Options document in due course.	Examining Development Plan Documents”.	
194	Daniel Gaunt	Highways Agency		Joint Waste Development Plan Document	<p>The Highways Agency is responsible for the operation, safety and environment of the strategic road network (SRN) in England. Within Hull and East Riding of Yorkshire (H&amp;ER), the strategic road network comprises:</p> <ul style="list-style-type: none"> <li>• A63;</li> <li>• A1079; and</li> <li>• M62.</li> </ul> <p>Therefore, the comments given in this response are with reference to the potential impact of the proposals on these routes.</p> <p>The interest of the Highways Agency at the issues and options stage of the LDF process is to ensure that the decision making process gives due weight to the considerations of The Agency. During later stages, the emphasis changes to providing site or measure specific advice, to enable Local Planning Authorities to deliver their LDFs.</p>	Noted, although we understand the A1079 is now de-trunked so the comments of the Agency will be considered in relation to the M62 and the A63.	Noted
195	Daniel Gaunt	Highways Agency	5	Aims and Objectives	<p>The proposed objectives are generally considered to be appropriate for the plan. They are consistent with the relevant policy and seek to minimise the impact of waste on the community and the environment. However, it is noted that there is no specific objective of minimising the impact of waste on the operation of the strategic road network by ensuring access for non-strategic traffic by local roads. The principle of making Wakefield as self-sufficient as possible in the management of the waste it produces will minimise the impact on the SRN due to waste being moved, and therefore this is supported.</p> <p>Recommendation: It is recommended that the objectives should be expanded to clarify that appropriate access, including measures which discourage the use of the SRN for non-strategic sites, is a key criterion.</p>	Support noted. A specific objective around discouraging the use of the strategic road network by non-strategic traffic will be included in future versions of the DPD.	A specific objective around discouraging the use of the strategic road network by non-strategic traffic will be included in future versions of the DPD.
196	Daniel	Highways	6	Waste Core Policy	Questions 3-6:	This objective can	Add a further

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	Gaunt	Agency		Option	<p>It is acknowledged that the movement of bulk and strategic waste is likely in many cases to require movement via the strategic road network. However, certain non-strategic waste sites (such as municipal household waste and recycling sites) tend to attract higher levels of traffic, and as such this should be a consideration when setting the locational principles.</p> <p>Therefore, the policy is generally considered suitable. However, it is recommended that an objective should be included to the following effect:</p> <ul style="list-style-type: none"> <li>• minimise the requirement for the movement of non-strategic or non-bulk waste via the strategic road network.</li> </ul>	be added as part of the DPD.	objective to the DPD to minimise the requirement for the movement of non-strategic or non-bulk waste via the strategic road network.
197	Daniel Gaunt	Highways Agency	7	Joint Waste Management Strategy	<p>Questions 7 to 9:</p> <p>The Highways Agency generally supports the principle of maintaining the adopted Joint Waste Management Strategy. Any amendments to targets previously agreed should be assessed to determine their impacts on the strategic road network.</p>	Noted.	Support noted.
198	Daniel Gaunt	Highways Agency	8	Waste Data	<p>In respect of the level of waste of the various streams to be planned for, the Highways Agency has no specific comments to make. With respect to hazardous waste, it is recognised that processing of these streams is generally on a regional scale; proposals for new facilities should take into account the impact of waste brought into H&amp;ER.</p>	Noted. This will be taken into account.	Adjust the transport site selection criteria and policy to take this into account.
199	Daniel Gaunt	Highways Agency	9	Criteria for Site Selection	<p>The Highways Agency has no specific sites to propose for allocation as waste management sites. It is strongly recommended that the impact of a proposed site allocation on the strategic road network should be considered as a factor when allocating sites within the DPD or site allocations document.</p>	Noted. Impacts will be considered as an extra site selection criteria.	Add Impact on strategic road network to site selection criteria.
200	Daniel Gaunt	Highways Agency	10	Spatial Pattern of Facilities	<p>The policies regarding the locational principles for facilities are likely to determine the impact on the strategic road network, and therefore they are of critical interest to the Highways Agency.</p> <ul style="list-style-type: none"> <li>• Option A: dispersed distribution of Waste Facilities – while this option would ideally reduce the need to move waste over larger distances via the strategic road network, in practice smaller facilities may be restricted to a single waste stream and result in different</li> </ul>	Noted.	

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					<p>waste streams being carried further to an appropriate site.</p> <ul style="list-style-type: none"> <li>Option B: Concentrated Distribution of Waste Facilities – this option, while addressing the key problems of option A, is likely to lead to large volumes of waste being transported over a greater distance. Given the geography of the area, this is likely to have a significant impact on the A63 particularly.</li> <li>Option C – Combination of the above options – this option is preferred by the Highways Agency. Allocation of sites should be on a range of grounds; in allocating sites the size and range of waste streams included should be a major consideration.</li> </ul>		
201	Daniel Gaunt	Highways Agency	11	Site Assessment Criteria	<p>It is noted that traffic and access is a “Group A” criteria carrying a high level of weight. However, the statement as set out indicates a general assumption that movement of waste traffic via the SRN is the preferred option; the Highways Agency would object to this assumption for the reasons previously set out above.</p> <p>It is recommended however that the statement should be amended to the following effect:</p> <ul style="list-style-type: none"> <li>Traffic and Access including the suitability of road, rail, and water network and the extent to which access would require reliance on inappropriate roads, such as the use of local roads for strategic traffic and strategic roads for traffic of a local nature.</li> </ul>	Noted. The criterion will be amended to take into account reliance on inappropriate roads.	Amend criterion as above.
202	Daniel Gaunt	Highways Agency	12	Waste Planning Policies	<p>The Highways Agency has no comments in respect of Policies W1 to W5, or Policies W7 to W9.</p> <p>With respect to Policy W6, the management of waste as close as possible to source and with the need to move it minimise is consistent with Highways Agency policy set out in Circular 02/2007. Therefore, option 6.3 is generally supported.</p> <p>It is noted that Option 6.1 specifies only that a Transport Assessment must address adverse impacts on safety and the environment. However, the Highways Agency’s role also includes the operation of the strategic road network; it is considered imperative that this is included within this section. The following amended statement is therefore recommended:</p>	General support for Option 6.3 noted. Highways Agency role to be clarified in the document. Amended statement to be included.	Amend statement for inclusion in document.

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					<ul style="list-style-type: none"> <li>The applicants must demonstrate the transport implications of the development do not adversely impact on operational, safety or environmental considerations.</li> </ul>		
203	Daniel Gaunt	Highways Agency	13	Site Waste Management Plans	<p>In respect of Policy SW1, SWMPs are only of relevance to the Highways Agency in situations where the development is likely to impact on the strategic road network. However, there may be occasions when lower value projects have a substantial impact, and therefore Option 1.2 is preferred.</p> <p>As a government department the Highways Agency cannot enter in Section 106 agreements. Therefore, there are no comments in respect of Policy SW2.</p>	Noted.	
204	Daniel Gaunt	Highways Agency	14	Monitoring the Joint Waste DPD	<p>The Highways Agency has no specific comments in respect of the monitoring of the Joint Waste DPD.</p> <p>I trust the comments above will be taken into account when preparing the preferred options for the document.</p>	Noted. All comments received will be considered as part of the process.	
205	Kathryn Richmond	Clerk to the Council South Cave Parish Council		Joint Waste Development Plan Document	<p>South Cave Parish Council welcomes the general approach to the strategic plans for Waste and recycling. However, it is felt that the Plan is lacks substance with regard to local recycling facilities, such as local sort centres. Therefore, we would like to see more policies with regard to localising waste management, rather than accruing more transportation miles. Also we would like to see policies to encourage greater information dissemination, to educate the general public even further than current steps.</p>	<p>This issues and options stage of consultation sets out a number of different approaches for the public to consider and respond to. Question 23 of the document asks which spatial option is the most appropriate for managing Hull and East Riding's waste. One of the options is for a dispersed distribution of</p>	<p>A new 'education' policy should be developed through the next stages of consultation on the Waste DPD.</p>

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						<p>waste facilities serving local needs reducing the need for transport.</p> <p>As a result of feedback, a new 'education' policy will be developed in the next stage of consultation for the document to encourage information dissemination and education of the general public etc.</p>	
206	John Dennis		7	Joint Waste Management Strategy	<p>I have read with much interest the above document and am very concerned that even at this stage, when many of the major waste contractors such as Shanks and Biffa, and many local authorities here and abroad are rejecting Mass Burn Incineration as an outdated and damaging waste management technology, the joint waste authority of Hull and the East Riding still seem intent on going down the incineration route, in preference to choosing methods now available which do not damage the environment, nor the health of those ratepayers living in the vicinity of the plant.</p> <p>Even WRG's parent company, FCC Spain, in its recent (2006) Corporate Social Responsibility Report, lists incineration as only just above landfill and dumping, and below preferred technologies, thermal, composting, biomethanisation and recycling.</p> <p>In the light of changing technology and expert opinion It is in my opinion completely unacceptable that, as stated in the Document under 7.3 the Joint Waste Authority is not able to consider changing the mass-burn based strategy.</p> <p>It is many years since the joint waste strategy was decided and</p>	<p>It is not within the remit of the Joint Waste DPD to change the Joint Municipal Waste Management Strategy which adopts sustainable waste management scenario based on 45%+ recycling and incineration (energy from waste). The Joint Waste DPD is required to implement the waste management strategy by</p>	No changes to the plan.

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					<p>incineration chosen as the technology for the household waste of the City and the County. Back then Foster Street was the preferred location. Even then, whilst incineration was to be the main thrust, at least some sorting was to take place, and recycling and re-use of some of the waste was to occur resulting in a much lower amount going to the furnace, which of course was to be a much smaller affair than the one which is now proposed at Saltend. The plant now proposed will as I understand it burn all of the waste arriving there with hardly any sorting taking place.</p> <p>It is now obvious that residents of the two communities are embracing the philosophy of recycling wholeheartedly and the '45+' target is going to be met before long. With this in mind, and the fact that waste arisings are falling (due to various reasons such as moves towards less packaging by manufacturers), the proposed incinerator will prove to be vastly oversized. With construction costs rocketing, the Joint Waste Committee will have some serious questions to answer when due to the unviability of the plant, inevitably WRG apply for a relaxation of the Planning Condition that only waste produced in the joint authorities' area will be processed.</p> <p>As I understand it the consultation presently taking place is designed to obtain the opinions of ratepayers and consultees and, with those opinions in place to enable vital decisions to be made on the long-term waste management strategy of the two authorities. I urge those involved in making these major policy decisions, to note carefully those opinions and to consider whether incineration, which may have been a valid choice ten years ago, should now form the basis for dealing with the vast majority of our waste when other, more economically viable, and environmentally acceptable technologies such as anaerobic digestion have, in development terms come on leaps and bounds over the past few years.</p> <p>This is a subject of vital importance to us all and for that reason it should never be regarded as too late to have a wholesale change of direction. No-one will lose face for admitting that. In fact residents will be grateful to those who have the courage to concede, that perhaps, those decisions made long ago, are now, in the light of subsequent developments proving unsound. Whilst land-fill penalties are looming,</p>	<p>providing for sufficient sites to achieve the adopted sustainable waste management scenario.</p>	

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					<p>the purely financial issues should not be allowed to cloud the judgement of those making the decisions that will affect the lives of so many of us and our children and grandchildren.</p> <p>My family and I urge the Committee to undertake a serious re-think of all of the issues and options, and to consider whether or not it is too late to change direction. Decisions made at this stage could have a serious impact upon the health of future generations.</p>		
207	Stephen Wood			What is the Joint Waste Development Plan Document	I believe that it is wrong to look at a plan for 15/20 years, with the ever changing world developments a max of 5 years with annual reviews must be more appropriate.	Government Planning Policy in Planning Policy Statement 10 requires waste policies to look forward to the timescale set out in the recently adopted Regional Spatial Strategy which looks to 2026. Planning Policy Statement 10 also requires waste policies to be reviewed at least every five years.	The timescale of the plan is prescribed by Government Policy. No changes to plan.
208	Stephen Wood			Joint Waste Development Plan Document	<p>I see that you have 3 options for waste collection and disposal.</p> <p>1- Do as some other local authorities are doing, at source sorting and a lot of effort put into reuse, recycle with minimum to land fill (this gives you time to wait to see what new legislation comes into play over the next few years).</p> <p>2- continue the path of incineration ( this is to expensive to build) this will be out of date (if not already) within a few years as legislation on emissions are tightening at a fast rate.</p> <p>3- Look to new technology, WRG's owners FCC Spain have</p>	The Joint Waste DPD does not provide policies for individual technologies but rather, the waste Core Policy seeks to move the management of waste up the waste management	Comments noted. The Waste DPD will continue to be developed to move waste up the waste management hierarchy.

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					<p>developed and are running MBT units in Spain &amp; Portugal, these plant only need one collection with no sorting at source (must make life easier for all), Shanks are building a unit in Scotland.</p> <p>This type of unit could be incorporated at the collection and sorting plants you already run ( Wilmington /Carnaby). It is only an extension to what is already done at these sites, could you not put in MBT technology without the need for planning? The front end of these units are only sorting, you may need permission to install turbines running off digesters. A company called Biossence would build units at no cost to you, but just charge per ton for disposal (fixed price for a number of years).</p> <p>Your document does not give a broad enough picture of what is available please look at options before going forward with this document.</p>	<p>hierarchy by taking a positive approach to proposals which could achieve this. Many of these proposals will involve new technologies.</p> <p>Waste operators and landowners have been encouraged to submit a waste site bid form outlining which technologies they propose and where they intend to locate them. These are being considered through the site selection and allocations process which will reach the stage of proposing initial sites for consultation at the next stage of the document's preparation. Again many of these sites will assist in moving waste up the hierarchy.</p>	

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						It is not the job of the Waste DPD to revise Target 45+ the Joint Sustainable Waste Management Strategy (a strategy for municipal waste) which is working to a scenario of 45% plus recycling and incineration (Energy from Waste) of residual waste.	
209	Jim Uney		7	Joint Waste Management Strategy	<p>At various points within the city, informative notice boards inform the public that Hull City is a Pioneering City? Your committee are shortly to be given a chance of proving that, by recommending to both councils that the Unviable, Over Capacity Sized, Unsound, proposed Saltend Incinerator is replaced by economically viable, environmentally acceptable technologies such as Anaerobic Digestion, which has advanced in leaps and bounds in the past few years.</p> <p>A recent, (April 2008) development being built in Westmorland County in the USA, enables converting the useful Biomass stored in Municipal Solid Waste to feedstock and Ethanol in Bio refineries, I believe Sewage Sludge, of which there is a constant local supply in the East Riding can also be converted to Ethanol.</p> <p>Now that the PPC permit has been revoked there is no viable scheme for an incinerator. The applicant may submit a new application sometime but it is not a certainty that it would be successful. I believe that paragraph 1.7 of the document and table 7.1 are misleading as they do not give any indication that the incinerator project is in doubt, I also believe that the permit reversal</p>	It is not within the remit of the Joint Waste DPD to change the Joint Municipal Waste Management Strategy which adopts sustainable waste management scenario based on 45%+ recycling and incineration (energy from waste). The Joint Waste DPD is required to implement the waste management strategy by	<p>The next consultation stage of the DPD will clarify that planning permission for the incinerator at Saltend will need to have an environmental permit in order to be implemented.</p> <p>A new section will be included within subsequent versions of the DPD looking at the climate change implications of the plan.</p>

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					<p>undermines the planning approvals given by the two Councils concerned.</p> <p>Seeing that the reason for the permit revocation was on the grounds that the carbon dioxide and global warming potential had not been properly addressed surely means that global warming potential should be prominently addressed in the new strategy.</p>	<p>providing for sufficient sites to achieve the adopted sustainable waste management scenario.</p> <p>The next consultation stage of the DPD will clarify that planning permission for the incinerator at Saltend will need to to have an environmental permit in order to be implemented.</p>	
210	Malcolm Lynn	Hull and Holderness Opposing the Incinerator	Table 7.1	JSWMS Facility Requirements	<p>You will probably know that our organisation was instrumental in getting the Environment Agency to revoke the PPC permit that had been granted for the proposed incinerator at Saltend on the grounds that the Agency had failed to explain fully how greenhouse gas emissions were taken into account in its decisions. The revocation came into effect on March 8th. 2008. We believe that this revocation is an important element in setting the context for the future joint waste strategy for two reasons.</p> <p>Firstly, the revocation means that there is currently no viable scheme for an incinerator. The applicant may or may not submit a new application in due course but even if one is submitted, there is no guarantee that the application would be successful. Whatever turns out to be the case, we believe that both paragraph 1.7 of the document and Table 7.1 are misleading as they do not give any indication that the incinerator scheme is very much in doubt. HOTI also believes that the revocation undermines the planning approvals given by the two Councils concerned.</p>	<p>Noted. Future versions of the DPD will make it clear that in order to be implemented, planning consent for the Saltend Energy from Waste Plant will need an Environmental Permit from the Environment Agency.</p>	<p>Future versions of the DPD will make it clear that in order to be implemented, planning consent for the Saltend Energy from Waste Plant will need an Environmental Permit from the Environment Agency.</p>

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211	Malcolm Lynn	Hull and Holderness Opposing the Incinerator		National Legislation	<p>Secondly, the fact that the revocation was on the grounds that carbon dioxide and global warming potential had not been adequately addressed means that global warming potential should figure prominently in the future strategy, in our opinion. This issue is briefly mentioned in the national context in paragraphs 3.8 and 14.5 but there is no indication of how the assessment of global warming potential will be addressed in the new strategy. We assume that this will be considered in the Sustainability Appraisal but we would suggest that the local implications should be stated clearly in this document, as it is arguably the most important challenge facing the human race.</p> <p>These issues are fundamental to the strategy and we believe they should have been clearly stated in the document so that all consultees can properly understand the context before commenting on the detail. It is therefore possible that these deficiencies will cast doubt on the validity of the consultation process.</p>	Agree that the climate change implications could be more explicitly brought out within the DPD.	Climate change implications should be more explicitly brought out within the DPD including reference to Planning Policy Statement 1 Climate Change supplement.
212	Malcolm Lynn	Hull and Holderness Opposing the Incinerator		Joint Waste Development Plan Document	<p>Having said that, we do welcome the opportunity to comment on the document at this time and our comments are listed in the attachment to this letter, alongside a list of your questions. Please note that we have not answered questions that are not relevant to HOTI nor those that require in-depth knowledge of particular policies.</p> <p>In conclusion, we welcome the fact that consultation is taking place on such an important issue and we hope that when it is completed, Hull and the East Riding will be able to make a step change and join the ranks of the leading Local Authorities on waste management.</p>	Noted	Noted
213	Malcolm Lynn	Hull and Holderness Opposing the Incinerator	Question 1		We support these aims and objectives. In particular, we welcome the principles that waste should be addressed as a resource; that waste should be managed as close to the source or the "end market" as possible and that the public should be educated to see waste as a resource rather than as a problem.	Support noted.	No changes to the plan.
214	Malcolm Lynn	Hull and Holderness Opposing the Incinerator	Question 2		1) We believe that the objectives should include a statement on the greenhouse gas implications of the waste management options. That would help to ensure that the policy document is aligned with the relevant European and national strategies mentioned in Section 3. This would have implications both for the siting of facilities and the technologies to be employed.	We are producing a new section for the beginning of the document on the climate change implications for	We are producing a new section for the beginning of the document on the climate change implications for the plan.

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					<p>2) We would also suggest that the policy should specifically address the question of plastic wastes.</p> <p>3) There should be a clear definition of what is meant by “the Humber Sub-Region” and a specific commitment that wastes will not be imported from outside that area.</p>	<p>the plan. The Sustainability Appraisal will look at the DPDs performance in relation to greenhouse gas emissions. A sustainability objective 'To reduce greenhouse gas emissions and ensure a managed response to the effects of climate change, and to increase renewable energy generation' has been set within the Draft Scoping Report for the Sustainability Appraisal of the DPD.</p> <p>There cannot be a policy or aim for each individual waste stream including plastic wastes as this would make the document's content too unwieldy without necessarily adding</p>	<p>The Humber Sub-Region will be defined in future versions of the plan.</p>

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						<p>to the document's emphasis on moving all waste streams up the waste hierarchy.</p> <p>The Humber Sub-Region will be defined in future versions of the plan. We cannot make a commitment that waste from outside the Humber Sub-Region will not be imported into the area to be managed. Such a commitment could potentially undermine efforts to move waste up the waste management hierarchy.</p>	
215	Malcolm Lynn	Hull and Holderness Opposing the Incinerator	Question 3		The general thrust of the policy is suitable	Support noted.	No changes to the plan.
216	Malcolm Lynn	Hull and Holderness Opposing the Incinerator	Question 4		We feel the policy should include statements to address the points covered by our answer to question 2 and include a specific objective for raising public awareness. (We feel that there is a general lack of ownership of the issue and that many people feel that any solution is acceptable provided it is not in their own area.)	We are producing a new section for the beginning of the document on the climate change implications for the plan. The	We are producing a new section for the beginning of the document on the climate change implications for the plan.

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						<p>Sustainability Appraisal will look at the DPDs performance in relation to greenhouse gas emissions. A sustainability objective 'To reduce greenhouse gas emissions and ensure a managed response to the effects of climate change, and to increase renewable energy generation' has been set within the Draft Scoping Report for the Sustainability Appraisal of the DPD.</p> <p>There cannot be a policy or aim for each individual waste stream including plastic wastes as this would make the document's content too unwieldy without necessarily adding to the document's</p>	<p>We will include an objective over raising public awareness of waste issues.</p>

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						<p>emphasis on moving all waste streams up the waste hierarchy.</p> <p>We cannot make a commitment that waste from outside the Humber Sub-Region will not be imported into the area to be managed. Such a commitment could potentially undermine efforts to move waste up the waste management hierarchy.</p> <p>We will include an objective over raising public awareness of waste issues- this will involve amending the current objective to educate the public so they see waste as a resource not a problem.</p>	
217	Malcolm Lynn	Hull and Holderness Opposing the Incinerator	Question 5		There should be objectives for minimising “waste-miles” and encouraging energy-efficiency. We feel that should help (a) to encourage local solutions and ownership and ensure that facilities are strategically located and (b) to reduce the chance of half-baked	We will look to include the minimisation of waste miles as	We will look to include the minimisation of waste miles as part

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					"solutions" being put forward, as was the case with the Saltend incinerator proposal.	part of a transport objective for the DPD.	of a transport objective for the DPD.
218	Malcolm Lynn	Hull and Holderness Opposing the Incinerator	Question 6		Option 1.3 is the best of those offered. However, we feel that there should also have been an option that encouraged the segregation and recovery of re-useable materials and the prevention of potentially harmful materials being released to the environment, to reflect the expectation stated in Section 2.12 and the objective stated in Section 5.4 of addressing waste as a resource.	Noted. The implication of option approach 1.3 is that more segregation and recovery of re-useable materials would be used.	Preference noted.
219	Malcolm Lynn	Hull and Holderness Opposing the Incinerator	Question 7		No. Although we recognise that changing the current scenario is not formally within the scope of the JWDPD we do feel that the strategy should be realistic about the prospects of the proposed incinerator being built at Saltend. It would be foolish to base the strategy on the assumption that the incinerator will be built within the timescale originally envisaged. The lack of clarity on this point undermines the validity of the consultation process.	Subsequent versions of the DPD will make it clear that for planning permission for the incinerator at Saltend to be implemented it will need an Environmental Permit from the Environment Agency.  A number of different sites for a range of waste management uses/technologies will be allocated as a contingency should an Energy from Waste Plant not be operational by 2010.	Subsequent versions of the DPD will make it clear that for planning permission for the incinerator at Saltend to be implemented, it will need an Environmental Permit from the Environment Agency.  Propose a number of different sites for a range of waste management uses/technologies to be allocated as a contingency should an Energy from Waste Plant not be operational by 2010.

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220	Malcolm Lynn	Hull and Holderness Opposing the Incinerator	Question 8		Targets should not be restricted to the recycling of waste. Targets should also be set for issues affecting the carbon footprint of the strategy, such as waste-miles. Incidentally, we believe that the use of the phrase "a high 45% recycling rate" should be avoided. It does the Local Authorities no credit to claim that 45% is considered high, when the government has set a long-term target of 50%, which is actually being achieved by some Councils elsewhere in the country already.	***** Advice from waste management colleagues required*****	
221	Malcolm Lynn	Hull and Holderness Opposing the Incinerator	Question 9		There are 196 Councils in this country achieving higher recycling rates than the East Riding, which in fairness to ERYC, is much higher up the league table than Hull. Some of them should be able to give detailed answers to this question.	Examples of how other local authorities are achieving high recycling rates are discussed regionally. Every local Authority is different, for example the high percentage of terraced housing stock within Hull means that there is little space to store many different bins to facilitate recycling.	No changes to the plan.
222	Malcolm Lynn	Hull and Holderness Opposing the Incinerator	Question 10		At first sight, it appears that this question is disingenuous, in that the projections are based on out-of-date figures (2002 – 2005). We believe that the projections should be based on the most recent data, ideally 2005 – 2008 and should take account of known trends, such as population growth and ageing. The projections should also assume that the government target of 50% recycling will be met as a minimum.	We will use the most up to date figures available, whilst ensuring conformity with the Regional Spatial Strategy.	We will review the figures used again to ensure we use the most up to date figures available, whilst ensuring conformity with the Regional Spatial Strategy.
223	Malcolm Lynn	Hull and Holderness Opposing the Incinerator	Question 14		We believe that the proximity principle should apply. If Hull and the East Riding is not going to import waste from elsewhere, then by the same token, Hull and the East Riding should deal with all the waste arising in their areas – as far as is reasonably practicable.	The use of the nearest appropriate location has	

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						superseded the proximity principle, however we do recognise the need, where possible, to reduce waste miles.	
224	Malcolm Lynn	Hull and Holderness Opposing the Incinerator	Question 16		No.	Noted.	
225	Malcolm Lynn	Hull and Holderness Opposing the Incinerator	Question 17		See answer to question 10. As a matter of principle, the targets should not be "cast in stone" because that would mean there would be no mechanism for driving continuous improvement.	The DPD will be reviewed as necessary. There is no intention that the figures used will be cast in stone. We will consider adding a paragraph in the document to explain that the figures will be revised / evolve.	Consider additional paragraph explaining how the figures are likely to evolve.
226	Malcolm Lynn	Hull and Holderness Opposing the Incinerator	Question 18		The waste data up to and including third quarter figures for 2007 are available on the internet. Why were these figures and the corresponding figures from 2005 onwards not presented and used for the projections of future waste arisings?	Consideration will be given to including historic waste data for information, however, we will be guided by the RSS and will use the best data available.	
227	Malcolm Lynn	Hull and Holderness Opposing the	Question 19		No. The plan should be based on the best data available (i.e. current trends in waste arisings), with adjustments to allow for the expected growth and ageing of the population and recycling rates of at least	The best available data will be used.	

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		Incinerator			50%.		
228	Malcolm Lynn	Hull and Holderness Opposing the Incinerator	Question 20		We believe that the number and size of sites should be specified rather than earmarking specific sites for development. This would allow flexibility and prevent "planning blight".	Noted.	
229	Malcolm Lynn	Hull and Holderness Opposing the Incinerator	Question 22		<p>Given that our region has the largest - and most efficient - coal-fired power station in the country at Drax, it ought to be possible to come up with a scheme for waste disposal that not only minimises the risk of air-borne pollution from dioxins and heavy metals but also utilises waste-heat more efficiently than the stand-alone incinerator at Saltend would have done.</p> <p>As Drax already uses biomass as fuel, the use of combustible materials from MBT waste plants or digestate from anaerobic digestion plants as fuel may also be possible, especially if the waste treatment plant produced "fuel" of reasonably consistent quality. (This is in contrast to the Saltend scheme, which would simply have burned whatever waste came its way, regardless of its composition).</p> <p>Taking a wider view, the use of Drax for the disposal of treated municipal waste would reduce coal imports - and the pollution due the ash and SO2 that would have come from the coal. However, this effect would be marginal, as the waste from Hull and the East Riding would account for only about 0.5% of the station's capacity.</p>	A range of technologies will be considered as part of the DPD's production. Contingencies are needed if expected sites are not forthcoming.	
230	Malcolm Lynn	Hull and Holderness Opposing the Incinerator	Question 23		Option C. Collection sites should be local but resource recovery parks and treatment plants should be located across the area. We would caution against decisions being taken on economic grounds alone because that could encourage single-site and environmentally unsound solutions like the one that was proposed for Saltend.	Support for Option C noted.	
231	Malcolm Lynn	Hull and Holderness Opposing the Incinerator	Question 24		We assume that the waste authority will already be aware of any opportunities for improving efficiency by making arrangements with neighbouring authorities to deal with waste arisings from towns and villages at the edge of the Hull and East Riding catchment area.	The nearest appropriate location approach will be used.	
232	Malcolm Lynn	Hull and Holderness Opposing the Incinerator	Question 25		We are not in the business of trying to foist facilities on to others, even though we feel that we have been on the receiving end of that argument.	Noted.	

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233	Malcolm Lynn	Hull and Holderness Opposing the Incinerator	Question 26		Yes.	Noted.	
234	Malcolm Lynn	Hull and Holderness Opposing the Incinerator	Question 27		All the criteria are appropriate but we believe the list should also include (1) the ability to utilise waste heat (for any EfW technology) and (2) the proximity of facilities for dealing with the "product" (e.g. landfill sites, facilities for processing recovered metals, etc)	Co-location has already been addressed, but will clarify this also includes energy.	Clarify to show energy from waste is included.
235	Malcolm Lynn	Hull and Holderness Opposing the Incinerator	Question 28		Proximity to waste arisings – and the location of the landfill site – should be in Group A.	Suggestion that proximity and landfill site location should be in Group A noted.	
236	Malcolm Lynn	Hull and Holderness Opposing the Incinerator	Question 29		Yes. It is difficult to give any further detail on this point because the criteria will depend on the technology being used and government policies at the time. (For example, on April 7th this year the EA decided to change the classification of digestate produced by anaerobic digestion plants. As a result, it would now make much more sense to site such plants in rural areas than would have been the case before April 7th.)	Support for tailored approach needed.	
237	Malcolm Lynn	Hull and Holderness Opposing the Incinerator	Question 30		1.2 (See answer to question 20)	Support for Option 1.2 noted.	
238	Malcolm Lynn	Hull and Holderness Opposing the Incinerator	Question 31		No.	Noted.	
239	Malcolm Lynn	Hull and Holderness Opposing the Incinerator	Question 32		2.2. This option provides flexibility whilst minimising the risk of Greenfield developments.	Support for Option 2.2 noted.	
240	Malcolm Lynn	Hull and Holderness Opposing the Incinerator	Question 33		No.	Noted.	

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241	Malcolm Lynn	Hull and Holderness Opposing the Incinerator	Question 34		Option 3.3 may be the only practical option in the short-medium term if the incineration strategy has to be dropped, as we expect. When that matter has been resolved, Option 3.2 would be the most appropriate policy.	Practicality of Option 3.3 and desirability to pursue Option 3.2 in the longer term noted.	
242	Malcolm Lynn	Hull and Holderness Opposing the Incinerator	Question 35		No.	Noted.	
243	Malcolm Lynn	Hull and Holderness Opposing the Incinerator	Question 36		Option 4.1 offers protection for all ecologically important sites, such as Saltend, without unduly restricting the options for less ecologically sensitive locations.	Support for Option 4.1 noted.	
244	Malcolm Lynn	Hull and Holderness Opposing the Incinerator	Question 37		No.	Noted.	
245	Malcolm Lynn	Hull and Holderness Opposing the Incinerator	Question 38		5.2	Support for Option 5.2 noted.	
246	Malcolm Lynn	Hull and Holderness Opposing the Incinerator	Question 39		No	Noted.	
247	Malcolm Lynn	Hull and Holderness Opposing the Incinerator	Question 40		6.3	Support for Option 6.3 noted.	
248	Malcolm Lynn	Hull and Holderness Opposing the Incinerator	Question 41		No.	Noted.	
249	Malcolm Lynn	Hull and Holderness Opposing the	Question 42		We would prefer Option 7.3 but we are concerned that it might have adverse implications for recycling or composting.	Support for Option 7.3 and reservations	

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		Incinerator				noted.	
250	Malcolm Lynn	Hull and Holderness Opposing the Incinerator	Question 43		We suggest that a new option be drawn up, along the lines of Option 7.2 but with an additional restriction to limit facilities to those serving just the local area and of a relatively small size.	This new option will be considered.	Give consideration to a new option that includes size restrictions.
251	Malcolm Lynn	Hull and Holderness Opposing the Incinerator	Question 48		This approach seems right in principle. We believe that the recovery of materials for re-use and recycling would be best achieved by segregating waste types as far as possible. Different treatment technologies may also be more appropriate for some streams than others and this approach would avoid the "one size fits all" approach that was one of the major weaknesses with the Saltend incinerator application. For example, anaerobic digestion is already a proven and practical farm-scale option for dealing with cattle slurry. (e.g. at Westray, Orkney)	Noted.	
252	Malcolm Lynn	Hull and Holderness Opposing the Incinerator	Question 49		See answer to question 48.	Noted.	
253	Malcolm Lynn	Hull and Holderness Opposing the Incinerator	Question 61		We would suggest that an indicator is developed to reflect the carbon footprint of the waste strategy. At its simplest, this could be just the total of tonne-miles for waste handled between collection and final disposal, including journeys to landfill sties.	We will consider if there are any viable ways this can be done, however there is a lack of data for some waste streams and a lack of resources.	
302	Mr Barry Robnson	Spokesman on Waste Issues East Yorkshire EYE		Joint Waste Development Plan Document	<p>Comments – The precautionary principle</p> <p>In the past, EYE has noted that in major planning policy, the Joint Waste Local plan has usually been used by Planning Officers to negative effect, Often officers have used the JWLP to frustrate the legitimate wish of ordinary people who do not wish to see invalid, contentious waste projects forced upon them Whereas, may contentious waste projects are valid in concept, and logical, and therefore have to be accommodated, and accepted by the public, others such as incinerators, have no validity, being potentially economically disastrous, lethal from pollution point of view, and</p>	An Energy from Waste Plant at Saltend gained planning permission in January 2007. The Waste DPD cannot re-open or revoke this permission.	No changes

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					<p>environmentally destructive.</p> <p>We now have the opportunity to use waste planning policy to good effect in achieving social justice, economic sensitivity, and environmental responsibility. We must produce a Joint Waste Dev Plan in which the precautionary principle is a cornerstone. Policy must be that 'The onus has to be on the developer to prove that a major waste project is valid in concept; is necessary; represents true technological advance; and is socially just'. This is in contrast to the present situation in which the ordinary man in the street, has to prove to a monolithic Planning Authority, that the opposite is the case. No one can any longer claim that they cannot act logically, because the planning system is illogical. It is the duty of all, to stand up and be counted. We are particularly concerned to learn that in the last 30 years, mankind has destroyed one quarter of the natural world. Therefore the new, Joint Waste Development Plan must do its part to reverse this trend, not to make it worse.</p> <p>Comment 2 – Economics</p> <p>We understand that the ERYC face potential fines of £5.5 million in year 2010 because the present policy of an obsession with incineration of so called residual waste. We understand that the amount of MSW involved is small (35,000 tonnes?) This prompts the question, "Why are the council therefore involved in the building of an incinerator with 7 times this capacity?" There is no guarantee that MSW will grow, in fact. What reason do we have to believe that the joint councils are in control of the financial aspects?</p> <p>What justification is there NOW for one central, large incinerator, in an illogical position on the wrong side of Hull, on the south boundary of the county?</p>	<p>It is not within the remit of the Waste DPD to change the joint municipal waste management strategy which adopts sustainable waste management scenario based on 45%+ recycling and incineration (energy from waste). Having said that all specific site proposals that the Joint Waste DPD will contain in the future will have been through a full consultation process as part of the production of the document. Sites with planning permission will have been consulted on at the planning application stage.</p> <p>The Environment Agency looks at the pollution implications of waste proposals in</p>	

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						<p>deciding whether or not to issue an environmental permit. Certain waste management facilities cannot operate without this environmental permit being issued. We must produce a Joint Waste Dev Plan in which the precautionary principle is a cornerstone.</p>	
303	Mr Barry Robinson	Spokesman on Waste Issues East Yorkshire EYE		Joint Waste Development Plan Document	<p>To attain sustainable waste management we must create less, and admit that incineration is uneconomic. We must investigate the newer technologies such as anaerobic digestion.</p> <p>We have to be proactive towards re-use and re-cycling. We must take all steps possible to reduce any effects on climate. To produce a sustainable Joint Waste Development Plan Document (JWDPD), we must have a flexible, workable Joint Sustainable Waste Management Strategy( JSWMS). The inflexible JSWMS has failed. We cannot produce a workable JWDPD without drastic modification of the JSWMS.</p> <p>There is so much secrecy and misinformation presently regarding potential landfill fines due to incompetence and regarding secretive attempts to gain PFI funding, that I feel any consultation by the joint councils has to be regarded with scepticism. We need to be ready for this consultation results to have little relationship to our input.</p> <p>Factors such as implausible projected municipal solid waste growth figures (638,103 tons by 2021, page 78); and a deliberately corrupted waste hierarchy diagram( page 18) mean that every statement in the consultation document has to be checked</p>	<p>It is not within the remit of the Waste DPD to change the joint municipal waste management strategy which adopts sustainable waste management scenario based on 45%+ recycling and incineration (energy from waste). Having said that all specific site proposals that the Joint Waste DPD will contain in the future will have been through a full</p>	<p>Amend the waste hierarchy diagram to reflect the concept of energy from waste being the second to last option before disposal in the waste hierarchy.</p>

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						<p>consultation process as part of the production of the document. Sites with planning permission will have been consulted on at the planning application stage. Since the target is to achieve beyond 45% recycling by 2010, there is flexibility to increase recycling as more technologies are developed. The Waste Core Strategy policy takes a favourable stance on any proposals which move waste up the waste management hierarchy.</p> <p>The municipal waste figure referred to is the highest of a number of options as to the waste projections to work off in taking forward the DPD.</p>	

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						The waste hierarchy diagram will be amended to reflect the concept of energy from waste being the second to last option before disposal in the waste hierarchy.	
304	Mr Barry Robinson	Spokesman on Waste Issues East Yorkshire EYE	3	European, National and Regional considerations	<p>Incineration is only one of a number of "Energy-from-waste" technologies.</p> <p>Incineration-with-energy-recovery and energy-from waste are not interchangeable.</p> <p>A potentially more important form of EfW is anaerobic digestion (AD). Yet, I see little mention of it. AD is more adaptable than incineration. Plant can be built step wise (small module units near site of waste arising). It has a smaller carbon footprint.</p> <p>Section 3.4</p> <p>Climate change is now the major factor in waste planning. (Carbon foot print of technologies/management; the emissions produced in transporting waste; flood risk etc).</p> <p>Section 3.6</p> <p>Incineration creates it's own landfill need (240,000 Tons of waste input cerates 60,000 Tons of bottom ash 12,000 Tons of highly toxic fly ash). The latter has to be transported to treatment plant and re-transported to hazardous waste landfill.</p> <p>Sections3 .8</p> <p>Treat figurers, which indicate growth in waste arisings, with caution.</p>	<p>The DPD will not provide a policy for each different waste technology. Energy from waste through incineration is mentioned specifically because this is part of Target 45+, the Joint Waste Management Strategy for Hull and East Riding. It is not within the remit of the Waste DPD to change the joint municipal waste management strategy which adopts sustainable waste management scenario based on 45%+ recycling and incineration</p>	<p>Climate change implications should be more explicitly brought out within the DPD.</p> <p>Explicitly recognise within the Waste DPD that incineration generates waste which must be sent to landfill.</p>

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					<p>The combined affect of government emphasis on waste prevention; the enthusiasm of residential for recycling; etc will lead very soon to negative growth. (Jersey residents are so proactive that incineration targets may soon be reduced)</p>	<p>(energy from waste).</p> <p>Agree that the climate change implications could be more explicitly brought out within the DPD. There are already policies proposed within the issues and options document on transportation and flood risk.</p> <p>We recognise that incineration generates waste (some of which is hazardous) which must be sent to landfill and will make this clearer within the DPD.</p> <p>The figures we have used are the most up to date available. There are a number of options for the data and assumptions to use for each different waste type. These are presented in order</p>	

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						to facilitate a transparent consultation process, however we need to be in general conformity with the Regional Spatial Strategy which is an adopted part of the development plan for the area.	
305	Mr Barry Robinson	Spokesman on Waste Issues East Yorkshire EYE		Social trends	Hull and East Riding's increase in population is less than 1% p.a. East European immigrants are going back; the housing market is declining; young people can't afford to leave home. So, there will not be a dramatic increase in waste growth caused by population growth.	We are using the most up to date information on population for the plan. A range of scenarios for municipal waste growth have been put forward for consultation.	No change to the plan.
306	Mr Barry Robinson	Spokesman on Waste Issues East Yorkshire EYE	7	Joint Waste Management Strategy	Section 7.2 Strategy. We risk economic disaster if we try to use the JSWMS to predict our JWDPD needs far into the future (Fifteen years). We must be proactive, modifying it frequently. For instance, four years ago the predicted MSW for 2020 was 700,000 Tons p.a. Now it is 400,000 Tons p.a. by 2020. In four years time, what will the figure have dropped to? This shows the dangers of rigid predictions  Section 7.7  We must be told the truth about the failed JSWMS	National Planning Policy Statement 10 requires us to review the DPD at least every 5 years or sooner if there are signs of under provision of waste management capacity or over provision of disposal options where these would undermine movement up the waste hierarchy-	National Planning Policy Statement 10 requires us to review the DPD at least every 5 years.

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						review of the appropriate waste projections to use will be part of this.	
307	Mr Barry Robinson	Spokesman on Waste Issues East Yorkshire EYE	Question 8		Up date the JSWMS; instead of so much emphasis on incineration, Drive waste management up the hierarchy.	It is not the job of the Joint Waste DPD to revise the Joint Sustainable Waste Management Strategy. The issues and options clear the aim of the DPD to drive waste management up the waste management hierarchy.	No changes to the plan.
308	Mr Barry Robinson	Spokesman on Waste Issues East Yorkshire EYE	Question 9		'In 'Waste strategy for England ( 2007)', Central Government shows enthusiasm for anaerobic digestion rather than incineration (particularly in the Annex E) Recycling has a smaller carbon footprint and creates more jobs than dose incarnation. The Government's lessening enthusiasm for incineration is indicated in a dramatic reduction of the year 2000 target. Then, 34% of MSW was to be converted to energy by incineration. Now, the much lower target is 25% via all energy-from-waste technologies.	Noted	No changes to the plan.
309	Mr Barry Robinson	Spokesman on Waste Issues East Yorkshire EYE		Municipal Waste	An excellent source of info is DEFRA's Waste Flow Data.  Section 8.4 appears to be muddled.  Section 8.5  The JWDPD cannot be flexible because the JSWMS and the waste management contract are inflexible.	*** Advice required from waste management colleagues***	
310	Mr Barry Robinson	Spokesman on Waste	Question 11		The increase in landfill tax will make firms reduce their waste, and recycle the remainder. So the only need will be to increase the	Support for option 1 noted.	

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		Issues East Yorkshire EYE			number of waste transfer stations. Choose option No 1.		
311	Mr Barry Robinson	Spokesman on Waste Issues East Yorkshire EYE	Question 12		Will be sorted on site; recycled on site; much will be sold direct. So, there will be little need for treatment facilities. Choose option 1 for question 12.	Support for option 1 noted.	
312	Mr Barry Robinson	Spokesman on Waste Issues East Yorkshire EYE		Hazardous Waste	<p>Section 8.16</p> <p>Legislation requiring manufacturers/retailers to accept responsibility for WEE will lead to designing out hazardous properties so this will reduce problems.</p> <p>We will only need a few small transfer stations. Hazardous waste will be transferred to a few dedicated treatment facilities elsewhere.</p> <p>The voluntary sector will repair much electronic equipment for reuse.</p>	There is no evidence of this happening.	
313	Mr Barry Robinson	Spokesman on Waste Issues East Yorkshire EYE		Agricultural Waste	<p>A general economic downturn is due. Unnecessary plastic (from expensive oil) will decline; packaging will decline; waste will decline.</p> <p>So, waste such as plastic from agriculture will be no real problem.</p> <p>More uses will be found for agricultural waste for example, manufacture of insulation panels from straw. Manufacturing will increase, waste will not.</p>	An economic downturn will only have a limited impact, the Waste DPD needs to provide a long term strategy.	
314	Mr Barry Robinson	Spokesman on Waste Issues East Yorkshire EYE		Waste Growth and Capacity Requirements	<p>On page 78 there is a projection of 4% MSW growth until 2021 (This suggests Hull and East Riding MSW will grow at 8 times the national rate until 2021.) This is an unjustified deception. There will be little if any growth in MSW.</p> <p>Section 8.26</p> <p>The rise of 23%, over 16 years is deceptive.</p>	This is just one of a range of projections given.	
315	Mr Barry Robinson	Spokesman on Waste Issues East Yorkshire EYE	Question 19		Instead, use "Waste Flow Data".	Noted.	
316	Mr Barry Robinson	Spokesman on Waste	Question 23		Section 9 Site Selection Criteria.	Noted.	

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		Issues East Yorkshire EYE			<p>Show preference for small, local facilities. These can be built step-by-step (modular) when required. They will meet less planning resistance, they will encourage producer responsibility.</p> <p>Large, centralised facilities draw material from long distances. This involves excessive transport miles (Expensive, polluting, causing climate change). Discourage. Multi purpose sites, in which one facility uses the waste from another as its raw materials, are to be encouraged. Example, insulation boards manufactures can use the fibrous by-product from autoclaving of residual waste.</p> <p>Always examine in depth the economic advantages/disadvantages, and the health hazard of any project before considering approval.</p> <p>Section 9.1</p> <p>There is no mention of modern technology. There is no mention of small, stepwise incinerators.</p> <p>Much of the anaerobic digestion can be carried out on farms (catchment radius 10 miles) and, I assume, B2 industrial sites. (It should have been made clear that B2 can be within villages).</p> <p>Why the cut off date of 30th April for site development applications? It seems unnecessarily limiting.</p>		
317	Mr Barry Robinson	Spokesman on Waste Issues East Yorkshire EYE	Question 22		Yorkshire Forward has a substantial file of data on land available.	Noted. Yorkshire Forward have not mentioned this in their response.	
318	Mr Barry Robinson	Spokesman on Waste Issues East Yorkshire EYE	11	Site Assessment Criteria	<p>High Importance-</p> <p>1. Human rights/Social justice</p> <p>It is not acceptable that the poorer less articulate, who are already living in highly industrialised areas should be encumbered with the dross of others, in huge, centralised facilities.</p> <p>2. Precautionary Principle must operate at every step of selection.</p>	Preferences noted.	

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					<p>3. Climate change in all its aspects is of overriding importance.</p> <p>4. Brown field sites must have priority.</p> <p>5. The proximity to waste arisings.</p> <p>6. On site waste management.</p>		
319	Mr Barry Robinson	Spokesman on Waste Issues East Yorkshire EYE		Identifying Specific Sites	Much more attention to detailed consultation on this important issue is needed. It is a contentious point, which requires face-to-face debate.	There will be further opportunities for consultation.	
320	Mr Barry Robinson	Spokesman on Waste Issues East Yorkshire EYE	12	Waste Planning Policies	<p>How can this JWDPD be flexible? It is built on inflexibility.</p> <p>Policy W1 Safe guarding sites</p> <p>Section 12.4</p> <p>Why is only RSS data considered relevant?</p> <p>The statement, "The principle of waste management development on the sites will have been accepted by a planning inspector at examination", makes clear that our democratic rights to object in future, are to be taken away. This is unacceptable.</p> <p>Policy W2</p> <p>Brown field must always have priority.</p> <p>Policy W3</p> <p>Section 12.10</p> <p>Incineration creates a need for landfill.</p> <p>100 Tons waste input creates 25 Tons of bottom ash plus 5 Tons highly dangerous fly ash. If the Winterton landfill site does ever become inoperative then we are in real trouble. It's difficult to obtain a licence to landfill hazardous waste. The nearest site will then probably be in Gloucestershire.</p>	The document is being prepared according to the Planning and Compulsory Purchase Act 2004, and associated PPS'. There is a requirement to be in general conformity with the RSS.	

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					<p>This shows the undemocratic aims of this document. At a later date we the public will be unable to appose such planning applications.</p> <p>Policy W4 Biodiversity</p> <p>Out attitude to wildlife is disgraceful. We make rules for it protection, and then simply disregard those rules. Wildlife is irreplaceable. It must be protected, not sacrificed at the first whiff of money.</p> <p>Policy W6 Transport</p> <p>Important to keep mileage low because of green house gas emissions, road congestion; etc.</p> <p>Policy W7 Flood risk</p> <p>This must be treated seriously because of implications of the climate change.</p>		
321	Mr Barry Robinson	Spokesman on Waste Issues East Yorkshire EYE	14	Monitoring the Joint Waste DPD	<p>Monitoring must be used to ensure the authorities do the job properly. It has to be given teeth otherwise it is just a form-filling exercise.</p> <p>I see that table 14.2 (JSWMS) differs from 7.1 but both show that EFW facility has failed rendering it redundant.</p>	The JWDPD will be monitored as part of the Annual Monitoring Report as required.	
323	Mr Barry Robinson	Spokesman on Waste Issues East Yorkshire EYE	7	Joint Waste Management Strategy	<p>I ask you to accept these comments as relevant to this stage of the consultation, as they have only just come into this public domain.</p> <p>The Joint Councils have approached Defra for PFI funding.</p> <p>In the 'Expression of Interest' they claim that by 2013 recycling rate will be 56%. That waste per head will be down to 260 kg.</p> <p>If in the June edn of East Riding News page 9, it is boasted that east riding residents reduced their waste by 1% (3,000 tonnes) in the last 12 months to 208,000 tons bucking the national trend.</p> <p>In the JWDPD consultation, Options and issues, data you have provided is, ERYC municipal waste stood at 205,000 tonnes in 2005</p>		

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					<p>So clearly municipal waste is increasing dramatically slowly. At the most, at say, 0.5% p.a. So, I ask, where is the justification for continued interest in a 240,000 tpa incinerator?</p> <p>Therefore the JSWMS must be revisited (until then, work on the JWDPD is pointless.)</p> <p>Further, I claim that the council's are unfit to produce a Joint Waste Development Plan because they are intent on applying for a 240,000 tpa incinerator which is DEMONSTRABLY FAR TOO LARGE. (the required capacity could possibly be 165,000 MAX probably much less.)</p>		
264	Mr John Pilgrim	Senior Planning Executive Yorkshire Forward	3	European, National and Regional considerations	<p>The document recognises the need to address the content of the Regional Spatial Strategy, which in turn recognises the influence of Waste Strategy 2007 and its general reference to the Waste Hierarchy. The document supports RES Objective 50 (i) and 50 (iv), which seek to mitigate greenhouse gas emissions and analyse and respond to flood risk associated with climate change.</p>	Noted	No change to plan.
265	Mr John Pilgrim	Senior Planning Executive Yorkshire Forward	5	Aims and Objectives	<p>In line with the waste hierarchy, we would wish to see consideration of the 'reduce element' where this can be applied. Similarly, YF would expect that the former proximity principle be adhered to, and that the proposals would seek to treat waste as close to the point of arising as possible. When considering the aims and objectives of the DPD, we would support the prospect of promoting waste reduction and considering this alongside proximity issues.</p>	<p>Consideration of 'reduce' and 'reuse' elements will be included in subsequent versions of the DPD within a newly proposed 'education' policy.</p> <p>We are now working to the nearest appropriate location rather than the</p>	<p>Consideration of 'reduce' and 'reuse' elements will be included in subsequent versions of the DPD within a newly proposed 'education' policy.</p>

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						superseded proximity principle.	
266	Mr John Pilgrim	Senior Planning Executive Yorkshire Forward	Question 2		Furthermore in relation to question 2 we would support the introduction of buy recycled policies and encourage green procurement.	We are looking into producing an 'education' policy as part of the DPD which could look at this issue.	Production of an 'education' policy in subsequent versions of the DPD will address these aspects.
268	Mr John Pilgrim	Senior Planning Executive Yorkshire Forward	Question 23		Yorkshire Forward would support a combination of dispersed and concentrated waste facilities, in line with option C. This offers the most flexible approach to provision of a range of waste facilities in appropriate locations.	Support for Option C noted.	
269	Mr John Pilgrim	Senior Planning Executive Yorkshire Forward	11	Site Assessment Criteria	<p>Yorkshire Forward broadly supports the Site Assessment Criteria listed on page 41 and 42 of the document. However we would suggest that the current Group B criterion regarding 'proximity to waste arisings' be upgraded to Group A.</p> <p>In summary the document demonstrates compliance with existing Joint Sustainable Waste Management Strategy (JSWMS) policies. The introduction of Energy from waste is clearly preferred to mass burn incineration, but where possible if heat recovery can be applied this would be a major benefit to Sustainable Development, objectives, and would command support</p>	Support noted. Upgrading to Group A agreed.	Upgrade proximity to waste to Group A.
270	Mr John Pilgrim	Senior Planning Executive Yorkshire Forward	8	Waste Data	When considering commercial and industrial waste (question 11) the DPD should plan for the amount of waste indicated in the Regional Spatial Strategy. For Construction and Demolition, Hazardous Waste, and Agricultural waste utilise the figures in the RSS. However, it is suggested that the installation of a specific hazardous waste treatment facility may generate the need for imports to the region, and should be avoided. Perhaps better to export this small quantity of waste unless a small scale facility could operate viably (Questions 12 to 15).	We are using RSS figures and are taking the approach of exporting hazardous waste unless a small facility could operate viably.	No changes to the plan.
271	Mrs Margaret Woolston	Clerk Middleton on the Wolds Parish Council		Joint Waste Development Plan Document	As a Parish Council they do support recycling and have been very pro-active in having recycling bins in one of the local pub car parks, namely, The Robin Hood. However, the Parish Council would like to state that perhaps Local Authorities could do more to tackle the Government on excessive packaging in supermarkets etc.	This is probably something that is best tackled at the national level through the	An 'education and awareness' policy is to be developed through subsequent consultation on the

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						National Waste Strategy 2007. However an education policy will be developed through subsequent consultation on the DPD which could look at this.	DPD.
258	Mr. Barry Robinson		10	Spatial Pattern of Facilities	<p>Page 39. 'Spatial Pattern of Facilities'</p> <p>The most important document that has bearing on the JWDPD, i.e., (Planning Policy Statement – Planning and Climate Change – Supplement to Planning Policy Statement 1), makes clear that climate change is the most important factor to be considered in waste management.</p> <p>Yet nowhere do I see any indication that the officers concerned realize its central role. There is talk in this section of, 'pressure on the transport system', and, 'weighing the cost of transport', but I see nothing of, 'waste facility emissions', nor, 'transport emissions'. I see nothing on their effects on climate change. Yet, in Annex E of [the new national] Waste Strategy for England (2007), various waste management technologies are compared for their CO2 emissions.</p>	A climate Change section will be included in the preferred options document.	Produce a climate change section for the preferred options document.
259	Mr. Barry Robinson		Question 32		<p>Page 46. Section 12.7. Option 2.3. 'No preference will be given to brownfield locations over greenfield locations'.</p> <p>Shouldn't the authors, who have planning backgrounds, know that this is a nonsense question? A central plank of sustainable planning is that one builds on greenfield only if no suitable brownfield exists.</p>	This option will be discounted.	
260	Mr. Barry Robinson		Question 34		<p>Page 47. Section 2.10. 'The advantage of option 3.1 is that it supports reduction, re-use, recycling, composting, and energy recovery of waste by preventing further landfill capacity'.</p> <p>I presume the officer is unaware that a 240,000 tonnes p.a energy from waste incinerator creates 12,000 tonnes per year of fly ash which MUST be landfilled as 'special' ie hazardous waste? Where is</p>	Option 3.1 is to prevent additional landfill sites. There is existing capacity at present. We are fully aware that	

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					it to go?	incineration creates a land fill need.	
261	Mr. Barry Robinson			Why Hull and East Riding are working together	<p>Page 9. 'Why Hull and East Riding are working together'</p> <p>Quote. 'There are no landfill sites within Hull City Council's area. This means historically Hull has been reliant on other areas to provide landfill capacity'.</p> <p>Unquote.</p> <p>This is an incorrect statement indicating serious lack of knowledge on the part of officers. Hull landfilled at their own extensive Humberfield Quarry site for many years. It became prematurely full due to imprudent permission being given for its use by external local authorities.</p>	Humberfield Quarry lies within the administrative area of the East Riding of Yorkshire Council.	No change to the plan.
262	Mr. Barry Robinson		7	Joint Waste Management Strategy	<p>4). I note that the JWDPD refers to the JSWMS, pointing out that the former cannot amend the latter. The present Joint Sustainable Waste Management Strategy is in tatters. A major feature is that an incinerator shall be up and running by 2009 / 2010. This is impossible. The IPPC has been revoked. When a new one is granted, there are several legal challenges to face.</p> <p>As a result, the joint councils are in a financial mess, facing resulting fines of the order of £10 million. This is due to a disastrous concentration on incineration. This, I understand, is because they cannot now get out of a totally restrictive waste contract, demanding incineration. They should now be looking at the economics of new techniques, new technologies. (Today, I have noted that the authority in Jersey is amazed at the enthusiasm with which islanders are recycling. They are so taken aback that they are reconsidering their incinerator policy).</p> <p>Even if this JWDPD allows KHCC/ERYC eventually to build the desired incinerator, it will be too late.</p> <p>What is the logic of trying to produce a valid JWDPD?</p> <p>WRG seem to be in total control of the joint councils' waste</p>	<p>Subsequent versions of the DPD will make it clear that the implementation of the planning consent for an Incinerator at Saltend is subject to receipt of an environmental permit.</p> <p>***Need for input from waste management colleagues on this one****</p>	<p>Subsequent versions of the DPD will make it clear that the implementation of the planning consent for an Incinerator at Saltend is subject to receipt of an environmental permit.</p>

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					<p>management efforts. Credible control by the councils seems non-existent. Council-proposed Initiatives, such as improved recycling, seem to come to nothing because of cash starvation.</p> <p>I understand that the joint councils had several opportunities to withdraw, quite legally, from the waste management contract with WRG, but refused to, despite WRG's inability to produce the results required.</p> <p>In official notes, it is recorded that WRG decided that it would be more logical [in the circumstances of diminishing waste arisings] to have one single 240,000 tpa incinerator, than to build [step-by-step] a number of smaller ones. The joint councils took advice which allegedly proved this to be so.</p> <p>So, in the present situation of, WRG seemingly in control with the councils almost sleeping partners; apparently a non-negotiable waste management contract severely restricting the ability of the joint councils to manoeuvre in waste issues; a JSWMS seeming in tatters; all topped by the madness of a 'one-incinerator' logic', why are we trying to introduce some sanity into the situation?</p>		
263	Mr. Barry Robinson			Joint Waste Development Plan Document	<p>I have further proof that this is happening.</p> <p>I went to the Staithes Lane recycling centre, (run by WRG), yesterday. I had not been for several months. The place was heaving. EVERYONE was recycling. There were new skips everywhere. The enthusiasm was palpable. You had to take the greatest care to avoid being run over.</p> <p>Anyone, such as the Waste Management Team, who seem to have fed dodgy figures to the Planning Policy Officers here in Hull, (who don't seem to have a clue about waste), who suggests that here, the growth rate of municipal waste may be 4% per annum, until at least 2021, clearly has an agenda. One has now to really think. 'WHY?'</p>		
272	Mr Jack Tindall			Joint Waste Development Plan Document	<p>Quote "the BPEO exercise outcome was the recommendation of an incinerator."</p> <p>"Changing this scenario is not within the scope of the JWDPD."</p>	As the issues and options document points out, the outcome of the BPEO exercise	No change.

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					<p>Considering the opposition to the incinerator &amp; the subsequent delays &amp; costs to the council, who or when will someone see the light &amp; go for one of the many systems available. Even W.R.G.'s owners are installing non-incinerator systems</p>	<p>was the recommendation of a sustainable waste management scenario based on a high recycling rate (45%) and incineration (Energy from Waste) of residual waste. The recommended BPEO scenario for dealing with both authorities municipal waste arisings until 2020 has been duly adopted by both Councils cabinets (Hull in December 2004; East Riding in January 2005).</p> <p>It is not within the scope of the Joint Waste Development Plan Document to change this scenario.</p>	
273	Barry Robinson	Spokesman Communities Against Toxics		Joint Waste Development Plan Document	<p>To attain sustainable waste management we must create less, and admit that incineration is uneconomic. We must investigate the newer technologies such as anaerobic digestion.</p> <p>We have to be proactive towards re-use and re-cycling. We must take all steps possible to reduce any effects on climate.</p>	<p>It is not within the remit of the Waste DPD to change the joint municipal waste management strategy which</p>	<p>Amend the waste hierarchy diagram to reflect the concept of energy from waste being the second to last option before</p>

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					<p>To produce a sustainable Joint Waste Development Plan Document (JWDPD), we must have a flexible, workable Joint Sustainable Waste Management Strategy (JSWMS). The inflexible JSWMS has failed. We cannot produce a workable JWDPD without drastic modification of the JSWMS.</p> <p>There is so much secrecy and misinformation presently regarding potential landfill fines due to incompetence, and regarding secretive attempts to gain PFI funding, that I feel any consultation by the joint councils has to be regarded with scepticism. We need to be ready for this consultation results to have little relationship to our input.</p> <p>Factors such as implausible projected municipal solid waste growth figures (638,103 tons by 2021, page 78); and a deliberately corrupted waste hierarchy diagram (page 18) mean that every statement in the consultation document has to be checked</p>	<p>adopts sustainable waste management scenario based on 45%+ recycling and incineration (energy from waste). Having said that all specific site proposals that the Joint Waste DPD will contain in the future will have been through a full consultation process as part of the production of the document. Sites with planning permission will have been consulted on at the planning application stage. Since the target is to achieve beyond 45% recycling by 2010, there is flexibility to increase recycling as more technologies are developed. The Waste Core Strategy policy takes a favourable stance on any</p>	<p>disposal in the waste hierarchy.</p>

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						<p>proposals which move waste up the waste management hierarchy.</p> <p>The municipal waste figure referred to is the highest of a number of options as to the waste projections to work off in taking forward the DPD.</p> <p>The waste hierarchy diagram will be amended to reflect the concept of energy from waste being the second to last option before disposal in the waste hierarchy.</p>	
274	Barry Robinson	Spokesman Communities Against Toxics	3	European, National and Regional considerations	<p>Incineration is only one of a number of " Energy-from-waste" technologies.</p> <p>Incineration-with-energy-recovery and energy-from waste are not interchangeable.</p> <p>A potentially more important form of EfW is anaerobic digestion (AD). Yet, I see little mention of it. AD is more adaptable than incineration. Plant can be built step wise (small module units near site of waste arising). It has a smaller carbon footprint.</p>	<p>The DPD will not provide a policy for each different waste technology. Energy from waste through incineration is mentioned specifically because this is part of Target 45+, the Joint Waste Management</p>	No change to the plan.

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						Strategy for Hull and East Riding. It is not within the remit of the Waste DPD to change the joint municipal waste management strategy which adopts sustainable waste management scenario based on 45%+ recycling and incineration (energy from waste).	
275	Barry Robinson	Spokesman Communities Against Toxics		National Legislation	Climate change is now the major factor in waste planning. (Carbon foot print of technologies/management; the emissions produced in transporting waste; flood risk etc).	Agree that the climate change implications could be more explicitly brought out within the DPD. There are already policies proposed within the issues and options document on transportation and flood risk.	Climate change implications should be more explicitly brought out within the DPD including reference to Planning Policy Statement 1 Climate Change Supplement.
276	Barry Robinson	Spokesman Communities Against Toxics		National Legislation	Incineration creates it's own landfill need (240,000 Tons of waste input cerates 60,000 Tons of bottom ash 12,000 Tons of highly toxic fly ash). The latter has to be transported to treatment plant and re-transported to hazardous waste landfill.	We recognise that incineration generates waste (some of which is hazardous) which must be sent to landfill and will make this clearer within the DPD.	Explicitly recognise within the Waste DPD that incineration generates waste which must be sent to landfill.

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277	Barry Robinson	Spokesman Communities Against Toxics		National Legislation	<p>Treat figurers, which indicate growth in waste arisings, with caution.</p> <p>The combined affect of government emphasis on waste prevention; the enthusiasm of residential for recycling; etc will lead very soon to negative growth. (Jersey residents are so proactive that incineration targets may soon be reduced)</p>	<p>The figures we have used are the most up to date available. There are a number of options for the data and assumptions to use for each different waste type. These are presented in order to facilitate a transparent consultation process, however we need to be in general conformity with the Regional Spatial Strategy which is an adopted part of the development plan for the area.</p>	No change to the plan.
278	Barry Robinson	Spokesman Communities Against Toxics		Social trends	<p>Hull and East Riding's increase in population is les than 1 % p.a.</p> <p>East European immigrants are going back; the housing market is declining; young people can't afford to leave home. So, there will not be a dramatic increase in waste growth caused by population growth.</p>	<p>We are using the most up to date information on population for the plan. A range of scenarios for municipal waste growth have been put forward for consultation.</p>	No change to the plan.
279	Barry Robinson	Spokesman Communities Against Toxics	7	Joint Waste Management Strategy	<p>We risk economic disaster if we try to use the JSWMS to predict our JWDPD needs far into the future (Fifteen years). We must be proactive, modifying it frequently.</p> <p>For instance,' four years ago the predicated MSW for 2020 was</p>	<p>National Planning Policy Statement 10 requires us to review the DPD at least every 5</p>	<p>National Planning Policy Statement 10 requires us to review the DPD at least every 5 years.</p>

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					<p>700,000 Tons p.a. Now it is 400,000 Tons p.a. by 2020. In four years time, what will the figure have dropped to.</p> <p>This shows the dangers of rigid predictions.</p> <p>We must be told the truth about the failed JSWMS</p>	<p>years or sooner if there are signs of under provision of waste management capacity or over provision of disposal options where these would undermine movement up the waste hierarchy- review of the appropriate waste projections to use will be part of this.</p>	
281	Barry Robinson	Spokesman Communities Against Toxics	Question 8		<p>Up dates the JSWMS, instead of much emphasis on incineration, ~ waste management up the hierarchy.</p>	<p>It is not the job of the Joint Waste DPD to revise the Joint Sustainable Waste Management Strategy. The issues and options document makes clear the aim of the DPD to drive waste management up the waste management hierarchy.</p>	<p>No changes to the plan.</p>
282	Barry Robinson	Spokesman Communities Against Toxics	Question 11		<p>'In 'Waste strategy for England (2007)', Central Government shows enthusiasm for anaerobic digestion rather than incineration (Particularly in the Annex E)</p> <p>Recycling has a smaller carbon footprint and creates more jobs than dose incarnation.</p>	<p>Preferences noted.</p>	<p>Ensure that the document is sufficiently flexible to ensure appropriate technologies can be accommodated.</p>

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					The Government's lessening enthusiasm for incineration is indicated in a dramatic 1 reduction of the year 2000 target. Then, 34% of MSW was to be converted to energy by ~ incineration. Now, the much lower target is 25% via all energy -from-waste technologies.		
283	Barry Robinson	Spokesman Communities Against Toxics	8	Waste Data	An excellent source of info is DEFRA's Waste Flow Data. I Section 8.4 appears to be muddled.	**** Advice required from waste management colleagues***	
284	Barry Robinson	Spokesman Communities Against Toxics		Municipal Waste	Section 8.4 appears to be muddled. Section 8.5 The JWDPD cannot be flexible because the JSWMS and the waste management contract are inflexible.	Paragraph 8.4 will be clarified.  It is not within the remit of the Joint Waste DPD to change the Joint Sustainable Waste Management Strategy or the waste management contract.	Paragraph 8.4 will be clarified.
285	Barry Robinson	Spokesman Communities Against Toxics	Question 11		The increase in landfill tax will make firms reduce their waste, and recycle the remainder. So the only need will be to increase the number of waste transfer stations. Choose option No 1.	Preferences noted.	Ensure that the document is sufficiently flexible to ensure appropriate technologies can be accommodated.
286	Barry Robinson	Spokesman Communities Against Toxics	Question 12		Will be sorted on site; recycled on site; much will be sold direct. So, there will be little need for treatment facilities. Choose option 1 for question 12.	Support for option 1 noted.	
287	Barry Robinson	Spokesman Communities Against Toxics		Hazardous Waste	Legislation requiring manufacturers/retailers to accept responsibility for WEE will lead to designing, out hazardous properties so this will reduce problems.  We will only need a few small transfer stations. Hazardous waste will	There is no evidence of this happening.	

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					be transferred a few dedicated treatment facilities elsewhere.  The voluntary sector will repair much electronic equipment for reuse.		
288	Barry Robinson	Spokesman Communities Against Toxics		Agricultural Waste	A general economic downturn is due. Unnecessary plastic (from expensive oil) will decline; packaging will decline; waste will decline.  So, waste such as plastic from agriculture will be no real problem.  More uses will be found for agricultural waste for example, manufacture of insulation panels from straw. Manufacturing will increase, waste will not.	An economic downturn will only have a limited impact, the Waste DPD needs to provide a long term strategy.	
289	Barry Robinson	Spokesman Communities Against Toxics	Table C.2	Projected growth of municipal waste	On page 78 there is a projection of 4% MSW growth until 2021 (This suggests Hull and (East Riding MSW will grow at 8 times the national rate until 2021.) This is an unjustified deception.  There will be little if any growth in MSW.	A range of projections was provided.	
290	Barry Robinson	Spokesman Communities Against Toxics		Waste Growth and Capacity Requirements	Section 8.26  The rise of 23%" over 16 years is deceptive.	Figures used are from the Regional Spatial Strategy.	
291	Barry Robinson	Spokesman Communities Against Toxics	Question 19		Instead, use "Waste Flow Data".	Noted.	
292	Barry Robinson	Spokesman Communities Against Toxics	10	Spatial Pattern of Facilities	Show preference for small, local facilities. These can be built step-by-step (modular) when required. They meet less planning resistance they will encourage producer- responsibility.  Large, centralised facilities draw material from long distances. This involves excessive transport miles (Expensive, polluting, causing climate change). Discourage.  Multi purpose sites, in which one facility uses the waste from another as its raw materials, are to be encouraged. Example, insulation boards manufactures can use the fibrous by-product from autoclaving of residual waste.  Always examine in depth the economic advantages/disadvantages, and the health hazard of any project before considering approval.	Preference for local facilities and resource park noted. Policies encouraging waste synergies will be included.	Produce waste synergy policy.

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293	Barry Robinson	Spokesman Communities Against Toxics	9	Criteria for Site Selection	<p>There is no mention of modern technology. There is no mention of small, stepwise incinerators.</p> <p>Much of the anaerobic digestion can be carried out on farms (catchment radius 10 miles) and, I assume, B2 industrial sites. (It should have been made clear that B2 can be within villages).</p> <p>Why the cut off date of 30th April for site development applications? It seems unnecessarily limiting.</p>	The document has been left open with regard to technologies to avoid constraint. It is the waste hierarchy approach that is considered most important. The cut off date is not fixed, but was used to try to ensure some sites were forthcoming for inclusion in the process.	
294	Barry Robinson	Spokesman Communities Against Toxics	Question 22		Yorkshire Forward has a substantial file of data on land available.	Noted. Yorkshire Forward have not mentioned this in their response.	
295	Barry Robinson	Spokesman Communities Against Toxics	11	Site Assessment Criteria	<p>High Importance</p> <p>1. Human rights/Social justice</p> <p>It is not acceptable that the poorer less articulate, who are already living in highly- industrialised areas should be encumbered with the dross of others, in huge, centralised facilities.</p> <p>2. Precautionary Principle must operate at every step of selection. 3. Climate change in all its aspects is of overriding importance. 4. Brown field sites must have priority. 5. The proximity to waste arisings. 6. On site waste management.</p>	Preferences noted.	
296	Barry Robinson	Spokesman Communities Against Toxics		Identifying Specific Sites	Much more attention to detailed consultation on this important issue is needed. It is a contentious point, which requires face-to-face debate.	There will be further opportunities for consultation.	

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297	Barry Robinson	Spokesman Communities Against Toxics	12	Waste Planning Policies	How can this JWDPD be flexible? It is built on inflexibility.	The document is being prepared according to the Planning and Compulsory Purchase Act 2004, and associated PPS'. There is a requirement to be in general conformity with the RSS.	
298	Barry Robinson	Spokesman Communities Against Toxics		Waste Planning Policy Options	<p>Safe guarding sites</p> <p>Section 12.4</p> <p>Why is only RSS data considered relevant?</p> <p>The statement, "The principle of waste management development on the sites will have been accepted by a planning inspector at examination", makes clear that our democratic rights to object in future, are to be taken away. This is unacceptable.</p> <p>Policy W2</p> <p>Brown field must always have priority.</p> <p>Policy W3</p> <p>Section 12.10 Incineration creates a need for landfill.</p> <p>100 Tons waste input creates 25 Tons of bottom ash plus 5 Tons highly dangerous fly ash.</p> <p>If the Winterton landfill site does ever become inoperative then we are in real trouble. It's difficult to obtain a licence to landfill hazardous waste. The nearest site will then probably be in Gloucestershire.</p>	The document is being prepared according to the Planning and Compulsory Purchase Act 2004, and associated PPS'. There is a requirement to be in general conformity with the RSS.	

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					<p>This shows the undemocratic aims of this document. At a later date we the public will be unable to appose such planning applications.</p> <p>Policy W4 Bio diversity</p> <p>Out attitude to wild life is disgraceful. We make rules for it protection, and then simply disregard those rules. Wild life is irreplaceable. It must be protected, not sacrificed at the first whiff of money.</p>		
299	Barry Robinson	Spokesman Communities Against Toxics		Waste Planning Policy Options	<p>Policv W6 Transport</p> <p>Important to keep mileage low because of green house gas emissions, road congestion, etc.</p> <p>Policv W7 Flood risk</p> <p>This must be treated seriously because of implications of the climate change.</p>	Suggestion mileage is kept low because of need to reduce greenhouse gases and need to treat flood risk and climated change seriously are noted.	
300	Barry Robinson	Spokesman Communities Against Toxics	14	Monitoring the Joint Waste DPD	<p>Section 14 Monitoring the JWDPD</p> <p>Monitoring must be used to ensure the authorities do the job properly. It has to be given teeth otherwise it is just a form-filling exercise.</p> <p>I see that table 14.2 (JSWMS) differs from 7.1 but both show that EFW facility has failed rendering it redundant.</p>	The JWDPD will be monitored as part of the Annual Monitoring Report as required.	
301	Barry Robinson	Spokesman Communities Against Toxics		Joint Waste Development Plan Document	<p>Important Concepts</p> <p>1.This document, the JWDPD aims to take away our democratic rights to subject to planning policy (even if it changes in mid-stream in the future)</p> <p>2.The idea in terms of consultation seems to entrench the fossilised 45% recycling / 55% incineration policy of joint councils who are junior / sleeping partners to WRG.</p> <p>3. There are at least 3 examples of dubious tactics / inadequate knowledge. The corrupted waste hierarchy diagram (p18) the dodgy</p>	1. The issues and options stage marks the first period of widespread public involvement in the document. There will be at least two other extensive periods of consultation on the DPD as it	The waste hierarchy diagram will be amended to reflect that 'energy from waste' is the second to last option in the hierarchy.

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					<p>projected MSW figures (p78) and the statement showing the planning officer don't realize that incineration produces waste that has to be landfilled.</p> <p>4. Waste will not grow in the dramatic.....implied</p> <p>5. Although we are allegedly being consulted Andy Wainwright has made it clear that WRG are intent on pursuing the Saltend incinerator</p> <p>6. The target in the Joint Waste Management Strategy (2006) (i.e. an incinerator operating by 2009 / 2010) is unattainable YET, the council's are hell-bent still on an incinerator. They face potential fines of £10 million for 2010.</p> <p>7. We should be thinking less of waste facilities and more of manufacturing by re-using.</p> <p>8. Small – scale, modular, local facilities not centralized monolithic handling.</p> <p>9. Climate change is the No 1 planning consideration.</p>	<p>progresses to adoption. All responses are logged and given a response, these responses are also made publicly available. Everyone has a right to make representations on the document.</p> <p>2. It is not within the remit of the Waste DPD to change the Joint Sustainable Waste Management Strategy. The Waste DPD needs to implement the strategy.</p> <p>3. The waste hierarchy diagram will be amended to reflect that 'energy from waste' is the second to last option in the hierarchy.</p> <p>4. The data we use is the most up to date available. There are a</p>	

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						<p>number of options for the data and assumptions to use for each different waste type. These are presented in order to facilitate a transparent consultation process, however we need to be in general conformity with the Regional Spatial Strategy which is an adopted part of the development plan for the area.</p> <p>5 &amp; 6. Again, it is not the role of the Waste DPD to change the Joint Sustainable Waste Management Strategy.</p> <p>7 &amp; 8. The waste core policy seeks to move waste up the waste management hierarchy rather than advocate specific technologies, this allows for</p>	

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						maximum flexibility for the plan to adapt to change by accommodating new technologies as they are put forward.	
322	Paul Hart				<p>I have read the above document and am very concerned that both councils are still favouring Incineration as the preferred method of waste disposal. The size of the incinerator proposed is far to large for the amount of waste that will be generated when considering the high levels of re-cycling now being achieved. One can only assume that that re-cycling would go out of the window and everything in the green bins would be incinerated in order to make operation of the plant justifiable.</p> <p>The point at present that most alarms me is that the parent company of WRG, FCC in Spain are favouring waste disposal by Mechanical and Biological treatment(MTB) and are building smaller plants at strategic locations for this method. In this country Shanks and Biffa are also ditching incineration in favour of MTB. Why then cannot both councils concerned adopt this same approach which is a more environmentally friendly method, will significantly reduce CO2 emissions and get the public on your side. We all agree waste has to be dealt with but in light of new technology why persevere with a method that is potentially dangerous, will need 24/7 monitoring not only by the operators, but the council as well as other interested parties. If you go for new technology you will get the public as well as all other organisations on your side for once. Remember it is the public that have voted these councils into office and for once you should start listening to them. Critics of all objectors have always said, well come up with an alternative method and this is it, a method that will suit everybody. I understand MTB's can easily be added to existing waste handling facilities, therefore treating waste as near to source as possible</p> <p>instead of shipping the full length of the county to be handled. The amount of CO2 emissions generated in sending waste to one plant</p>	<p>Planning Permission for an Energy from Waste Plant at Saltend was approved by both Authorities by January 2007. This permission cannot be re-visited as part of the production of this document.</p> <p>In 2004 a Best Practicable Environmental Option (BPEO) appraisal was undertaken by waste management consultants on behalf of the Joint Authorities. The report was commissioned to inform the future of recycling and waste treatment in the region. The</p>	No change.

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					<p>would be unreal, especially as the plant is not even central in the county.</p> <p>Hedon Road is already a heavily congested road as I travel this route daily in both directions. The additional volume of vehicles travelling to and from this plant will impact significantly on the air quality from one end of Hull to the other. In trying to make Hull a top 10 city do you really want the image of waste trucks travelling though the city at the volume they will. This is the image the national press and television will see. I would like to see some calculations on the CO2 emissions that will be discharged along the main routes within Hull as I believe these could be quite frightening along with the emissions from the plant as well. I believe it would be in the interests of us all and our future generations that both councils re-consider this whole issue and change their policies in such a way as to forget Incineration and opt for MTB at smaller plants scattered around the city and county. Lets all start working together instead of against each other. I have grandchildren living in the vicinity of the proposed incinerator and I am truly concerned for their health in the future, as it will be at least 10 years before facts can be proved on how dangerous incineration is. My response has purposely avoiding all the technical jargon and facts and figures as there are people more informed and qualified on these matters than myself. Mine is a common sense reply and I trust you will endeavour to take this on board and re think your complete waste strategy.</p>	<p>outcome of the BPEO exercise was the recommendation of a sustainable waste management scenario based on a high recycling rate (45%) and incineration (Energy from Waste) of residual waste. The recommended BPEO scenario for dealing with both authorities municipal waste arisings until 2020 has been duly adopted by both Councils cabinets (Hull in December 2004; East Riding in January 2005). It is not within the remit of the Joint Waste Development Plan Document to re-visit this adopted scenario.</p> <p>Recycling will continue to increase even with an Energy from Waste Plan</p>	

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						<p>operational. A target of 45% plus recycling of household waste is included within Target 45+, the Joint Waste Management Strategy for the area. Both Councils are committed to achieving this target and are looking at different ways of achieving it. In some parts of the East Riding, there is currently a brown bin trial for green garden waste.</p> <p>It is not the role of the Joint Waste Development Plan Document to consider the health impacts of waste facilities. The Environment Agency consider these impacts for each proposal as part of the waste permitting regime.</p>	