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Department
for Environment
Food & Rural Affairs

Environmental Permitting

Consultation on Draft Environmental Permitting (England and Wales) (Amendment) Regulations 2013 - a package of measures

A summary of responses to the consultation & government response

November 2013

Llywodraeth Cymru
Welsh Government

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Background

1.1 Government ran a consultation exercise from 7th February to 4th April seeking comments on proposed amendments, generally of a deregulatory nature, to the Environmental Permitting (England and Wales) Regulations 2010[1] (EP Regulations 2010).

1.2 We are grateful to respondents for taking the time to consider and comment on the proposals set out in the consultation document.

Objectives of the Proposals

2.1 The following changes to the EP Regulations 2010 were proposed in the consultation document:

- Removing the requirement for waste businesses to have to secure planning permission for certain waste operations before an environmental permit can be issued;
- Providing a registration scheme for low risk discharges to groundwater from some ground source heating and cooling systems;
- Simplifying requirements on regulators in maintaining twin systems of public registers containing information connected with permit determinations;
- Possibly transferring the handling of appeals under the Environmental Permitting Regulations 2010 from the Planning Inspectorate to the environment jurisdiction of the First Tier Tribunal;
- Making a number of other miscellaneous proposals:

    - Minor simplifications to regulators' handling of standard rules permits;
    - Simplifying requirements relating to landowner permission to clean up;
    - Correcting two oversights in respect of permit transfers; and
    - Allowing greater flexibility in relation to the service of notices on the body corporate.

[1] S.I. 2010/675 as amended.

Analysis of the responses

3.1. Over 600 organisations in England and Wales were alerted to the consultation exercise. Fifty-three responses were received: 22 from local authorities or local authority representative organisations; 12 from companies (four in the waste sector, seven in the water sector and one rail company); seven from trade associations; eight from Non-Governmental Organisations (NGOs); two from regulators; and two from consultancies. Not all respondents commented on all the proposals as the following analysis indicates. Two respondents welcomed the opportunity to offer views but confirmed that they had no comments to make. A list of respondents is at annex A.

Summary of the views of respondents & government[2] response

Proposal to remove the requirement for waste businesses to have to secure planning permission for certain waste operations before an environmental permit can be issued.

4.1. This purpose of this proposal was to offer greater flexibility around the requirement for certain waste businesses to have to secure relevant planning permission as a pre-requisite to the grant of an environmental permit. We asked the following questions:

> Do you support the proposal to provide greater flexibility to waste operators by removing the pre-requisite requirement for planning permission to the grant of a permit for certain waste operations? If not, why not?
>
> If you do agree to the removal of the pre-requisite need for planning permission, do you have any comments on whether that should be in all circumstances or whether some activities still merit the planning determination to precede the permitting decision?
>
> Do you have any comments on specific issues that might require amended or further guidance on the interface between planning and permitting?
>
> Do you have any comments on the transition costs and other costs arising from this change in policy?

4.2 Thirty-nine respondents commented on this proposal: 16 from local authorities or LA representative organisations; 10 from companies (five in the waste sector, four in the water sector, one rail company); eight from NGOs; three from trade associations; and one each from a regulator and a consultancy.

[2] Unless otherwise indicated, “Government” should be taken to mean both the UK Government and the Welsh Government.

4.3 Overall, there was a majority in favour of the proposal (i.e. agreeing with the first question above). Apart from conflicting views expressed by local authorities/LA representative bodies (see below), only one other respondent was opposed to the proposal although some others did offer caveats to their support.

4.4 Those operating in the waste sector welcomed the opportunity for greater flexibility in being able to sequence applications for planning and environmental permissions according to business need. For example, one respondent noted that applying simultaneously provided the most efficient and effective approach, recognising that a new facility would not be built without the necessary planning permission even if an environmental permit had been issued. However, one waste operator voiced concern that rogue operators might be tempted to secure an environmental permit but then flaunt the planning regime.

4.5 Those operating in the water sector also offered their general support for the proposal, with one company observing the potential for reduced costs brought about by concurrent, rather than sequential, applications.

4.6 Comments from NGOs included support for an applicant being able to choose which permission to seek first as different considerations might apply in different circumstances. Additionally, allowing environmental regulators to reach their decision independently of the planning process might provide an earlier assessment of environmental risks and potential mitigation. One respondent felt that it was illogical that the existing requirement applied only to some but not all waste operators and that it should be removed. Another sought re-assurance that safeguards for the historic environment provided by the planning regime would not be weakened. This was supported by a further view that planning considerations should not be undermined by the issuing of an environmental permit - it remained imperative that operators understood the need for both permissions to be granted where appropriate.

4.7 Views provided by local authorities/LA representative bodies differed – 10 were broadly in agreement with the proposal, mirroring the views of other respondents. However, five local authorities disagreed (one was non-committal) with the proposal on the grounds that a relaxation of the requirements could encourage certain types of operator to operate in breach of planning controls. It was suggested that this could lead to lengthy and costly enforcement proceedings. One local authority remarked that more formal consultation mechanisms between the Environment Agency and local authorities would need to be put in place to ensure the need for planning permission would not be overlooked.

4.8 In response to the other questions posed in the consultation document on this issue, the majority of respondents felt that lifting the pre-requisite for planning permission should not be restricted in any circumstance. A few disagreed. One local authority commented that planning permission might be needed in advance of securing an environmental permit for contentious developments of local significance where interested parties may need reassurance that the issues of land use and operator competence were being dealt with separately. This was mirrored in the views of an operator who felt that planning permission might be required in advance of the permit where the operation's locality, size and potential for controversy warranted such an approach. One NGO thought that the flexibility should not be offered to operators in the mining and extractive industries where planning issues around need and location should take priority (another respondent agreed that it should not be extended to mining but did not provide a reason). One trade

association commented that quarries operating under the Mining Waste Directive require planning permission before any extraction can take place.

4.9 Several respondents commented on the need for further guidance on certain issues. One NGO and one water company called for further guidance on the roles and responsibilities of the relevant authorities to reflect the regulatory change. Two local authorities called for a clear structure for consultation between the regulators to ensure planning requirements were not overlooked. One NGO offered to discuss guidance on the consideration of the historic environment in the context of the planning/permitting interface.

4.10 No respondent provided quantitative comments on the cost/benefit estimates given in the consultation document on this proposal. One operator offered the view that it was unlikely that businesses would make savings at the higher end of the scale suggested. A trade association sought clarification regarding the status and costs associated with securing an environmental permit only for planning permission subsequently to be refused.

Government response

4.11 Government notes that there is over a three-quarter majority view expressed by the respondents for the removal of the pre-requisite requirement for planning permission to the grant of a permit for certain waste operations.

4.12 There are clearly arguments for and against the planning pre-requisite. It is the local planning authority that will determine if a waste facility is needed and, if so, what type is appropriate giving due consideration to the waste hierarchy and local waste plan. In supporting the proposal to remove the pre-requisite need for planning permission, some local authorities were concerned that relaxation of the requirements could encourage certain types of operators to obtain the permit and then proceed to operate before being granted planning permission. However, it is equally the case that the grant of planning permission might encourage operation without an environment permit. Furthermore the need for a facility of a certain type has to be balanced with an assessment of the specific risk posed to health and the environment.

4.13 The weight of argument is in favour of giving maximum flexibility to operators and we therefore propose to remove the pre-requisite need for planning permission to the grant of an environmental permit.

4.14 In response to question two, some respondents expressed a desire to retain the pre-requisite for planning in respect of mining waste facilities. This is on the basis that approvals needed for setting up a mineral extraction facility are more focused on planning than some other types of operation. It may be prudent for operators to secure planning in respect of the whole mining operation first, without which no waste facility will be needed. However, there is no reason why an operator should not apply for an environmental permit for a mining waste facility from the Environment Agency/Natural Resources Wales (NRW) at the same time or in advance if they so choose. Government is satisfied that removing the pre-requisite need for planning for mining waste facilities will not result in under-implementation of the Mining Waste Directive.

4.15 Nevertheless, it would be a retrograde step if as a result of removing the pre-requisite need for planning, there was less co-operation between the relevant planning authority and the Environment Agency/NRW. This remains important for all types of facility

but particularly for contentious proposals, those relating to extractive wastes and for landfill sites where the requirements of the Landfill Directive relating to site location are relevant to both planners and the Environment Agency/NRW.

4.16 The National Planning Policy Framework recognises the close relationship between planning and permitting and existing UK Government policy is to make sure that the two regimes work together effectively with the minimum amount of regulatory overlap. The review into planning guidance, led by Lord Taylor of Goss Moor, proposed that new guidance was required on the relationship on planning and pollution control. Furthermore, as a commitment to implement the Penfold review of planning and non-planning consent, the UK Government committed itself to prepare a protocol to improve the interface between planning and pollution control. This protocol will identify criteria to assist developers and regulatory and planning authorities over the sequencing of planning permission and environmental permits. It will be developed in line with Lord Taylor's principles for planning guidance and will address the genuine concerns and issues that might arise from the removal the pre-requisite need for planning permission for all types of facility.

4.17 In response to the comments about the need for further guidance on the clarification of roles between the planning authority and the regulator, the Environment Agency has already published a guide on the relationship between planning and permitting, including the respective roles and responsibilities in dealing with planning applications where an environmental permit is needed. This guide is available at http://a0768b4a8a31e106d8b0-50dc802554eb38a24458b98ff72d550b.r19.cf3.rackcdn.com/LIT_7260_bba627.pdf.

Proposal to provide a registration scheme for low risk discharges to groundwater from some ground source heating and cooling systems

5.1 The purpose of this proposal was to deregulate low risk discharges to groundwater from certain ground source heating and cooling (GSHC) systems, offering a registration scheme that contains criteria to ensure continued environmental protection. We asked the following questions:

> Do you agree with the proposal to deregulate the discharge from certain low risk GSHC systems? If not, why not?
>
> Do you agree with the criteria and conditions attached to the exemption? If not, why not?

5.2 Twenty-two respondents commented on this proposal: seven from local authorities or LA representative organisations; six from companies (four in the water sector, one in the waste sector, one rail company); six from NGOs; one from a trade association; and one each from a regulator and a consultancy.

5.3 The great majority of respondents agreed with the proposal to deregulate discharges from certain GSHC systems and supported the criteria and conditions attached to the proposed exemption. Some respondents, notably water companies, raised some issues around monitoring and enforcement. One asked who would be checking that exemption conditions were being complied with and that nothing dangerous was being discharged into groundwater, noting that some discharges could be difficult to detect and remediate. The respondent called for further governance to safeguard groundwater perhaps through an annual inspection requirement or an operator having adequate insurance cover. Another sought re-assurance that there would be robust audit procedures in place to ensure there were no unforeseen effects on the quality and availability of groundwater. A third water company also voiced concerns around the risk to water quality, recommending that baseline monitoring continues to check the appropriateness of the exemption. It had reservations about the potential cumulative effect from GSHC systems located close to other sources of discharge.

5.4 One NGO, while supporting deregulation without increasing environmental risks, commented that the lack of supporting scientific justification made it difficult to assess the impact of the change. The potential changes to temperature limits could have an adverse effect of surface water temperature, possibly affecting oxygen levels. Another NGO questioned the condition not to discharge within 50m of a Site of Special Scientific Interest (SSSI), European protected site or drinking water supply as the water would be returned with nothing added. Conversely, one regulator called for a discussion with the Environment Agency about the basis for the screening distances to ensure they provided adequate protection to SSSIs and European sites.

5.5 One consultancy offered a number of detailed comments on the proposed conditions and suggested a monitoring scheme be put in place.

Government response

5.6 In light of respondents' overall support to the proposal, Government intends to proceed to make the amendment. On the issue of the apparent lack of compliance and monitoring conditions to ensure the protection of groundwater and dependent activities, the Environment Agency will expect operators to monitor abstraction and discharge rates and temperature as a matter of routine within standard parameters and frequency that will be set out in the exemption conditions. There will be no requirement to formally submit a compliance report.

5.7 In light of respondents' views, Government will:

- Amend the exemption criteria both to focus on the balance to the aquifer rather than the balance within the building;
- Amend the wording on protected wetlands to refer to groundwater dependent ecosystems and watercourses. This will include statutory and non-statutory wetlands, the proximity to rivers and streams and the potential for lowering of dissolved oxygen levels;
- Specify the baseline conditions prior to development that will be used to assess compliance. This will reduce the potential for creeping temperature rise within the aquifer.

5.8 So far as the issue of groundwater quality protection is concerned, Government considers that the exemption conditions set out in the consultation document (namely that nothing should be added to the water discharged from the system and that the system must not be on a known contaminated site or have had a previous contaminative use) should provide adequate protection. This will be underpinned by an additional constraint within the exemption conditions stating that the system should be sealed so that the water is not used for any other purpose or come into contact with contaminated sources.

Proposal to simplify requirements on regulators in maintaining twin systems of public registers containing information connected with permit determinations

6.1 The purpose of this proposal was to streamline permit information held on public registers by regulators, removing the requirement for local authorities to maintain public registers that duplicate the contents of the Environment Agency public register (in Wales, since the beginning of April this year, the Natural Resources Wales (NRW) public register). Such information would instead be held solely by the Environment Agency and NRW who would take compensatory measures to ensure that information remains available and accessible. We asked the following questions:

> Do you agree with the proposal to remove the requirement for local authorities to maintain duplicate public register permit information to that held by the Environment Agency? If not, why not?
>
> Do you agree with the proposed arrangements to ensure the information is available to those seeking it?

6.2 Thirty-four respondents commented on this proposal: 14 from local authorities or LA representative organisations; 10 from companies (five in the water sector, four in the waste sector, one rail company); seven from NGOs; three from trade associations; and one from a consultancy.

6.3 There was near unanimity with the proposal to stop regulators needing to maintain duplicate public registers and overall support for the compensatory measures set out in the consultation document. One local authority expressed concern that a lack of a public register at local level might compromise consultation with residents neighbouring new developments. Another local authority questioned whether the information held by the Environment Agency was sufficiently comprehensive in that some documentation might not be available free of charge, for example information appended to a permit. A trade association sought re-assurance that the public register would be kept up-to-date.

6.4 Two respondents doubted whether a straw poll of 17 local authorities provided sufficient evidence on which to base the proposal. Others were content provided there was an assurance that public register information remained accessible, straightforward, well known and understood. Another noted that it remained important for local authorities to continue to provide information on the permit/licence requirements within their catchments. One waste operator questioned whether there was scope to reduce the necessity for the continuing submission of hard copy documentation in support of a permit application, in order to reduce costs. One consultant disagreed with the compensatory proposal to send out hard copies to interested parties who request them as this could be costly (for example Environmental Impact Assessments can run to many hundreds of pages).

Government response

6.5 Given the almost unanimous support for the proposal and agreement with the planned arrangements to enable interested parties to have continued access to information, Government intends to proceed with the amendment. The Environment Agency is committed to ensuring that public register information is available to those who seek it. It will review hard copy requirements and how copies of information are sent to consultees. Its National Permitting Service is reviewing their Working Together Agreements with consultees and the potential for the greater use of email. The Environment Agency is also increasing the number and availability of standard rules permits, reducing the amount of documentation required. It is developing electronic application forms which should be available sometime in 2014.

Proposal to possibly transfer the handling of appeals under the Environmental Permitting Regulations 2010 from the Planning Inspectorate, under delegated powers from the Secretary of State and Welsh Ministers, to the environment jurisdiction of the First Tier Tribunal

7.1 We asked the following questions:

> Do you consider that the FTT is an appropriate destination for appeals under the Environmental Permitting Regulations 2010, or should they remain with PINS?
>
> Do you consider that the General Regulatory Chamber Rules will suit the handling of these appeals? If not, why not?

7.2 Twenty-nine respondents commented on the proposal: nine from local authorities or LA representative organisations; 11 from companies (seven in the water sector, three in the waste sector and one rail company); five NGOs; three trade associations; and one regulator.

7.3 Views were mixed on the possible transfer of appeals to the FTT. A number of respondents supported the transfer in principle with some indicating that they had had little experience of the current appeals process. The reasoning included a belief that the FTT would offer a more appropriate and responsive decision making process and that appeals should be part of a judicial process, offering a more balanced perspective. One NGO involved in the Macrory review into strengthening the new Environment Tribunal commented that there were problems in the existing appeal system that could be addressed by such a transfer; and that the ability to appeal on matters of law to the Upper Tribunal rather than the High Court would likely lead to speedier and potentially cheaper decisions for all parties. Two local authorities and another NGO supported this, observing that current processes could be time consuming and costly to the regulator. The ability of the FTT to strike out frivolous claims was welcomed by some respondents.

7.4 Conversely, several respondents opposed the proposal on the grounds that it would be preferable for the Planning Inspectorate (PINS) to continue to conduct appeals in the context of the proposed development and that PINS had well established procedures and the necessary expertise. Should the transfer go ahead, there was concern that the necessary training of FTT staff and Judiciary would need to be undertaken before the transfer; that sufficient resources would be provided to ensure an effective service; and that the parties should continue to be encouraged to seek resolution outside of a formal hearing. Two respondents from the water sector commented that there should be an option of an appeals route to either PINS or the FTT. One trade association was concerned about the potential for future introduction of fees for appeals.

7.5 A significant number of respondents strongly opposed the reduction in the time limit for lodging appeals from six months to 28 days. They considered that this was insufficient

time for gathering and submitting the necessary, often complex, technical evidence. One NGO commented that such a curtailment of appellants' current legal rights would result in the strong likelihood of an increase in appeals simply to protect the appellant's position while considering whether to pursue the appeal. The respondent pointed to the experience of the appeals process under the Planning and Compulsory Purchase Act 2004 where the reduction in the time limit for appeals from six months to three months was subsequently abandoned for this reason.

7.6 One water company noted that variations to permits were not always the choice of the permit holder and that full discussions did not always take place prior to the variation, potentially contravening rule 2 of the General Regulatory Chamber Rules concerned with cases being dealt with fairly and justly. One NGO questioned the exclusion of confidentiality appeals under regulation 53 of EPR from the potential transfer as FTT had the necessary expertise in this area regarding appeals against information rights decisions. It strongly supported the view that permitting appeals for facilities based in Wales should be heard in Wales.

Government response

7.7 Whilst we indicated in the consultation document that we were minded to transfer the handling of appeals from PINS to the FTT, the consultation raised a number of issues that need to be considered in more detail together. In addition to this a revised assessment of the likely costs and benefits to the public purse is required. The costs will include the need to conduct recruitment exercises for experts to sit as Tribunal panel members and investment in IT and administrative processes within Her Majesty's Courts and Tribunals Service. Officials will further examine these issues before seeking Ministers' views as to whether to proceed.

7.8 More generally, the UK Government will continue to look to develop the environmental jurisdiction of the General Regulatory Chamber in the First-tier Tribunal.

Proposal to make a number of other miscellaneous proposals:

- **Minor simplifications to regulators' handling of standard rules permits**
- **Simplifying requirements relating to landowner permission to clean up**
- **Correcting two oversights in respect of permit transfers**
- **Allowing greater flexibility in relation to the service of notices on the body corporate**

8.1 The purpose of these miscellaneous proposals was to introduce some minor simplifications to permitting processes by amending standard rules permits in certain circumstances; easing requirements on gaining landowner permission to clean up after a spill; correcting anomalies in how permits are transferred; and introducing greater flexibility in persons on whom a notice can be served. We asked the following questions:

> Do you agree with these miscellaneous proposals? If not, which ones do you disagree with and why?

8.2 Twenty-eight respondents signalled their agreement to, or commented on one or more of the miscellaneous proposals. Eight responses were from local authorities or LA representative organisations; 10 from companies (six in the water sector, four in the waste sector); four from NGOs; four from trade associations; and one each from a regulator and a consultancy.

Minor simplifications to regulators' handling of standard rules permits

8.3 Eleven respondents made specific comments on this proposal. One respondent in the waste sector and another in the water sector suggested that operators would continue to want notice of all types of changes to permits, irrespective of whether they were minor and administrative in nature. Another respondent in the waste sector commented that the existing system should remain. Two other respondents in the water sector and one local authority agreed; the relaxation could potentially allow the regulator to make changes, not just minor, to standard permits without consultation. There was a need to see the accompanying guidance to ensure there were necessary safeguards in place. One consultant commented that without being consulted on the changes, operators would not be in a position to confirm whether they would be able to comply with the proposed changes.

8.4 A trade association argued that the proposed change to regulation 26(3), allowing the regulator not to consult on revisions to standard permits where it considered them necessary to prevent serious pollution, could not be interpreted as a minor simplification. Nor could the proposed change to regulation 28(2)(c) which would mean that the

Environment Agency could decide to publish changes to the standard rules under regulation 26(5) with little or no warning provided to existing permit holders.

Government response

8.5 The proposal to adjust the requirement on regulators to consult where they wish to vary standard rules permits except where the changes are only minor and administrative in nature has clearly raised concerns with respondents. While the proposal would have introduced some flexibility for regulators, Government understands that greater re-assurance is needed to ensure that there are constraints around the use of such flexibility. Therefore, in the light of the responses, Government will not proceed with this amendment at the moment. Should the proposal be resurrected, there will be a need to consult on accompanying guidance that should explain the criteria more explicitly.

8.6 As there were no substantive comments on the proposal to allow new operators to apply for revised standard rules within the 3 month notification period, Government will proceed to make the amendment.

Simplifying requirements relating to landowner permission to clean up

8.7 Seven respondents made specific comments on this proposal. One respondent from the farming sector agreed that off-site condition consultation requirements could be extremely difficult to enforce and that most landowners would be in favour of a condition that would require a sewage undertaker to clear up sewage that escaped on to their land; and that the condition should be sufficiently broad to ensure its practicability. One respondent from the water sector questioned the need for the proposal, believing it possible to predict where sewage debris would be found in the event of an unacceptable overflow discharge. Another felt the proposal unclear as to whether its coverage extended beyond water discharge permits and that it could potentially increase the burden on Water and Sewerage Companies to use statutory powers to serve notices on third parties for access to land. A third respondent called for the regulations to clarify what the rights of access would be in relation to sewage debris clean up, suggesting that an additional clause was needed.

8.8 An NGO also asked for greater clarity on requirements relating to landowner permission to clean up. In its view, sewage discharges on to land were often ignored until a landowner took legal action to seek redress for contamination. Permission to clear up sewage discharge should not be seen as a way of avoiding responsibilities in terms of compensation to landowners and allowing continued discharges.

Government response

8.9 Government will proceed to make the amendment. There appears to have been some misunderstanding about the purpose of the proposal. Due to the nature of the sewage discharges, it is not possible for the Environment Agency/NRW to know at the time of the application for a permit which landowners or occupiers have to be consulted in relation to cleaning-up sewage debris. There could be a number of third parties on to whose land the water company or other operator may need to have access to clean-up

sewage debris but that would not be known until the discharge has occurred i.e. once the permit is granted and the water discharge activity operational.

Allowing flexibility in the service of notices

8.10 Five respondents made specific comments on this proposal. One local authority suggested widening the scope of the service of notices to include the individual applying for the permit who might be a specialist member of staff in larger businesses. Another respondent queried whether the scope could be extended to include partners for Limited Liability Partnerships. A respondent from the water sector sought diligence to be applied to ensure correspondence would be sent to the best known contact within a company, or to use the company secretariat as first default. Another suggested that companies should nominate a director on whom notices could be served. A fourth sought re-assurance that notices would not simply be posted to the site they related to but rather to the company's main office.

Government response

8.11 Several respondents sought assurance about the existing provisions on service of notices e.g. that notices must be sent to the main company office not just the site and that partners of an LLP would be served. The existing provisions are clear that notices must be served, in the case of a company, on the company secretary at the registered office; or, in the case of a partnership (which would include an LLP) on a partner or person having management control of the partnership business at its principal office. The service of notices could be by email.

8.12 Other suggestions included widening the provisions further to include nominated directors, permit applicants or best known contacts. Application forms already contain provision for the details of agents dealing with an application to be made known, for the purposes of routine correspondence about that application. The regulators would normally aim to correspond on routine matters with any person nominated by the applicant or permit holder.

8.13 As there were no substantive objections to the proposal, Government will proceed to make the amendment.

Correcting two oversights in respect of permit transfers

8.14 No respondent made a specific comment on this proposal.

Government response

8.15 Government will proceed to make the amendments.

Other comments

9.1 Three respondents noted that several amendments had already been made to the Environmental Permitting (England and Wales) Regulations 2010 with more in the pipeline. They urged Government to consolidate the EPR into one statutory instrument.

Government response

9.2 Government acknowledges the desirability of consolidating the EPR 2010 as amended and will seek to do so as soon as practicable.

10.1 If you have any queries about the consultation please contact: Eddie Bailey, Environmental Permitting, Defra, Room 631, Millbank, c/o Nobel House 17 Smith Square, London, SW1P 3JR (020 7238 6294) or e-mail eppadministrator@defra.gsi.gov.uk

Annex 1: List of respondents to the consultation

Test Valley Borough Council
Rossendale Borough Council
Calderdale Metropolitan Brough Council
Institute of Chemical Engineers Wales
Rushcliffe Borough Council
Bridgend County Borough Council
London Borough of Bromley
London Brough of Newham
East Cambridgeshire District Council
SITA
Blackpool City Council
Lancashire County Council
GSHP Association
Colchester Borough Council
London Borough of Merton
Chemical Industries Association
Harrogate Borough Council
SEPA
Ameycespa
United Utilities
Southern Water
Society of Motor Manufacturers and Traders
UKELA
NFU
Cambridgeshire County Council
Huntingdonshire County Council
Lafarge Tarmac
Holymoor
Yorkshire Water
The Law Society
Royal Borough of Greenwich
South West Water
Anglian Water
Institute for Architects
Motor Vehicles Dismantlers' Association
Network Rail
Mineral Products Association
Veolia
Leicestershire County Council
Historic Building Conservation
Chartered Institute of Environmental Health
Natural England
Country Land and Business Association
Merseyside Recycling and Waste Authority
Water UK
Fichtner GB
Viridor

Welsh LA EPR Group
Environmental Services Association
Thames Water
North Wales Shared Minerals and Waste Planning
Welsh Local Government Association
Birmingham City Council