

**Public Document Pack  
SOUTHEND-ON-SEA BOROUGH COUNCIL**

**Cabinet**

**Date: Tuesday, 19th September, 2017**

**Time: 2.00 pm**

**Place: Committee Room 1 - Civic Suite**

**Contact: Colin Gamble**

**Email: [committeesection@southend.gov.uk](mailto:committeesection@southend.gov.uk)**

**A G E N D A**

- 1 Apologies for Absence**
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- 3 Minutes of the Meeting held on Tuesday 20th June 2017**
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- 7 Quarter One Treasury Management Report**  
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- 19 Essex & Southend Waste Local Plan**  
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- 20 Council Procedure Rule 46**  
Report attached.
- 21 Minutes of the Grants Strategy Working Party held on Tuesday 5th September 2017**  
Minutes attached.

**Members:**

Cllr J Lamb (Chair), Cllr A Holland (Vice-Chair), Cllr T Byford, Cllr J Courtenay, Cllr T Cox, Cllr M Flewitt, Cllr A Moring and Cllr L Salter

## **SOUTHEND-ON-SEA BOROUGH COUNCIL**

### **Meeting of Cabinet**

**Date: Tuesday, 20th June, 2017**

**Place: Committee Room 1 - Civic Suite**

**Present:** Councillor J Lamb (Chair)  
Councillors A Holland (Vice-Chair), T Byford, J Courtenay, M Flewitt and L Salter

**In Attendance:** Councillors A Jones, C Mulroney and P Wexham  
J K Williams, S Leftley, A Lewis, A Atherton, J Chesterton, J Ruffle, C Gamble, F Abbott, T Row, E Cooney, N Corrigan, S Dolling, A Keating, T MacGregor, B Martin, J O'Loughlin and K Waters, A Rogers, C Burr and L Eddy.

**Start/End Time:** 2.00 - 4.15 pm

#### **60 Apologies for Absence**

Apologies for absence were received from Councillors Cox and Moring.

#### **61 Declarations of Interest**

(a) Councillor Mulroney – Minute 63 (Notice of Motion: Muscular Dystrophy and Mobility) – Non-pecuniary interest – close relative has muscular dystrophy;

(b) Councillor Holland – Minute 65 (In-Depth Scrutiny Report: Additional Enforcement Resources for Southend) – non-pecuniary interest – Vice-Chair of Essex Fire Authority and her son works for Essex Police; and Minute 74 (Housing Investment Company) – non-pecuniary interest – son works in the Department for People;

(c) Councillor Jones – Minute 79 (Provision of Secondary School Places) and Minute 89 (Provision of Secondary School Places in Southend: Free School Site) – non-pecuniary interest – has a child in secondary school;

(d) Councillor Wexham – Minute 80 (Tourism Strategy) – non-pecuniary interest – Chair of Community Coastal Team;

#### **62 Minutes of the Meetings held on Tuesday 14th March and 28th March 2017**

Resolved:-

That the Minutes of the Meetings held on 14<sup>th</sup> and 28<sup>th</sup> March 2017 be confirmed as a correct record and signed.

### **63 Notice of Motion - Muscular Dystrophy and Mobility**

At the meeting of Council held on 20<sup>th</sup> April 2017, Members received a Notice of Motion proposing that the Council supports the campaign by Muscular Dystrophy UK. The motion was proposed by Councillor Mulroney and seconded by Councillor Gilbert (this had been referred to Cabinet in accordance with standing order 8.4).

Members noted that there were concerns being expressed at a national level about the impact of the assessment criteria and people losing access to the enhanced level of Personal Independence Payments (PIP) to enable them to continue to fund a lease of a mobility vehicle. The Government's response to the second independent review of the PIP assessment is expected in due course.

Resolved:-

That the Deputy Chief Executive (People) be requested to write to the Minister of State for Disabled People, Health and Work to ask that the response to the second review covers the specific issues being raised by Muscular Dystrophy UK and similar groups.

Reason for Decision

To respond to the Notice of Motion

Other Options

None

Note:- This is an Executive Function  
Eligible for call in to People Scrutiny Committee  
Executive Councillor:- Salter

### **64 In-depth Scrutiny Final Report - Alternative Provision: Offsite Education Provision for Children & Young People**

The Cabinet considered a report of the Director of Legal & Democratic Services which presented the final report of the in depth scrutiny project 'Alternative provision – off site education provision for children and young people.'

In referring to the scrutiny report, the Executive Councillor for Children and Learning drew attention to the recommendations which he considered to be useful and helpful and conveyed his thanks and appreciation to Members and the relevant officers for their respective contributions towards the production of the report.

Resolved:

1. That the report and recommendations from the in depth scrutiny project attached at Appendix 1 to the submitted report, be approved.

2. That it be noted that the approval of any recommendations with budget implications will require consideration as part of future years' budget processes prior to implementation.

3. That, as a number of the recommendations require a multi-agency oversight/response, the Health and Wellbeing Board be asked to consider the report and ensure the actions are identified and monitored.

Reason for Decision

To achieve improved outcomes for children and young people.

Other Options

None.

Note:- This is an Executive function

**Called in to People Scrutiny Committee**

Executive Councillor : - Courtenay

**65 In-depth Scrutiny Final Report - To investigate the case for additional enforcement resources for Southend**

The Cabinet considered a report of the Director of Legal & Democratic Services which presented the final report of the in depth scrutiny project – 'To investigate the case for additional enforcement resources for Southend.'

On consideration of the report, the Chairman acknowledged the hard work undertaken by Members and the relevant officers in producing the report.

Resolved:

1. That the submitted report be noted.

2. That the proposals in the report be reviewed in the light of the cost implications.

Reason for Decision

To create a safe environment across the town for residents, workers and visitors.

Other Options

None.

Note:- This is an Executive function

**Called in to: Place Scrutiny Committee/Policy and Resources Scrutiny Committee**

Executive Councillor :- Holland

**66 Monthly Performance Report**

Resolved:

That the submitted report be noted.

Note: This is an Executive Function

**Referred direct and called in to all three Scrutiny Committees**

Executive Councillor: As appropriate to the item

**67 Corporate Plan and Annual Report**

The Cabinet considered a report of the Director of Transformation which presented the Council's draft Corporate Plan and Annual Report 2017.

Recommended:

That the Council's draft Corporate Plan and Annual Report 2017, be approved. ||

Reason for Decision

To ensure the Corporate Plan and Annual Report reflects the needs of the organisation and the borough's communities.

Other Options

None.

Note:- This is a Council Function

**Called in to Policy & Resources Scrutiny Committee**

Executive Councillor :- Lamb

**68 2016/17 Year End Performance Report**

The Cabinet considered a report of the Director of Transformation which presented the end of year position of the Council's corporate performance for 2016/17.

Resolved:

That the 2016/17 end of year position and accompanying analysis, be noted.

Reason for Decision

To note the Council's corporate performance for 2016/17.

Other Options

None.

Note:- This is an Executive Function

Eligible for call in to all three Scrutiny Committees

Executive Councillor:- Lamb

## **69 4th Tier/Group Manager Pay Review**

The Cabinet considered a report of the Director of Transformation which outlined proposals for a new grading structure at middle management (4<sup>th</sup> tier) level.

Resolved:

1. That a new Level 13 at a spot salary with a 90% development rate for the first 12 months in post, as set out in Appendix 2 to the submitted report, be approved.
2. That the deletion of the bottom point of Level 11 to remove the current overlap with Level 11, as set out in Appendix 2 to the report, be approved.
3. That the deletion of the bottom four points of Level 12 to remove the overlap with Level 11, as set out in Appendix 2 to the report, be approved.
4. That the implementation of the above resolutions through the relevant job evaluation processes/protocols be delegated to the Director of Transformation in consultation with the Chief Executive and the Executive Councillor for Corporate and Community Support Services.
5. That, in principle, a new developmental payment, as set out in Appendix 3 to the report, be approved.
6. That the development and implementation of this new payment be delegated to the Director of Transformation in consultation with the Chief Executive and the Executive Councillor for Corporate and Community Support Services.

Reason for Decision

The current pay structure for 4<sup>th</sup> tier (Group Manager) posts is no longer fit for purpose and impedes the Council's ability to recruit, retain and develop this critical group of managers.

Other Options

To leave the structure as it currently is. This will not address the issues outlined in the report and will impede the Council's ability to recruit, retain and develop this critical group of managers.

Note:- This is an Executive Function.

Eligible for call-in to Policy and Resources Scrutiny Committee.

Executive Councillor :- Moring

## **70 Annual Treasury Management Report - 2016/17**

The Cabinet considered a report of the Director of Finance and Resources detailing the treasury activity for the period from April 2016 to March 2017 and reviewed performance against the Prudential Indicators for 2016/17.

Recommended:

1. That the Annual Treasury Management Report for 2016/17 and the outturn Prudential Indicators for the period from April 2016 to March 2017, be approved.

2. That it be noted that the financing of capital expenditure of £48.475m has been funded in accordance with the schedule set out in Table 1 of Section 4 of the submitted report, with a reduced financing requirement of £6.639m.

3. That it be noted that Capital Financing and Treasury Management were carried out in accordance with statutory requirements, good practice and in compliance with the CIPFA (The Chartered Institute of Public Finance and Accountancy) Prudential Code during 2016/17.

4. That, in respect of the return on investment and borrowing, the following be noted:

(a) The loan and investment portfolios were actively managed to minimise cost and maximise interest earned, whilst maintaining a low level of risk.

(b) £1.2m of interest was earned during the whole of 2016/17 at an average rate of 1.45%. This is 1.25% over the benchmark of the average 7 day LIBID (London Interbank Bid Rate) and 1.12% over the average bank base rate.

(c) An average of £50.1m of investments were managed in-house. These earned £0.27m of interest during the year at an average rate of 0.54%. This is 0.34% over the average 7 day LIBID and 0.21% over the average bank base rate.

(d) An average of £9.8m of investments were managed by our former external fund manager. These earned £0.14m of interest during the year at an average rate of 1.37%. This is 1.17% over the average 7 day LIBID and 1.04% over the average bank base rate.

(e) During September 2016 £22.7m was recalled from our former external fund manager and £15m was invested equally across two short dated bond funds and £5m was invested into an enhanced cash fund.

(f) An average of £7.9m was managed by two short dated bond fund managers. This earned £0.14m since it was invested from a combination of an increase in the value of the units and income distribution, giving a combined return of 1.78%.

(g) An average of £2.5m was managed by an enhanced cash fund manager. This earned £0.02m since it was invested at an average rate of 0.86%.

(h) An average of £14.9m was managed by two property fund managers. This earned £0.67m during the year from a combination of an increase in the value of the units and income distribution, giving a combined return of 4.49%.

(i) The level of borrowing from the Public Works Loan Board (PWLB) (excluding debt relating to services transferred from Essex County Council on 1<sup>st</sup> April



1998) remained at the same level of £227.8m (Housing Revenue Account (HRA): £77.0m, General Fund (GF): £150.8m) throughout 2016/17.

(j) The level of financing for 'invest to save' schemes increased from £3.21m to £7.90m by the end of 2016/17.

#### Reason for Decision

To comply with the CIPFA Code of Practice for Treasury Management in the public sector and the CIPFA Prudential Code.

#### Other Options

None.

Note:- This is a Council Function

**Called in to: Policy & Resources Scrutiny Committee**

Executive Councillor:- Moring

## 71 **Capital Outturn Report 2016/17**

The Cabinet considered a report of the Director of Finance and Resources outlining the capital programme outturn for 2016/17 and sought approval for the relevant budget carry forwards, accelerated delivery requests and in-year amendments to the current approved programme.

On consideration of the report and, in the light of the recent tragic incident at the Grenfell tower block, the Chairman proposed the re-profiling of £2m from the 2018/19 HRA Future Programme into the 2017/18 financial year. This would enable the on-going programme of fire installation works to the tower blocks in the Borough to be accelerated and finished earlier than planned.

#### Recommended:

1. That it be noted that the expenditure on the capital programme for 2016/17 totalled £48.475m against a budget of £55.114m, a delivery of 88.0%.

2. That the relevant budget carry forwards and accelerated delivery requests totalling a net £5.363m, as set out in Appendices 1 and 2 to the submitted report, be approved.

3. That the virements, reprofiles and amendments and new external funding for schemes, as detailed in Appendices 3, 4 and 5 of the report, be noted.

4. That the relevant changes to the budget identified since the approved capital programme was set at Council on 23<sup>rd</sup> February 2017, as detailed in Appendix 6 to the report, be approved.

5. That it be noted that the above changes will result in an amended Capital Programme of £226.709m for the period 2017/18 to 2020/21, as detailed in Appendix 7 to the report.

6. That the re-profile of £2m from the 2018/19 HRA Future Programme budget into the 2017/18 financial year to enable the on-going programme of fire safety installation works to be accelerated, be approved.

Reason for Decision

To inform Members of the activity in 2016/17.

Other Options

None.

Note:- This is a Council Function

**Called in to: Policy & Resources Scrutiny Committee**

Executive Councillor:- Lamb

## 72 **Revenue Outturn Report 2016/17**

The Cabinet considered a report of the Director of Finance and Resources on the revenue outturn for 2016/17.

Recommended:

1. That the revenue outturn for the General Fund and HRA for 2016/17, be noted.

2. That the appropriation of revenue funds to and from earmarked reserves, as set out in paragraph 4.6 (General Fund) and paragraph 5.4 (HRA) of the submitted report, be approved.

Reason for Decision

To advise Members of the financial position of the Council and to approve the appropriation of funds to and from earmarked reserves.

Other Options

None.

Note:- This is a Council Function

**Called in to: Policy & Resources Scrutiny Committee**

Executive Councillor:- Lamb

## 73 **Council Debt Position**

The Cabinet considered a report of the Director of Finance and Resources informing Members of the current outstanding debt to the Council as of 31<sup>st</sup> March 2017 and debts that had been or are recommended for write-off in the current financial year.

Resolved:

1. That the current outstanding debt position as at 31<sup>st</sup> March 2017 and the position of debts written off to 31<sup>st</sup> March 2017, as set out in Appendices A and B to the submitted report, be noted.
2. That the write off as detailed in Appendix B to the report, be approved.

Reason for Decision

All reasonable steps to recover the debt have been taken and therefore where write off is recommended it is the only course of action available.

Other Options

None.

Note:- This is an Executive Function

Eligible for call in to: Policy & Resources Scrutiny Committee

Executive Councillor:- Moring

#### **74 Housing Investment Company**

The Cabinet considered a report of the Director of Finance and Resources setting out the key considerations, high level business case and the implementation plan for establishing a Housing Investment Company (HIC) for the Council.

Resolved:

1. That the establishment of a Council controlled, asset holding Housing Investment Company, be approved.
2. That the key actions within the Implementation Plan, be approved.
3. That External financial and legal advice be sought to support the key actions within the Implementation plan to ensure its timely delivery and that this one off cost is funded from the Council's contingency budget.

Reason for Decision

To address a number of local housing needs in the borough.

Other Options

None

Note:- This is an Executive Function.

**Called in to: Policy & Resources Scrutiny Committee**

Executive Councillor :- Lamb/Flewitt

## 75 RIPA Annual Report

The Cabinet considered a report of the Director of Legal and Democratic Services on the Council's use of the surveillance powers available to it under the Regulation of Investigatory Powers Act 2000 ("RIPA") during the financial year 2016/17 and provided an update on staff training on RIPA and the Council procedures relating to the use of social networking sites.

Resolved:

1. That it be noted that the Council has not used the surveillance powers available to it under RIPA between 1 April 2016 and the 31st March 2017 and neither has it used any covert human intelligence sources during this period.
2. That it be noted that training on RIPA for relevant staff was carried out on 5<sup>th</sup> April 2017.
3. That the guidance issued by the Office of Surveillance Commissioners (OSC) on the use of social networking sites and how this is addressed at the Council, be noted.

Reason for Decision

To comply with the Home Office Codes of Practice re RIPA.

Other Options

None

Note:- This is an Executive Function

Eligible for call in to: Policy & Resources Scrutiny Committee

Executive Councillor:- Moring

## 76 CYPP 2016/17 Annual Report/Children's Integration Plan

The Cabinet considered a report of the Deputy Chief Executive (People) which provided an update on the successes and achievements delivered through the Success for All Partnership Board (Success for All) and sought agreement for the Integrated Children's Strategy.

Recommended:

1. That the high level mobilisation plan and the successes and achievements as delivered by Success for All, be noted.
2. That the Integrated Children's Strategy, be approved.

Reason for Decision

With the development of an integrated children's strategy it is important that the Council formally approves the strategy to ensure senior support and sponsorship.

Other options

None

Note: This is a Council Function.

Eligible for call in to: People Scrutiny Committee

Executive Councillor: Courtenay

**77 School Admission Arrangements for Community Schools and Coordinated Admission Scheme for Academic Year 2018/19**

The Cabinet considered a report of the Deputy Chief Executive (People) which sought views on the proposed pre-consultation and engagement of the relevant people in respect of the admission arrangements (including catchment areas) for community schools for the academic year 2019/20.

Resolved:

1. That a two level consultation with relevant people on the proposals for Admission Arrangements for community schools for the academic year 2019/20, be approved.

2. That the pre-consultation and engagement phase, from July 2017 through to September 2017, be approved.

3. That formal consultation in line with the Admissions Code 2014, from October to January 2018, be approved.

4. That consultation takes place with governing bodies of community schools on the published admission numbers for community infant, junior and primary schools for September 2018 (this might be earlier than usual in order to support the full consultation process - October to 31<sup>st</sup> January 2018), be approved.

Reasons for Decision:

To undertake consultation on the catchment areas and arrangements.

Other Options

None.

Note:- This is an Executive Function

**Called in to: People Scrutiny Committee**

Executive Councillor: Courtenay

**78 Grammar School (Strategy)**

The Cabinet considered a report of the Deputy Chief Executive (People) detailing the proposals for a strategy to fulfil an ambition to enable more Southend residents to attend one of the four Grammar Schools in the borough.

Resolved:

1. That the outline proposals for the Strategy, be noted.
2. That the types of actions set out in Appendix 1 to the submitted report which will form the basis of the Strategy, be approved.

Reasons for Decision:

To improve the representation of Southend residents so that they can benefit from a selective education, if it is suitable for their particular abilities.

Other options

None.

Note:- This is an Executive Function.

**Called in to: People Scrutiny Committee**

Executive Councillor: Courtenay

## **79 Provision of Secondary School Places**

The Cabinet considered a report of the Deputy Chief Executive (People) detailing progress on the strategy for the provision of secondary places, as overseen by the School Places Working Party and sought consideration of the proposal for a Free School.

Resolved:

1. That current progress be noted and that the progression of expansion projects to procurement stage at good and outstanding secondary schools for September 2018, namely Shoeburyness High School and St Thomas More High School, be approved.
2. That the continuation of expansion discussions with remaining Good and Outstanding Schools, namely Belfairs Academy, The Eastwood Academy and St Bernard's High School to secure the remaining 60 places still required for September 2018, be approved.
3. That it be agreed that a free school is required for September 2019 for the required additional 180 places (this requires the identification of council owned land to support any application to the Department of Education).

Reasons for Decision:

The Council has a statutory duty to ensure sufficient places for all statutory school aged children.

Other options:

None.

Note: This is an Executive Function

**Called in to: People Scrutiny Committee**

Executive Councillor: Courtenay

**80 Tourism Strategy**

The Cabinet considered a report of the Deputy Chief Executive (Place) detailing progress with the development of Southend-on-Sea's Tourism.

Recommended:

That the Destination Southend – 2017 Tourism Strategy, be adopted. ||

Reasons for Decision:

To adopt the Strategy.

Other options:

None.

Note:- This is a Council Function

**Called in to: Place Scrutiny Committee**

Executive Councillor: Holland

**81 Digital Strategy**

The Cabinet considered a report of the Deputy Chief Executive (Place) detailing the Council's strategic digital intentions for the next three years set out in the 'Digital Strategy 2017/20.'

Recommended:

1. That the strategic direction contained within the 'Digital Strategy 2017/20', be approved. ||

2. That SMART proof of concept pilots be progressed across 2017/18.

3. That the £500,000 identified in the Council's Capital Programme 2018/19 be brought forward for use in 2017/18 for the creation of the Intelligence Hub. ||

Reasons for Decision:

To adopt the Strategy.

Other options:

None.

Note:- This is a Council Function

**Called in to: Place Scrutiny Committee**

Executive Councillor: Byford.

## 82 **Growth Strategy**

The Cabinet considered a report of the Deputy Chief Executive (Place) on the development of an Economic Growth Strategy 2017-22.

Resolved:

That, subject to the inclusion of Shoebury High Street and Ness Road in the list of retail/commercial areas (page 22 of the Strategy), the Economic Growth Strategy, be approved.

Reasons for Decision:

To provide a clear method to steer Council activity and decision making in order to maximise the economic benefits realised by Southend residents.

Other Options

To develop an alternative strategy.

Note: This is an Executive Function

**Called in to: Place Scrutiny Committee**

Executive Councillor: Holland

## 83 **The Official Feed & Food Service Plan**

The Cabinet considered a report of the Deputy Chief Executive (Place) which sought agreement to the Official Feed and Food Control Service Plan 2017-18 required by the Food Standards Agency.

Recommended:

That the official Feed and Food Control Service Plan 2017-18, as set out in Appendix 1 to the submitted report, be approved. ||

Reasons for Decision:

To comply with the Food Standards Agency Framework Agreement.

Note: This is a Council Function

Eligible for call in to: Place Scrutiny Committee

Executive Councillor: Cox

## 84 **Community Infrastructure Levy**

The Cabinet considered a report of the Deputy Chief Executive (Place) providing the CIL Annual Financial Report for the financial year 2016/17 together with an update in respect of the allocation and expenditure of CIL funding.

Resolved:

1. That the content of the CIL Annual Financial Report 2016/17 (including Appendix 1 to the submitted report) be noted and that the CIL Main Fund receipts to date be carried forward to the next financial year (2018/19), when spending will be reviewed.



2. That the authority to agree how the Ward Neighbourhood Allocation (excluding allocation to Leigh Town Council area) is to be spent be delegated to the Deputy Chief Executive (Place), in consultation with Ward Members and the Executive Councillor for Housing, Planning and Sustainability.

Reasons for Decision:

As more significant CIL receipts are anticipated over the next year it is considered more beneficial to wait until these receipts are received before deciding how to apply them to infrastructure projects.

Other options:

As set out in the submitted report.

Note: This is an Executive Function  
Eligible for call in to: Place Scrutiny Committee  
Executive Councillor: Flewitt

**85 Minutes of the Senior Managers Pay Panel held on Tuesday 6th June 2017**

The Cabinet considered the recommendations of the Senior Managers Pay Panel held on 6<sup>th</sup> June 2017.

Resolved:-

1. That a pay award of 1% be applied to the Council's senior management grades with effect from 1<sup>st</sup> April 2017.

2. That, with effect from 1<sup>st</sup> April 2017, the statutory allowances paid to the Director of Finance & Resources (S.151), Director of Legal & Democratic Services (Monitoring Officer) and the Deputy Chief Executive – People (DCS & DAS) be increased from £7,685 p.a. to £7,850 p.a.

3. That the annual allowance paid to the Director of Integrated Commissioning be increased from £5,000 p.a. to £7,500 p.a. This allowance is to be paid quarterly subject to the successful delivery of key targets as agreed by the Council and the Clinical Commissioning Group (CCG).

Note:- This is an Executive Function  
Eligible for call in to: Policy and Resources Scrutiny Committee  
Executive Councillor:- Lamb

**86 Standing Order 46**

Resolved:-

That the submitted report be noted.

Note:- This is an Executive Function  
**Called in to all three Scrutiny Committees as appropriate to the item**  
Executive Councillor:- As appropriate to the item

## 87 Exclusion of the Public

Resolved:-

That, under Section 100(A)(4) of the Local Government Act 1972, the public be excluded from the meeting for the items of business set out below, on the grounds that they would involve the likely disclosure of exempt information as defined in Part 1 of Schedule 12A to the Act and that the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

## 88 Gasworks Site

The Cabinet considered a joint report of the Deputy Chief Executive (Place) and Director of Finance and Resources on the above.

Resolved:-

1. That the acquisition of the former Gasworks site, noting the strategic opportunities, the risks and the associated financial implications, be pursued.
2. That the use of the land, subject to planning, for parking in the short-medium term with a view to developing a scheme for part or all of the land in the medium-long term based on the strategic and development opportunities outlined in the submitted report, be approved.
3. That the authority to settle the terms and complete the transaction within the financial parameters as set out in sections 5 and 10.2 of the submitted report be delegated to the Deputy Chief Executive (Place) in consultation with the Leader of the Council and the Director of Finance and Resources.
4. That the impacts on other sites be noted and the reasons for the recommendations set out at sections 6 and 9 of the report, be approved.
5. That the financial implications and amendments required to the Capital Programme and use of reserves as set out in the report, be approved.
6. That any necessary procurement and planning activities to enable the remediation and development of the site to proceed in both the short-medium and medium-long term, be approved.

Reason for Decision

As set out in the submitted report

Other Options

As set out in the submitted report

Note:- This is an Executive Function

**Called in to: Place Scrutiny Committee**

Executive Councillor:- Holland

**89 Provision of Secondary School Places in Southend September 2019:  
Proposed Free School Site**

The Cabinet considered a report of the Deputy Chief Executive (People) on the above.

Resolved:-

1. That the preferred site for a free school to support and strengthen an application made by a proven academy trust to the Department for Education (DfE), be approved.

2. That further legal advice be sought on the Council's rights to terminate any tenancy agreement, to better understand the potential costs involved, and to assess the likelihood of entering into negotiations with the tenant and obtaining planning permission regarding change of use of the land.

Reason for Decision

As set out in the submitted report

Other Options

As set out in the submitted report

Note:- This is an Executive Function

**Called in to: People Scrutiny Committee**

Executive Councillor:- Courtenay

**Chairman:** \_\_\_\_\_

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# Southend-on-Sea Borough Council

Agenda  
Item No.

Report of Deputy Chief Executive (Place)

to  
**Cabinet**

on

**19<sup>th</sup> September 2017**

Report prepared by: Andrew Lewis, Deputy Chief Executive  
(Place)

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## Fire Safety Measures following the Grenfell Tower Tragedy

**Place Scrutiny Committee**  
**Executive Councillor: Councillor Flewitt**  
**Part 1**

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### **1. Purpose of Report**

- 1.1 To advise Members of the action the Council has taken following the Grenfell Tower fire tragedy.

### **2. Recommendations**

- 2.1. **That Members note the action taken to date.**
- 2.2. **To note that a further report will be submitted to Cabinet detailing the outcomes of the first phase of the Fire Safety review being undertaken by the Council, South Essex Homes and Essex Fire & Rescue Service**
- 2.3. **Agree that there is consideration in the Capital Budget proposals for 2018/19 to fund any necessary remedial work or fire safety improvements that are identified by the review in recommendation 2.2 above.**

### **3. Background**

- 3.1. The Grenfell Tower fire tragedy occurred on 14<sup>th</sup> June 2017: Grenfell Tower is a twenty four storey block of public sector flats in the Royal Borough of Kensington & Chelsea.
- 3.2. The fire, which is under investigation and the subject of a Public Inquiry, is known to have caused at least eighty deaths. An independent review of Building Regulations and fire safety measures has also been established.
- 3.3. The rapid acceleration in the spread of the fire and its intensity is thought to have been caused by the building's external cladding which was constructed from Aluminium Composite Material (ACM) which is commonly used to clad the exterior of buildings.

- 3.4. In the immediate aftermath of the Grenfell Tower tragedy the Leader of Southend-on-Sea Borough Council said that the Council would be reviewing fire safety measures across its estate – in order to progress this the Acting Chief Executive established an internal working group, including senior representation from South Essex Homes (SEH), to oversee and co-ordinate this work.
- 3.5. At the meeting of the Full Council on 15<sup>th</sup> June the Council stood for a one minute silence as a mark of respect for all those affected by the Grenfell Tower tragedy as well as the recent terror attacks in Manchester and London.
- 3.6. At their meeting on 20<sup>th</sup> June, Cabinet considered a report of the Director of Finance & Resources outlining the capital programme outturn for 2016/17. On consideration of the report and in light of the Grenfell Tower tragedy, the Leader of the Council proposed the re-profiling of £2M from the 2018/19 HRA Future Programme into the current 2017/18 financial year. This would enable the existing on-going programme of fire installation works to the Council's tower blocks to be accelerated and completed earlier than planned and within this financial year.

#### **4. Discussion & Proposals**

- 4.1 Members and particularly residents will be reassured to know that none of the Council's tower blocks have external cladding fitted.
- 4.2 In addition to this every Council owned high rise block and sheltered housing scheme across the borough has an annual fire risk assessment carried out by a qualified assessor. Essex Fire and Rescue Service (EFRS) also carry out their own annual audits and the results are recorded.
- 4.3 Actions recommended as a result of these assessments are carried out by South Essex Homes as a matter of urgency. This comprehensive approach ensures buildings remain compliant with the most up to date regulatory and legislative requirements and also good practice as advised by EFRS.
- 4.4 SEH's compliance officer carries out interim visits to inspect the blocks during the year in order to ensure compliance is maintained. Caretaking and estate staff attend all high rise blocks seven days a week and part of that attendance is to ensure all lifts, stairs and communal areas are clean and clear of any dumped objects or materials. Any dumped item is removed as promptly as possible so as to avoid any risk of fire in communal areas.
- 4.5 With regard to specific fire safety installations in high rise blocks SEH have been carrying out a programme of replacing all front entrance doors and frames, along with all communal doors and panels, with the highest specification products available on the market. These have proved to be completely effective in preventing the transmission of smoke and fire where fire has occurred. They enable the fire service recommended policy, for tenants to remain in their home in the event of a fire outside, to be fully effective in protecting residents.
- 4.6 Of the 13 high rise blocks in Southend, 10 have had these works completed, one block is currently in the process of having this work carried out and the remaining two blocks are planned to have the work carried out in this financial

year following Cabinet's approval on 20<sup>th</sup> June to bring forward £2m of capital funding as set out earlier in this report.

- 4.7 In addition each high rise block has a sprinkler system installed in the ground floor refuse chamber, as these are areas where low level fires have occurred in the past, and which have proved to be very effective.
- 4.8 Every Council tenanted property also has an individual hard wired smoke detector which is checked and serviced on an annual basis and SEH are currently in the process of installing individual reminder signs to the back of each tenanted property's entrance door to further remind residents of fire safety action in the event of a fire.
- 4.9 At national level the Department for Communities & Local Government (DCLG) wrote to all Local Authorities to establish the numbers of high rise / tall buildings in their management that had ACM cladding attached to them. They also provided Local Authorities with access to the Building Research Establishment at Garston in Hertfordshire where they were able to send samples of cladding that could be tested for combustibility – the Council has not needed to use this facility.
- 4.10 The Council has responded fully to all information requests from Government and no issues have been raised by Government as a result of the Council's returns.
- 4.11 As a result of the Grenfell Tower fire the Council has initiated a number of actions which are set out below:
- Assessments have been undertaken by SEH on all their residential tower blocks.
  - Fire safety measures are being reviewed across the Council's property estate – this includes all properties managed by SEH, as well as the Civic Centre, leisure and cultural buildings and schools.
  - The Council has been in direct contact with other public sector partners (including the NHS, the University of Essex and South Essex College) who have high rise / tall buildings in their stock to request that they reassure themselves about fire safety measures and external cladding. No safety issues have arisen from this that the Council is aware of.
  - The Council has written to Housing Associations with high rise / tall buildings in the borough to reassure themselves that there are no external cladding issues that would be a cause for concern and that they are reviewing fire safety measures in place in light of the Grenfell Tower fire.
  - The Council has contacted all schools to provide support and assistance should they require it. The Department for Education has written to schools in respect of risk assessment policies – the Council is assisting the schools it

is directly responsible to support them reviewing their own fire safety arrangements.

- In addition to this the Council has researched its planning and building control records to establish a list of high rise / tall buildings that have external cladding attached to them. This list has been shared with the Fire Service and cross referenced with the records that they hold – a total of forty eight buildings have been identified as a result 12 of these are clad. The Council has written to DCLG to seek their advice to establish Government's expectations of Local Authorities liaising with private sector property owners. As a result of this dialogue with DCLG the Council is in the process of writing to all private sector property owners identified by its review to encourage them to reassure themselves that they have appropriate fire safety measure in place – this relates to both external cladding and internal measures and procedures to manage fire safety matters.
- A Tri – partite Fire Safety review has been commissioned by the Council, SEH and EFRS. It is proposed that this will review the current fire safety practices, procedures and policies in place in relation to the Council's property portfolio including the housing stock and make recommendations for updates in the light of the emerging lessons from the Grenfell Tower tragedy and the independent review of Building Regulations and Public Inquiry referred to earlier in this report. The outcome of this review will be reported back to Cabinet in due course. The review will also consider the Council's own emergency response plans and its ability to manage an incident of this magnitude in the future.

## **5. Other Options**

- 5.1 Realistically there are no practical alternatives to the measures the Council has put in place following the Grenfell Tower fire – in situations such as these it is important for the Council to take on and exercise its community leadership role and do its best to ensure that appropriate fire safety measures are in place for all buildings in the borough and reassure residents that their safety is of paramount importance.

## **6. Reasons for Recommendations**

- 6.1 To reassure Members that the Council has reviewed fire safety management measures across its own property portfolio as well as discharge its community leadership role and seek assurance from other public and private sector building owners that they are also reviewing safety measures.  
It is also important that the Council puts in place appropriate levels of capital funding to ensure that any necessary improvement measures that result from the review can be addressed.

## **7. Corporate implications**

### **7.1 Contribution to Council's vision & corporate priorities**

### **7.2 Financial implications**



Once the results of the fire safety review are known then it will be clearer on the level of capital funding required to carry out the resultant action plan.

As part of the budget setting process for 2018/19 Members will need to consider the level of funding required as part of any capital budget proposal. If there is a need for any urgent action prior to the next financial year this will need to be met from existing Health & Safety budgets and if necessary the Council's contingency and/or reserves depending on the amount required.

### **7.3 Legal implications**

There are legal responsibilities on building owners to ensure that their buildings comply with fire safety legislation, building regulations and health and safety legislation. It is also highly likely that additional legislative responsibilities will result from the Public Inquiry and from the Independent Review of Building Regulations and Fire Safety

### **7.4 People implications**

The most important implication is to provide reassurance to people who live, or indeed work, in high rise / tall buildings across the borough that fire safety measures in those buildings are appropriate.

### **7.5 Property implications**

The review will consider fire safety measures across the Council's property portfolio – as a result there are likely to be improvement measures that will need to be undertaken and which will be subject to a future report to Cabinet.

### **7.6 Consultation**

The measures set out in this report have not been subject to consultation but the Council has liaised closely with Essex Fire & Rescue Service, other public sector partners and is writing to private sector building owners in respect of external cladding materials and fire safety measures.

### **7.7 Equality & Diversity implications**

There are equality and diversity implications particularly in relation to fire safety measures in tower blocks and these will be fully considered as part of the tri partite review of the Council's property portfolio – it includes things like fire evacuation procedures for people with mobility difficulties, warning measures for people with visual and / or hearing impairments, and the location and storage of mobility scooters for example.

### **7.8 Risk Assessment**

The measures set out in this report are designed to ensure that appropriate risk assessments are in place and that they are subject to review as a result of the Grenfell Road fire.

## 7.9 **Value for Money**

It is important that all fire safety measures are carried out in the best interest of residents, Council staff and the public and that any works undertaken will be through the appropriate procurement process to ensure value for money. In addition, it will be important for any necessary works to be undertaken for insurance purposes to ensure that the Council is protected financially.

## 7.10 **Community Safety implications**

The measures set out in this report are entirely consistent with the Council's community safety responsibilities and priorities.

## 7.11 **Environmental implications**

There are no additional environmental implications as a result of this report.

## 8. **Background Papers**

8.1 None

## 9. **Appendices**

9.1 None

# Southend-on-Sea Borough Council

Agenda  
Item No.

Report of Chief Executive  
to  
Cabinet

on  
19 September 2017

Report prepared by: Veronica Dewsbury  
Group Manager Benefits

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**Risk based Verification Policy**  
**Policy and Resources Scrutiny Committee**  
**Executive Councillor: Councillor Moring**  
***A Part 1 Public Agenda Item***

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**1. Purpose of Report**

To introduce a policy for risk based verification within the benefits service.

**2. Recommendation**

That Cabinet agree the implementation of the Risk Based Verification Policy attached at Appendix 1.

**3. Background**

- 3.1 The Council's benefit service strives to prevent and detect fraud and error within both housing benefit and the local council tax support scheme. We continually look for new ways to improve and drive down fraud and error.
- 3.2 Certain circumstances within a household carry a higher risk of fraud and error. Currently we verify all new claims to the same level regardless of household composition or circumstances.
- 3.3 Failure to declare earnings and employment continues to be the main cause of fraud and claimant error overpayments of Housing Benefit. We have a large number of claimants who are regularly in and out of work, or on zero hour's contracts or self Employed. These claims are at the highest risk of receiving incorrect housing benefit payments.
- 3.4 The Government has launched a new scheme, Right Benefit Initiative, which aims to remove fraud and error from the housing benefit scheme. This will be achieved both through regular updates from HMRC and robust screening of high and medium risk claims.

## 4. Risk Based Verification

- 4.1 Adopting a risk based verification policy will allow the benefits team to fast track low risk claims, freeing up resource needed to introduce telephone and face to face interviews for claims identified as high risk. The policy must be in place before any such approach can be adopted.
- 4.2 Risk based verification is applied through the use of software provided by the Revenues and Benefits system provider. Parameters are built within the system detailing incomes and/or circumstances that are considered high, medium and low risk. When staff then input a claim the software will use these parameters to determine the risk level. This determines the level of evidence required for that claim.
- 4.3 For the purposes of applying verification on a risk basis, each claim is ranked into one of three categories; these categories are Low, Medium and High Risk.

**Low Risk** - The only checks to be made on cases classed as low risk are proof of identity, production of a National Insurance Number and, if they are a student, formal confirmation.

**Medium Risk** - Cases in this category must have the same checks as low risk plus for every type of income or capital declared, documentation proof is required. The documentation can be photocopies or scanned images through email as originals are not required in this instance.

**High Risk** - All high risk categorised cases must have the same checks as low risk and documentation provided for each declared type of income or capital; however the documents must be **original and verified** by trained staff.

- 4.4 This approach is in operation in many other Local Authorities and has proved to be effective.
- 4.5 There will be no negative impacts on the customer service centre as all interviews and contacts required will be undertaken by the Benefits Service. In fact the amount of scanning required should decrease as low risk cases will not be asked to submit evidence.
- 4.6 Benefit and internal audit staff have been involved in the development of this policy through workshops and meetings. We have also consulted with other Essex Authorities that already operate a risk based verification solution to learn from their experiences.
- 4.7 A formal audit of the system and policy is on the audit annual plan should the policy be adopted.

## 5. Other Options

We could continue to work as we are but this would not free up the additional resources required to do the additional checks.

We have considered recruiting additional resource but there is insufficient funding to make this viable, however, the automated approach being proposed is for a better solution.

## **6. Reasons for Recommendations**

To improve performance in reducing fraud and error leading to additional Government funding through the Right Benefit initiative.

## **7. Corporate Implications**

### 7.1 Contribution to Council's Vision & Corporate Priorities

### 7.2 Financial Implications

The financial implications will be positive when the policy is in operation. By signing up to the Right Benefit initiative we will receive £47k in set up funding. Post set up the additional funding received will depend on the level of reduction in housing benefit payments.

The adoption of this policy will allow staff to prioritise the higher risk claims and therefore will lead to reduced fraud and error and consequently improved Housing Benefit funding.

### 7.3 Legal Implications

The policy must be formally adopted by the Council for the risk based verification approach to be accepted by external auditors operating the subsidy audit.

### 7.4 People Implications

None

### 7.5 Property Implications

None

### 7.6 Consultation

None

### 7.7 Equalities and Diversity Implications

### 7.8 Risk Assessment

There are no identified risks in adopting the policy but a full risk assessment will be completed during the workshops to identify the risk criteria to be used as part of the scheme.

### 7.9 Value for Money

The policy will enable more efficient use of staff resources and should mean more Housing Benefit subsidy.

7.10 Community Safety Implications

None

7.11 Environmental Impact

None

**8. Background Papers**

DWP Guidance

**9. Appendices**

Appendix A - Risk Based Verification Policy

## Appendix 1



### **Revenues & Benefits Risk Based Verification Policy - New Claims September 2017**

## Introduction

The aim of this policy is to facilitate a system which will support a tailored regime targeted at preventing fraud and error from entering the benefit system. The target date for implementation is 1st June 2017. The policy is designed to meet the DWP criteria of risk based assessment in respect of new Housing Benefit and Local Council Tax Support claims

## Background

Southend on Sea Borough Council must adhere to Housing Benefit and Local Council Tax Support legislation. The regulations within the legislation do not specify what information and evidence they should obtain from a benefit customer, however, they do require an authority to have information which allows an accurate assessment of a claimant's entitlement when a claim is first made.

Housing Benefit Regulation 86 states (LCTS equivalent is 72);

*"a person who makes a claim, or a person to whom housing benefit has been awarded, shall furnish such certificates, documents, information and evidence in connection with the claim or the award, or any question arising out of the claim or the award, as may reasonably be required by the relevant authority in order to determine that person's entitlement to, or continuing entitlement to housing benefit and shall do so within one month of being required to do so or such longer period as the relevant authority may consider reasonable."*

Furthermore; Section 1 of the Social Security (Administration) Act 1992 dictates a National Insurance number must either be stated or enough information provided to trace or allocate one. This legislation applies to both customers and their partners.

*(1A) No person whose entitlement to any benefit depends on his making a claim shall be entitled to the benefit unless subsection (1B) below is satisfied in relation both to the person making the claim and to any other person in respect of whom he is claiming benefit*

*(1B) this subsection is satisfied in relation to a person if—*

*(a)The claim is accompanied by—*

*(i)a statement of the person's national insurance number and information or evidence establishing that that number has been allocated to the person; or*

*(ii)information or evidence enabling the national insurance number that has been allocated to the person to be ascertained; or*

*(b)the person makes an application for a national insurance number to be allocated to him which is accompanied by information or evidence enabling such a number to be so allocated.*

Given those requirements are at the core of the process of administering claims these shall be adhered to at all times.



## The system

For the purposes of applying verification on a risk basis, each claim is ranked into one of three categories; these categories are Low, Medium and High Risk. The table at Appendix 1 shows the level of verification required for each the risk grouping. A national Insurance number and identity confirmation **must be made in all cases** irrelevant of the risk grouping; this is to comply with aforementioned legislation.

**Low Risk** - The only checks to be made on cases classed as low risk are proof of identity, production of a National Insurance Number and, if they are a student, formal confirmation.

**Medium Risk** - Cases in this category must have the same checks as low risk plus for every type of income or capital declared, documentation proof is required. The documentation can be photocopies or scanned images through email as originals are not required in this instance.

**High Risk** - All high risk categorised cases must have the same checks as low risk and documentation provided for each declared type of income or capital; however the documents must be **original and verified** by trained staff.

Furthermore all cases shown to be high risk may be subject to one of more of the following additional checks;

☐ Home visit to verify residency

☐ Office based interview

☐ Credit Reference Check (CRA) completed to determine if there are any discrepancies between the information provided by the customer on a claim form and the information available via CRA checks.

## Recording & Monitoring

Southend on Sea Borough Council has a minimum of 4% blind sampling which means cases from lower categories will automatically be chosen to test the software assumptions. This information can be fed back into the propensity models supporting the parameters of the Risk Based Verification Portal. Cases cannot be downgraded at anytime by an assessment officer, but they can be increased with approval from a Senior Officer. All cases which are upgraded are recorded along stating reasons. This information can then be fed through to the parameters if errors are found.

Risk Based Verification uses software which will analyse the details of each new claim in order to place the claim in a risk category. The flexibility of RBV will also allow this council to take into account local issues and build in checks and balances. Different levels of checks to benefit claims will depend on a complex mathematical risk profile given to each customer. This in effect means being able to target activity toward checking those cases deemed to be at highest risk of involving fraud and/or error. The purpose of Risk Based Verification is to increase the levels of fraud and error

detected by focusing resource appropriately. The profile for identifying risk at the new claim stage uses a different set of rules to those applied within a claim period.

Southend on Sea Borough Council will monitor the numbers of claims verified as low, medium or high risk on a quarterly basis using IT tools available. This monitoring will ensure that no more than 55% of claims are assessed as low risk, with around 25% as medium risk and 20% high risk. The monitoring reports will show the level of splits by percentage and the level of fraud across the authority in comparison to its baseline of 5%. This detection level will also be split across the areas of Low, Medium and High Risk. Information will be derived from cells 222 and 231 within the SHBE extract file in order to be able to produce statistical data.

**Verification for NEW CLAIMS**

An analysis of the likely impact RBV will have on new claims has already been completed. We have identified at local level the demographic of our client base more likely to produce a high risk result. The claims falling into this category are predominantly those made by the employed working age. Employed working age claimants represent 35% of all new claimants. Within this group 71% of all claims have produced either a medium or high risk score. As a result of this local intelligence we will continue to apply the top levels of verification (medium or high verification criteria) to the customer potentially posing the higher risks via the new claim appointment. We can then simplify the claim procedure for the section of the customer base that is more likely to fall into the low risk group. The majority of low risk claims are made by customers in receipt of income support, jobseekers allowance, employment support allowance or pension credit. This section of the customer base currently makes up 60% of all new claims. The analysis already completed has confirmed that 65% of claims within this group are low risk and require no verification at all.

This Policy has been produced in line with Department of Work and Pensions guidance on the use of Risk Based Verification circular S11/11, Appendix 2.

**Group Manager Benefits**

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**Group Manager Revenues**

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**Group Manager Customer Services**

.....

**Section 151 Officer**

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Issue to be verified	Sub-category of evidence	Low Risk	Medium Risk	High Risk
Identity and s19	Identity	Originals or photocopies	Originals or photocopies	Originals required
	S19	Originals or photocopies	Originals or photocopies	Originals required
Residency and/or rent	Private tenants		Originals or photocopies	Originals required Optional visit Optional interview
	Social tenants		Originals or photocopies	Originals required Optional visit Optional interview
	Registered		Originals or photocopies	Originals required Optional visit Optional interview
Household composition	Partner ID/s19/income/capital	Originals or photocopies	Originals or photocopies	Originals required Optional visit Optional interview
	Dependants under 18		Originals or photocopies	Originals required Optional visit Optional interview
	Non-dependants remunerative work		Originals or photocopies	Originals required Optional visit Optional interview
	Non-dependants passported benefit			Optional visit
	Non-dependant student		Original or photocopies	Originals required Optional visit
	Non-dependant not in remunerative work/other		Original or photocopies	Originals required Optional visit
Income	State Benefits			
	Earnings/SMP/SSP		Originals or photocopies	Originals required
	Self Employed earnings		Originals or photocopies	Originals required
Child care costs			Originals or photocopies	Originals required
Student status	Income also required	Originals or photocopies	Originals or photocopies	Originals required
Capital	Below capital limit		Originals or copies if over £5500 for working age or over £9500 for pensioners	Originals required of all capital accounts and investments
	Above lower capital limit		Originals or photocopies	Originals required
	Property		Originals or	Originals required

			photocopies	
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# Southend-on-Sea Borough Council

Agenda  
Item No.

Report of Chief Executive  
to  
Cabinet  
on  
19 September 2017

Report prepared by: Joe Chesterton  
Director of Finance and Resources

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**Quarter One Treasury Management Report – 2017/18**  
**Policy and Resources Scrutiny Committee**  
**Executive Councillor: Councillor Moring**  
***A Part 1 Public Agenda Item***

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## 1. Purpose of Report

- 1.1 The Quarter One Treasury Management Report covers the treasury management activity for the period from April 2017 to June 2017 and compliance with the treasury management strategy for that period.

## 2. Recommendations

That the following is approved:

- 2.1 The Quarter One Treasury Management Report for 2017/18.

That the following is noted:

- 2.2 Treasury management activities were carried out in accordance with the CIPFA (The Chartered Institute of Public Finance and Accountancy) Code of Practice for Treasury Management in the Public Sector during the period from April to June 2017.
- 2.3 The loan and investment portfolios were actively managed to minimise cost and maximise interest earned, whilst maintaining a low level of risk.
- 2.4 An average of £48.6m of investments were managed in-house. These earned £0.052m of interest during this three month period at an average rate of 0.43%. This is 0.32% over the average 7-day LIBID and 0.18% over the bank base rate.
- 2.5 An average of £5.0m was managed by an enhanced cash fund manager. This earned £0.006m during this three month period at an average rate of 0.52%.

- 2.6 An average of £15.2m was managed by two short dated bond fund managers. This earned £0.046m during this three month period from a combination of an increase in the value of the units and income distribution, giving a combined return of 1.21%.**
- 2.7 An average of £15.9m was managed by two property fund managers. These earned £0.403m during this three month period from a combination of an increase in the value of the units and income distribution, giving a combined return of 10.14%.**
- 2.8 The level of borrowing from the Public Works Loan Board (PWLB) (excluding debt relating to services transferred from Essex County Council on 1<sup>st</sup> April 1998) remained at the same level of £227.8m (HRA: £77.0m, GF: £150.8m) during the period from April to June 2017.**
- 2.9 During the quarter the level of financing for ‘invest to save’ schemes increased from £7.90m to £8.75m.**

### **3. Background**

- 3.1 This Council has adopted the ‘CIPFA Code of Practice for Treasury Management in the Public Sector’ and operates its treasury management service in compliance with this code. The code recommends that local authorities submit reports regularly as part of its Governance arrangements.
- 3.2 Current guidance is that authorities should report formally at least twice a year and preferably quarterly. The Treasury Management Policy Statement for 2017/18 set out that reports would be submitted to Cabinet quarterly on the activities of the treasury management operation. This is the first quarterly report for the financial year 2017/18.
- 3.3 Appendix 1 shows the treasury management position at the end of quarter one of 2017/18.
- 3.4 Appendix 2 shows the treasury management performance specifically for quarter one of 2017/18.

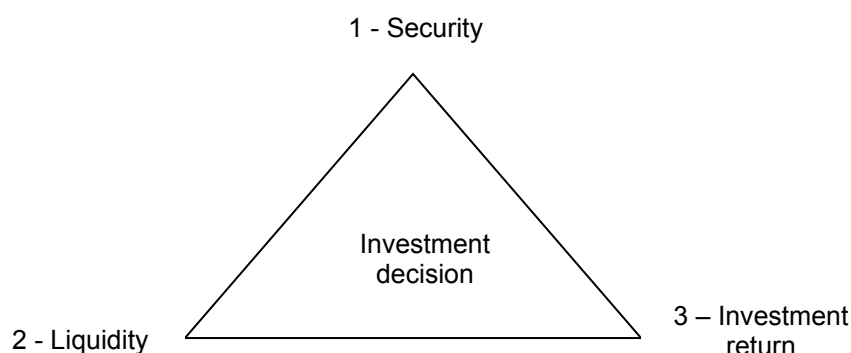
### **4. National Context**

- 4.1 In the UK quarter one was confirmed as having experienced a sharp slowing in the rate of growth to 0.2% quarter on quarter, from 0.7% the previous quarter. Households are feeling the effect of rising inflation on spending capacity and consumer spending growth slowed to 0.4% in quarter one.
- 4.2 Headline CPI increased to a peak of 2.9% in May, the highest since 2013, before reducing to 2.6% in June. The increase in recent months is down to the import intensive areas of the basket of goods used to measure price changes. The rate of employment growth remained unchanged at 1.2% as was the employment rate of 4.6%.

- 4.3 The Bank of England kept the bank base rate at the new historic low of 0.25% throughout the quarter and left their Quantitative Easing (QE) programme at £435bn.
- 4.4 The economic situation together with the financial market conditions prevailing throughout the quarter continued to provide challenges for treasury management activities. Due to the low interest rate environment, only monies needed for day to day cash flow activities were kept in instant access accounts.
- 4.5 Low interest rates prevailed throughout the quarter from April to June 2017 and this led to low investment income earnings from most investments.

## 5. Investments

- 5.1 A prime objective of our investment activities is the security of the principal sums invested. To ensure this security before an in-house deposit is made an organisation is tested against a matrix of credit criteria and then other relevant information is considered. During the period from April to June 2017 investment deposits were limited to those who met the criteria in the Annual Investment Strategy when the deposit was placed.
- 5.2 Other investment objectives are to maintain liquidity (i.e. adequate cash resources to allow the council to operate) and to optimise the investment income generated by surplus cash in a way that is consistent with a prudent level of risk. Investment decisions are made with reference to these objectives, with security and liquidity being placed ahead of the investment return. This is shown in the diagram below:



Security:

- 5.3 To maintain the security of sums invested, we seek to lower counterparty risk by investing in financial institutions with good credit ratings, across a range of sectors and countries. The risk of loss of principal of all monies is minimised through the Annual Investment Strategy.
- 5.4 Pie chart 1 of Appendix 1 shows that at the end of quarter one; 63% of our in-house investments were placed with financial institutions with a long term credit rating of AAA and 37% with a long term rating of A-.

- 5.5 As shown in pie chart 2 of Appendix 1 these monies were with various counterparties, 37% being placed directly with banks and 63% placed with a range of counterparties via money market funds.
- 5.6 Pie chart 3 of Appendix 1 shows the range of countries where the parent company of the financial institution with which we have monies invested is registered. For money market funds there are various counterparties spread across many countries.

Liquidity:

- 5.7 Our in-house monies were available on an instant access basis at the end of quarter one, except for £10m which had been placed in a 95 day notice account. The maturity profile of our investments is shown in pie chart 4 of Appendix 1.

Investment return:

- 5.8 During the quarter the Council used the enhanced cash fund manager Payden & Rygel to manage monies on our behalf. An average balance of £5.0m was invested in these funds during the quarter earning an average rate of 0.52%. More details are set out in Table 2 of Appendix 2.
- 5.9 The Council had an average of £48.6m of investments managed in-house over the period from April to June 2017, and these earned an average interest rate of 0.43%. Of the in-house managed funds:
- an average of £10m was held in notice accounts that earned an average interest rate of 0.44%;
  - an average of £8.0m was held in call accounts and earned an average return of 0.65% over the quarter;
  - an average of £30.6m was held in money market funds earning an average of 0.37% over the quarter. These work in the same way as a deposit account but the money in the overall fund is invested in a number of counterparties, therefore spreading the counterparty risk.
- 5.10 In accordance with the Treasury Management Strategy the performance during the quarter is compared to the average 7-day LIBID. Overall for both in-house and externally managed investments, performance on all types of investment was higher than the average 7 day LIBID (London Interbank Bid Rate). The bank base rate remained at 0.25% throughout the period from April to June 2017, and the 7 day LIBID rate fluctuated between 0.110% and 0.117%. Performance is shown in Graph 1 of Appendix 2.

## **6. Property Funds**

- 6.1 Throughout the quarter long term funds were invested in two property funds: Rockspring Property Investment Management Limited and Lothbury Investment Management Limited.



- 6.2 The monies are invested in units in the fund, the fund is then invested as a whole by the fund managers into properties. An income distribution is generated from the rental income streams from the properties in the fund. Income distributions are reinvested back into the fund. There are high entrance and exit fees and the price of the units can rise and fall, depending on the value of the properties in the fund, so these funds are invested over the long term with the aim of realising higher yields than other investments.
- 6.3 The interest equalisation reserve will be used to capture some of the income in the years when the property values are rising, and will then be available to offset any losses should property values fall. Members should be aware that this means that the investment returns in some quarters will look very good and in other quarters there may be losses reported, but these will not impact the revenue account as the interest equalisation reserve would be used to meet any temporary losses.
- 6.4 An average of £8.2m was managed by Rockspring Property Investment Management Limited. During the three month period, the value of the fund increased by £0.138m due to the increase in the unit value. There was also an income distribution relating to that period of £0.090m and this distribution will be confirmed and distributed in quarter two.
- 6.5 The Rockspring fund earned £0.228m during this three month period from a combination of the increase in the value of the units and the income distribution, giving a combined return of 11.18%. The fund started the quarter at £8.177m and increased in value with the fund at the end of the quarter at £8.405m.
- 6.6 An average of £7.7m was managed by Lothbury Property Investment Management Limited. During the three month period, the value of the fund increased by £0.113m due to the increase in the unit value. There was also an income distribution relating to that period of £0.062m and this distribution will be confirmed and distributed in quarter two.
- 6.7 The Lothbury fund earned £0.175m during this three month period from a combination of the increase in the value of the units and the income distribution, giving a combined return of 9.05%. The fund started the quarter at £7.682m and increased in value with the fund at the end of the quarter at £7.857m.

## **7. Short Dated Bond Funds**

- 7.1 During the quarter two short dated bond funds were used for the investment of medium term funds: Royal London Investment Grade Short Dated Credit Fund and the AXA Sterling Credit Short Duration Bond Fund.
- 7.2 The monies are invested in units in the fund, the fund is then invested as a whole by the fund managers into corporate bonds in the one to five year range. An income distribution will be generated from the coupon on the bond and income distributions will be reinvested back into the fund. The price of units can rise and fall, depending on the price of bonds in the fund so these funds are invested over the medium term with the aim of realising higher yields than short term investments.

- 7.3 The Council's interest equalisation reserve will be used to capture some of the income in the years when the corporate bond values are rising, and will then be available to offset any losses should bond values fall. Members should be aware that this means that the investment returns in some quarters will look very good and in other quarters there may be losses reported, but these will not impact the revenue account as the interest equalisation reserve would be used to meet any temporary losses.
- 7.4 An average of £7.6m was managed by AXA Investment Managers UK Limited. During the quarter the value of the fund increased by £0.013m due to an increase in the unit value, giving a return of 0.68%. The fund started the quarter at £7.537m and increased in value with the fund at the end of the period at £7.550m.
- 7.5 An average of £7.6m was managed by Royal London Asset Management. During the quarter the value of the fund decreased by £0.015m due to a decrease in the unit value and increased due to income distributions of £0.048m.
- 7.6 The Royal London fund earned £0.033m during the year from a combination of the decrease in the value of the units and the income distribution, giving a combined return of 1.73%. The fund started the quarter at £7.588m and increased in value with the fund at the end of the period at £7.621m.

## **8. Borrowing**

### **PWLB and short term borrowing**

- 8.1 The Capital Financing Requirement (CFR) is the Council's theoretical need to borrow but the Section 151 Officer can manage the Council's actual borrowing position by either:
- 1 - borrowing to the CFR;
  - 2 – choosing to use temporary cash flow funds instead of borrowing (internal borrowing) or;
  - 3 - borrowing for future increases in the CFR (borrowing in advance of need).
- 8.2 The Council began 2017/18 in the second of the above scenarios, with actual borrowing below CFR.
- 8.3 This, together with the Council's cash flows, the prevailing Public Works Loans Board (PWLB) interest rates and the future requirements of the capital programme, were taken into account when deciding the amount and timing of any loans. No new PWLB loans were taken out and no loans matured during the quarter. No debt restructuring was carried out during the quarter.
- 8.4 The level of PWLB borrowing (excluding debt relating to services transferred from Essex County Council on 1st April 1998) remained at £227.8m during quarter one. The average rate of borrowing at the end of the quarter was 4.62%.

A profile of the repayment dates is shown in Graph 2 of Appendix 2. All PWLB debt held is repayable on maturity.

8.5 The table below summarises the PWLB activities during the quarter:

Quarter	Borrowing at beginning of quarter (£m)	New Borrowing (£m)	Re-financing (£m)	Borrowing repaid (£m)	Borrowing at end of quarter (£m)
April to June 2017	227.8	0	0	(0)	227.8
<i>Of which:</i>					
General Fund	150.8	0	0	(0)	150.8
HRA	77.0	0	0	(0)	77.0

8.6 The level of PWLB borrowing at £227.8m is in line with the financing requirements of the capital programme and the revenue costs of this borrowing are fully accounted for in the revenue budget. The current level of borrowing is also in line with the Council's prudential indicators and is Prudent, Affordable and Sustainable.

8.7 These figures exclude debt held by Essex County Council of £12.5m relating to assets transferred on 1st April 1998, which this Council is responsible for servicing. The debt is recognised as a deferred liability on our balance sheet.

8.8 Interest rates from the PWLB fluctuated throughout the quarter in response to economic events: 10 year PWLB rates between 1.84% and 2.13%; 25 year PWLB rates between 2.53% and 2.75% and 50 year PWLB rates between 2.27% and 2.48%. These rates are after the PWLB 'certainty rate' discount of 0.20%.

8.9 Two short term loans were taken out for cash flow purposes during the quarter and one short term loan for cash flow purposes was repaid during the quarter. See Table 3 of Appendix 2.

### **Funding for Invest to Save Schemes**

8.10 Capital projects were completed on draught proofing and insulation in the Civic Centre, and lighting replacements at University Square Car Park and Westcliff Library which will generate on-going energy savings. These are invest-to-save projects and the predicted revenue streams cover as a minimum the financing costs of the project.

8.11 To finance this projects in total the Council has taken out interest free loans of £0.22m with Salix Finance Ltd which is an independent, not for profit company, funded by the Department for Energy and Climate Change that delivers interest-free capital to the public sector to improve their energy efficiency and reduce their carbon emissions. The loans are for a period of four and five years with equal instalments to be repaid every six months. There are no revenue budget implications of this funding as there are no interest payments to be made and the revenue savings generated are expected to exceed the amount needed for the repayments. £0.018m of these loans were repaid during the period from April to June 2017.

8.12 At the meeting of Cabinet on 23rd June 2015 the LED Street Lighting and Illuminated Street Furniture Replacement Project was approved which was to be partly funded by 25 year reducing balance 'invest to save' finance from the Green Investment Bank (GIB). The balance outstanding at the end of quarter one was £8.60m. There were no repayments during the period from April to June 2017.

8.13 Funding of these invest to save schemes is shown in table 3 of Appendix 2.

## **9. Compliance with Treasury Management Strategy**

9.1 The Council's investment policy is governed by the CIPFA Code of Practice for Treasury Management in the Public Sector (revised in November 2009), which has been implemented in the Annual Investment Strategy approved by the Council on 23 February 2017. The investment activity during the quarter conformed to the approved strategy and the cash flow was successfully managed to maintain liquidity. See Table 4 of Appendix 2.

## **10 Other Options**

10.1 There are many options available for the operation of the Treasury Management function, with varying degrees of risk associated with them. The Treasury Management Policy aims to effectively control risk to within a prudent level, whilst providing optimum performance consistent with that level of risk.

## **11. Reasons for Recommendations**

11.1 The CIPFA Code of Practice on Treasury Management recommends that Local Authorities should submit reports regularly. The Treasury Management Policy Statement for 2017/18 set out that reports would be submitted to Cabinet quarterly on the activities of the treasury management operation.

## **12. Corporate Implications**

12.1 Contribution to Council's Vision & Critical Priorities

Treasury Management practices in accordance with statutory requirements, together with compliance with the prudential indicators acknowledge how effective treasury management provides support towards the achievement of the Council's Vision and Critical Priorities.

12.2 Financial Implications

The financial implications of Treasury Management are dealt with throughout this report.

12.3 Legal Implications

The Council has adopted the 'CIPFA Code of Practice for Treasury Management in the Public Sector' and operates its treasury management service in compliance with this Code.

#### 12.4 People Implications

None.

#### 12.5 Property Implications

None.

#### 12.6 Consultation

The key Treasury Management decisions are taken in consultation with our Treasury Management advisers.

#### 12.7 Equalities Impact Assessment

None.

#### 12.8 Risk Assessment

The Treasury Management Policy acknowledges that the successful identification, monitoring and management of risk are fundamental to the effectiveness of its activities.

#### 12.9 Value for Money

Treasury Management activities include the pursuit of optimum performance consistent with effective control of the risks associated with those activities.

#### 12.10 Community Safety Implications

None.

#### 12.11 Environmental Impact

None.

### **13. Background Papers**

None.

### **14. Appendices**

Appendix 1 – Treasury Management Position as at the end of Quarter One - 2017/18

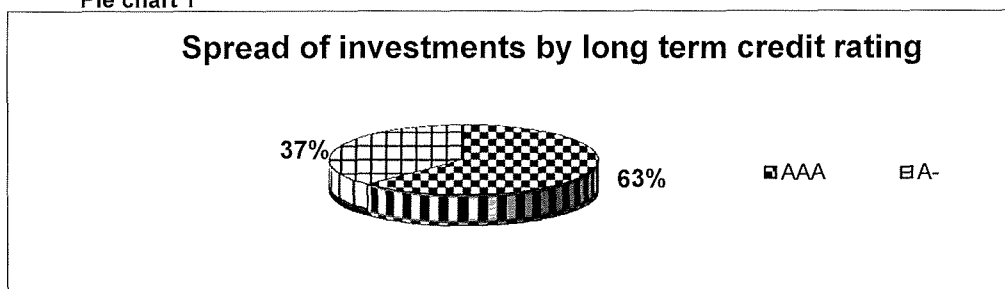
Appendix 2 – Treasury Management Performance for Quarter One - 2017/18

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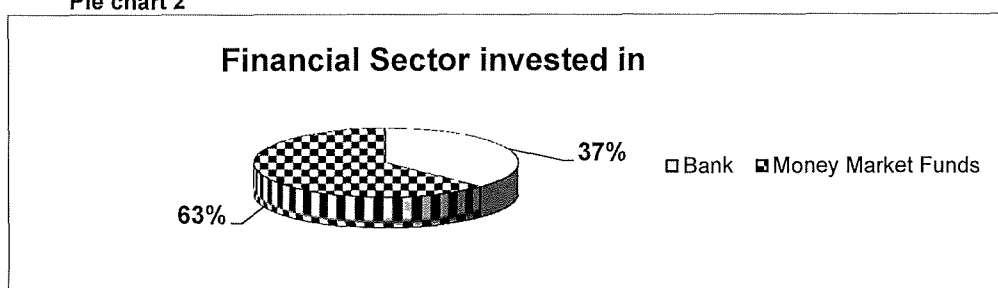
TREASURY MANAGEMENT PERFORMANCE AS AT 30th June 2017

INVESTMENTS - SECURITY AND LIQUIDITY

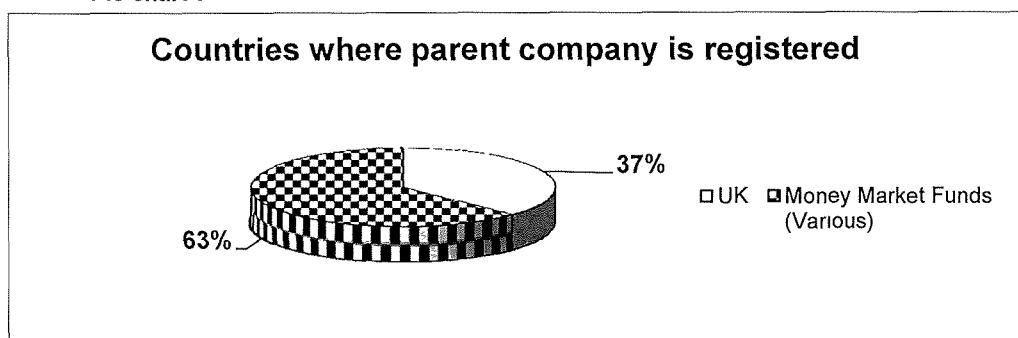
Pie chart 1



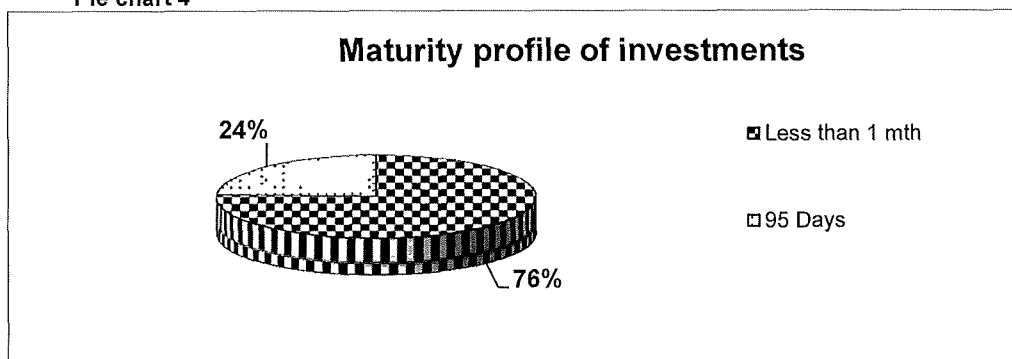
Pie chart 2



Pie chart 3



Pie chart 4



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Graph 1 - Investment Return

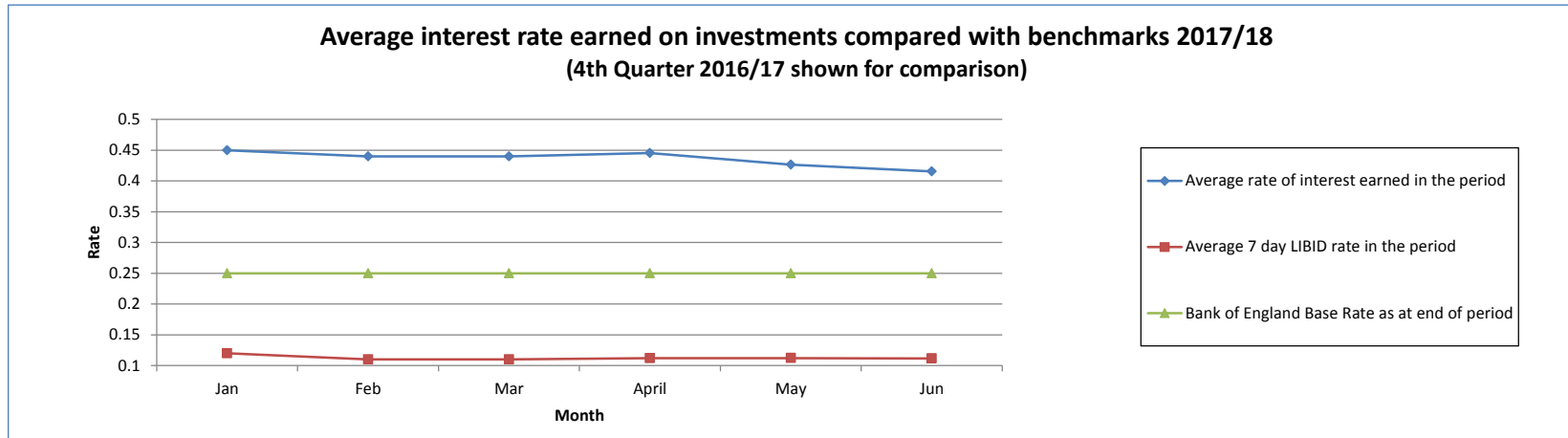


Table 1 - Property Funds

Financial Institution	Quarter	Period of investment	Value of fund at beginning of Qtr 1 £	Number of units at start of Qtr 1 Units	Number of units distributed during Qtr 1 Units	Purchased of new units during Qtr 1 Units	Number of units at end of Qtr 1 Units	Gross Increase / (Decrease) in fund value £	Income Distribution Qtr 1 £	Value of fund at end Qtr 1 £	Combined interest Rate %
Rockspring Hanover Real Estate Investment Mgt Ltd	1	5 Years +	8,176,610.46	594	7	0	601	138,285.05	89,592.76	8,404,488.27	11.18%
Lothbury Investment Management - Property Fund	1	5 Years +	7,682,461.95	4,139.3221	31.1337	0.0000	4,170.4558	112,478.38	62,417.83	7,857,358.16	9.05%
<b>Total</b>										<b>16,261,846.43</b>	

Table 2 - Short Dated Bond Funds/Enhanced Cash Fund

Financial Institution	Quarter	Value of fund at the start of Qtr 1 £	Number of shares Qtr 1 Units	Number of units distributed during Qtr 1 Units	Number of units at the end of Qtr 1 Units	Increase / (Decrease) in fund value £	Income Distribution during the Qtr 1 £	Value of fund at end of Qtr 1 £	Combined Interest Rate %
AXA	1	7,537,287.01	6,442,125.6460	N/a	6,442,125.6460	12,884.26	N/a	7,550,171.27	0.68%
Royal London	1	7,588,155.34	7,468,656.8300	47,027.5900	7,515,684.42	(15,125.42)	47,874.09	7,620,904.01	1.73%
Payden & Rygel	1	5,021,789.71	461,646.4158	N/a	461,646.4158	6,463.05	N/a	5,028,252.76	0.52%
<b>Total</b>								<b>20,199,328.04</b>	

**Table 3 - BORROWING**

SHORT TERM BORROWING		Rate	Amount (£)	From	To
In place during this Quarter					
Taken Out This Quarter	Somerset County Council	0.60%	£ 3,500,000.00	03/04/2017	29/03/2018
	Derbyshire County Council	0.80%	£ 3,500,000.00	03/04/2017	29/03/2019
Repaid This Quarter	Borough of Poole	0.35%	£ 5,000,000.00	15/12/2016	13/04/2017

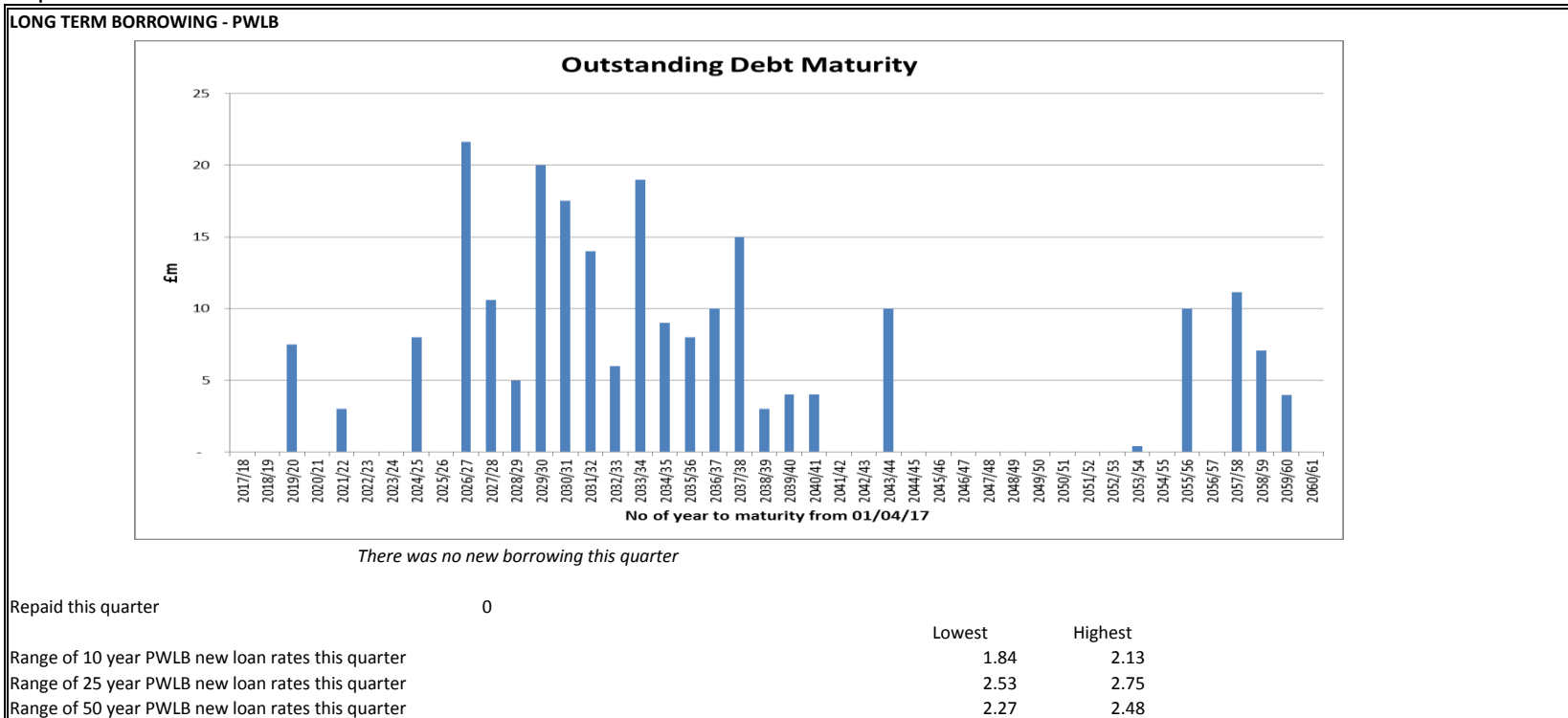
**Invest to Save Funding**

Financial Institution	Date	Period of loan	Final Repayment date	Amount borrowed £	Amount Repaid to Date £	Interest for Quarter 1 %
Salix Finance Ltd Energy Efficiency Programme	26/03/2015	4 Years	01/04/2019	141,059	(70,529.48)	0%
	23/03/2017	5 Years	01/04/2022	82,017	0.00	0%

Green Investment Bank:

- 25 year reducing balance finance
- balance of £8.6m outstanding at the end of quarter one
- there were no repayments during this quarter

**Graph 2**



**COMPLIANCE WITH TREASURY MANAGEMENT STRATEGY**

**Table 4**

All transactions properly authorised	✓
All transactions in accordance with approved policy	✓
Recommended changes :	
All transactions with approved counterparties	✓
Cash Flow successfully managed to maintain liquidity	✓
Any recommended changes to procedures	None required

# Southend-on-Sea Borough Council

Agenda

Item

Report of Chief Executive

To

Cabinet

on

19<sup>th</sup> September 2017

Report prepared by: Bridgette Cowley  
Revenues Group Manager

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## Debt Management- Position to 31<sup>st</sup> July 2017

Policy and Resources Scrutiny Committee  
Executive Councillor: Councillor Moring

*A Part 1 Public Agenda Item*

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### 1. Purpose of Report

1.1 The purpose of this report is to apprise Cabinet of the following:

- The current position of outstanding debt to the Council, as at 31<sup>st</sup> July 2017;
- Debts that have been written off, or are recommended for write off, in the current financial year as at 31<sup>st</sup> July;
- Obtain approval for the write off of irrecoverable debts that are over £25,000.

### 2. Recommendation

That Cabinet:-

2.1 Notes the current outstanding debt position as at 31<sup>st</sup> July 2017 and the position of debts written off to 31<sup>st</sup> July 2017 as set out in Appendices A & B

2.2 Approves the write offs as detailed in Appendix B.

### 3. Background

3.1 It was agreed by Cabinet on 19<sup>th</sup> March 2013, following a report of debts over £25k to be written off, that the Director of Finance and Resources would submit a report on a regular basis to Cabinet on all aspects of the Council's outstanding debt, along with the required write off position. This is the first report for the financial year 2017/18.

3.2 Southend-on-Sea is made up of a number of service areas responsible for the collection and administration of outstanding debt. The main areas are Accounts Receivable and Revenues which are linked to the billing and collection of the vast majority of debts that fall due to be paid to the Council for chargeable services, such as social care (see 4.5 ) and statutory levies such as Council tax and Non Domestic Rates (Business Rates).

However, there are other areas of debt that are included in this report, namely recovery of Housing Benefit Overpayments, Parking and Enforcement penalties and library fines. In addition, there are also debts for the Housing Revenue Account for rent arrears and service charges.

3.3 The process and legislative framework for the collection and write off of debt were detailed in the report to Cabinet on 17<sup>th</sup> September 2013. However, it is worth noting that the Council has a good success rate in collection of debt, and the collection targets are agreed annually as part of the Councils service planning process.

3.4 Debts are only considered for write off where all other courses of recovery available have been undertaken or explored and the debt is considered irrecoverable.

#### 4. Councils Debt Types

##### 4.1 Council Tax

£88.4m of Council Tax is due to be collected in 2017/18, with a collection target of 97.3%.

In 2016/17 97.5% of the outstanding Council Tax due was collected, and collection continues for the outstanding arrears for that year and for previous years. The chart below shows the actual in year collection rate over the past 4 years, and the collection rate of each year's charge to date, including debts that have been written off.

	Council Tax Performance	
	As at 31st March of relevant year	As at 31 <sup>st</sup> July 2017
1st April 2013 - 31st March 2014	97.1%	99.5%
1st April 2014 - 31st March 2015	96.8%	99.3%
1st April 2015 - 31st March 2016	97.2%	99.0%
1st April 2016 - 31st March 2017	97.5%	98.2%

#### 4.2 Non Domestic Rates (Business Rates)

£46.7m of Non Domestic rates is due to be collected in 2017/18, with a collection target of 97.9%.

The Council achieved an overall collection of 98.0% in 2016/17 which was 0.2% above target and collection is continuing for outstanding arrears for previous financial years.

The chart below shows the actual in year collection rate over the past 4 years, and the collection rate of each year's charge to date, including debts that have been already written off.

	<b>Non-Domestic Rates Performance</b>	
	<b>As at 31st March of relevant year</b>	<b>As at 31st July 2017</b>
<b>1st April 2013 - 31st March 2014</b>	<b>97.5%</b>	<b>99.9%</b>
<b>1st April 2014 - 31st March 2015</b>	<b>97.6%</b>	<b>99.7%</b>
<b>1st April 2015 - 31st March 2016</b>	<b>97.8%</b>	<b>99.6%</b>
<b>1st April 2016 - 31st March 2017</b>	<b>98.0%</b>	<b>99.5%</b>

#### 4.3 Housing Benefit Overpayment

This is any entitlement to a rent allowance or rent rebate that a person has received but is not entitled to. Most commonly this accumulates when there is a change to a person's circumstance and they fail to notify us in good time. The overpayment will be invoiced unless they are in receipt of Housing Benefit in which case their benefit entitlement is reduced to enable recovery of the overpayment. The vast majority of Housing Benefit overpayment is due to claimant error.

#### 4.4 Libraries

Library debt is made up of overdue fines and replacing lost or non-returned books.

#### 4.5 Department for People - Adult Services (formerly Social care)

Adult Services make charges for the following services;

- Contributions to residential accommodation
- Charges for non-residential services i.e. Home Care, Community Support, Day Services and transport to services
- Charges to other local authorities

- Charges to Health Authority

Adult Social Care Debt as at 31<sup>st</sup> July 2017 was £5,281,277 in comparison to £5,386,836 on 31<sup>st</sup> July 2016.

It should be noted that of the total amount outstanding;

- £1,792,879 is debt secured against property
- £1,280,583 is being collected by Direct Debit
- £643,267 is under 30 days old

#### 4.6 Parking

The recovery of unpaid Penalty Charge Notices is undertaken by semi-judicial process under the current Traffic Management Act 2004.

From 1<sup>st</sup> April 2017 to 31<sup>st</sup> July 2017 a total of 14,865 Penalty Charge Notices (PCNs) have been issued identifying a projected income of £469,417. It should be noted that PCNs are issued at a higher rate and lower rate (£70.00 and £50.00 respectively) depending on the seriousness of the parking contravention. PCNs may be paid at a discounted rate of 50% of the charge if paid within 14 days of the date of issue.

This value is continuously being amended as payments are received and it should be recognised that payments made at the 50% discount amount will reduce the projected income level. Generally, 75% of paid PCN's are paid at the discounted payment.

The value of cancelled notices is £36,893 and cases written off where no keeper has been identified totals £18,503.

#### 4.7 Miscellaneous Income

This will include a range of services that the Council will charge for including such areas as rental income on commercial properties, recharges to other bodies for services we have provided, and recovering overpaid salaries from staff that have left.

It is important to note that collection can vary month by month depending on the value of invoices raised as a reasonable period needs to be allowed for payment to be made.

#### 4.8 Housing

Under the management of South Essex Homes there are the arrears of outstanding debt of Rent and Service Charges. The cost of any write-offs for this category of debt is specifically charged to the Housing Revenue Account and not to Council Tax Payers.



## 5. Write-Off Levels

5.1 Write off approval levels currently in place are shown in the tables below, which are in accordance with the Financial Procedure rules set out in the Constitution and the corporate debt recovery policy.

### Debt Type: Council Tax/ Accounts Receivable/Social Care/ Housing and Council Tax Benefit

Designation	Amount
Assistant Manager/Manager	under £5,000
Director of Service	Between £5,000 and £25,000
Cabinet	£25,000 and above

### Debt Type: NNDR (Non Domestic Rates)

Designation	Amount
Assistant Manager	under £5,000
Manager	Between £5,000 and £10,000
Director of Service	Between £10,000 and £25,000
Cabinet	£25,000 and above

### Debt Type: Parking

Designation	Amount
Notice Processing Officer & Section Leader.	under £5,000
Section Leader	Between £5,000 and £10,000
Group Manager	Between £10,000 and £25,000
Cabinet	£25,000 and above

### Debt Type: Housing Rents and Service Charges

South Essex Homes, as managing agent, submit proposed write-offs to the Council, following which the following approval levels are exercise

Designation	Amount
Head of Service	Under £25,000
Cabinet	£25,000 and above

5.2 Write offs for Cabinet approval are shown in Appendix B.

## **6. Council Debt Position (as at 31/07/17)**

Appendices A and B show the current debt position within each service area, and the amount that has been written off so far in the current year.

For Council tax and Non Domestic rates there is a net collectable debt at the beginning of the year. Although this can change depending on changes to liability or property being removed or introduced to the lists, it is fairly consistent.

However other service areas may see greater fluctuations as new debts are created during the financial year.

## **7. Other Options**

This is a report notifying members of the current position of the Council's debt and related write offs, and therefore there are no other options.

## **8. Reasons for Recommendations**

All reasonable steps to recover the debt have been taken, and therefore where write off is recommended it is the only course of action available.

If the Council wishes to pursue debts for bankruptcy proceeding, it will follow the agreed and published recovery policy that covers this.

## **9. Corporate Implications**

### **9.1 Contribution to Council's Vision & Corporate Priorities**

Efficient write off of bad and irrecoverable debts, where appropriate, is good financial practice and reduces the bad debt provision and financial impact in the Authority's accounts.

### **9.2 Financial Implications**

Debts that are written off will have been provided for within the Councils bad debt provision and as such there should be no specific financial implications. However it is possible that unforeseen and unplanned additional write offs occur, which lead to the value of debts written off in any year exceeding the bad debt provision.

Where this is likely to happen, this report will act as an early warning system and will enable additional control measures to be agreed and taken to either bring the situation back under control, or to make appropriate adjustments to the bad debt provision.

Relevant service areas have to bear the cost of debts that are written off within their budget.

### 9.3 Legal Implications

If there are debts to be written off that exceed the level at which officers have delegated powers to deal with the matter, authorisation is required from the Cabinet.

### 9.4 People Implications

The people implications have been considered and there are none relevant to this report

### 9.5 Property Implications

The property implications have been considered and there are none relevant to this report

### 9.6 Consultation

Consultation is not required for write off of debt

### 9.7 Equalities and Diversity Implications

Each write-off is considered on an individual basis, there is no equalities and diversity implication to consider

### 9.8 Risk Assessment

There is a financial implication to the bad debt provision if write offs are not dealt with within the current financial year

### 9.9 Value for Money

It is a matter of good financial practice and good debt management to report value of debt and write off regularly.

### 9.10 Community Safety Implications

There are no Community Safety Implications

### 9.11 Environmental Impact

There is no environmental impact

## 10. Background Papers

Full details of recovery action against each recommended write-off are held within the services computer systems.

## **11. Appendices**

Appendix A Summary of outstanding debt  
Appendix B Summary of Write offs

**Summary of Outstanding Debt****Outstanding Debt pre 1<sup>st</sup> April 2017 (arrears)**

<b>Debt pre 1/4/17</b>	<b>Council Tax (a)</b>	<b>Business Rates (a)</b>	<b>Housing Benefit Overpayments (b)</b>	<b>Social Care</b>	<b>Miscellaneous Income</b>	<b>HRA (Care Line/Service Charges)</b>	<b>Parking (c)</b>	<b>Libraries (d)</b>	<b>HRA Current Tenants (e)</b>	<b>HRA Former Tenants (e)</b>
	<b>£'000</b>	<b>£'000</b>	<b>£'000</b>	<b>£'000</b>	<b>£'000</b>	<b>£'000</b>	<b>£'000</b>	<b>£'000</b>	<b>£'000</b>	<b>£'000</b>
Net Collectable Debt	5,879	1,746	6,664	4,094	5,272	311	11,459	n/a	-	337
Amount Paid @ 31.07.2017	1,137	357	1,153	1,058	3,953	174	9,635	438	-	77
Number of Accounts	14,692	352	2387	1,090	1,112	180	n/a	n/a	-	198
<b>Total Outstanding</b>	<b>4,649</b>	<b>1,348</b>	<b>3,031</b>	<b>3,036</b>	<b>1,319</b>	<b>137</b>	<b>1,824</b>	<b>n/a</b>	<b>-</b>	<b>261</b>

**Current Year Debt (Debt raised in respect of 2017/18)**

<b>Debt post 1/4/17</b>	<b>Council Tax (a)</b>	<b>Business Rates (a)</b>	<b>Housing Benefit Overpayments (b)</b>	<b>Social Care</b>	<b>Miscellaneous Income</b>	<b>HRA (Care Line/Service Charges)</b>	<b>Parking (c)</b>	<b>Libraries (d)</b>	<b>HRA Current Tenants (e)</b>	<b>HRA Former Tenants (e)</b>
	<b>£'000</b>	<b>£'000</b>	<b>£'000</b>	<b>£'000</b>	<b>£'000</b>	<b>£'000</b>	<b>£'000</b>	<b>£'000</b>	<b>£'000</b>	<b>£'000</b>
Net Collectable Debt at 31.07.2017	83,273	47,578	1,248	4,779	9,795	989	618	n/a	11,154	76
Amount Paid @31.07.2017	31,605	18,353	1,153	2,529	6,985	463	332	10	11,139	8
Number of Accounts	74,497	2,512	1,842	1,513	871	3,187	n/a	n/a	1,684	104
<b>Total Outstanding</b>	<b>56,918</b>	<b>28,387</b>	<b>2,632</b>	<b>2,250</b>	<b>2,810</b>	<b>526</b>	<b>286</b>	<b>n/a</b>	<b>442</b>	<b>68</b>

## **NOTES**

- (a) Council Tax and Business Rates includes adjustments for write offs, credits and outstanding court costs.
- (b) HB Overpayment is not attributable to a financial year in the same way that Council Tax or NDR are i.e. a yearly debit is not raised. It is also not feasible to state when a payment is made which age of debt it has been paid against. For these reasons the outstanding amounts in the report reflect the actual outstanding debt at the date requested, it does not reflect the outstanding debt against current year and previous year debts.
- (c) Parking total outstanding is net of PCNs cancelled and written off.
- (d) The figure of £438k relates to total payments received since January 2005 until 31/03/2017.
- (e) HRA tenancy debts (residential rent accounts) are rolling amounts, with no breaks in years or rollovers. Any cash received is applied to the oldest rent week outstanding. The figures shown are total arrears outstanding, and therefore include arrears still outstanding from prior years.

Summary of Write Off's

Debts written off in 2017/18

Period 1 April 2017 – 31 March 2018 relating to any year

Write Offs	Council Tax £	Business Rates £	Housing Benefit Overpayment £	Social Care £	Miscellaneous Income £	HRA (Care Line/Service Charges) £	Parking £	Libraries £	HRA Tenants £
Under £5k	118,165.68	34,650.98	89,272	14,041	3,664	0	18,503	4478	63,518
£5k-£25k	0	20,372.71	34,949	5,674	0	0	0	0	0
Over £25k	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>118,165.68</b>	<b>55,023.69</b>	<b>124,221</b>	<b>19,715</b>	<b>3,664</b>	<b>0</b>	<b>18,503</b>	<b>4,478</b>	<b>63,518</b>

Write off greater than £25,000 for approval

Amount of Write off £	Reason for Write Off	Service Area
£35,738.91	<b>S X (Southend) Limited (In Liquidation).</b> The company were in occupation of Basement, Maitland House effective from 10 <sup>th</sup> September 2014. Full recovery action was taken each year resulting in Liability Orders being granted by Magistrates Court. Each financial year has been issued to a Bailiff company for collection and payments were received. S X (Southend) Limited was liquidated on 2 <sup>nd</sup> January 2017 leaving a debt of £35,738.91 in respect of the financial year 2016/2017.	Non-Domestic Rates
£106,286.90	<b>Vitbaas Property &amp; Leasing Ltd</b> Company held lease for this property 159/163 High Street, Southend-on-Sea for period 25 <sup>th</sup> November 2015 to 3 <sup>rd</sup> December 2016. Full recovery action was taken each year resulting in Liability Orders being granted by Magistrates Court. Debts were issued to Bailiff Companies to enforce the Liability Order's which resulted in some payments being made to the account. Company was dissolved on 14 <sup>th</sup> March 2017.	Non-Domestic Rates
£29,325.52	<b>Housing Benefit Overpayment.</b> After an investigation held between the DWP and SBC It was deemed that the applicant failed to notify the Pension Service when an application was made that the he had a property abroad. (This application would also be used for an application to Housing Benefit)	Housing Benefits Overpayment

	<p>At the end of the investigation the DWP disallowed Pension Credit and Housing benefit was re-assessed creating a Housing Benefit Overpayment of £29,325.52.</p> <p>Whilst trying to recover the overpayment the applicant is now residing in a Care Home and has been diagnosed with Parkinson's Disease. It has been advised the applicant would be unable to agree or disagree to any of the investigation.</p> <p>The applicant has no saving or estate other than the property in Spain and the Council is unable to place a Charging Order on this property as it is abroad.</p> <p>No further prospect of recovery on this debt.</p>	
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# Southend-on-Sea Borough Council

Agenda  
Item No.

## Report of Chief Executive

to  
**Cabinet**

on  
**19 September 2017**

Report prepared by: Alan Richards  
Group Manager Corporate Property and Asset Management

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### Appropriation of Land at Burr Hill Chase

**Policy and Resources Scrutiny Committee**  
**Executive Councillor: Councillor Andrew Moring**  
***A Part 1 Public Agenda Item***

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#### **1 Purpose of Report**

To agree the appropriation of the land of Priory School on Burr Hill Chase from education use for planning purposes to enable the wider redevelopment of the land following relocation of the School.

#### **2 Recommendation**

- 2.1 That under S122(1) of the Local Government Act 1972 the land of Priory School on Burr Hill Chase is appropriated from education use for planning purposes immediately following the vacation of the site to enable its redevelopment following relocation of the school in accordance with the consent of the Secretary of State for Education.

#### **3 Background**

- 3.1 Cabinet considered a Part 2 report on 10 November 2015 titled "The Acquisition of Land and Buildings for School Improvement and Secondary Places" and agreed, amongst other things, to apply to the Secretary of State for Education for the disposal (by appropriation) of the education land at Site C [Land at Burr Hill Chase] (Minute 421 refers).
- 3.2 The consent of the Secretary of State has now been secured for this appropriation and it can now therefore be actioned.
- 3.3 The land is let under a short term licence to Parallel Learning Trust pending relocation to Wentworth Road on completion of refurbishment works underway there. The appropriation should take effect immediately on termination of the licence when the school has relocated.

## **4 Statutory ability to appropriate**

- 4.1 Section 122(1) of the Local Government Act 1972 provides that a council "...may appropriate for any purpose for which the council are authorised ... to acquire land by agreement any land which belongs to the council and is no longer required for the purpose for which it is held immediately before the appropriation...".
- 4.2 It is pertinent to appropriate the subject land now as the arrangements for the academisation, consolidation and relocation of the schools operating from the site have been finalised subject to the completion of works at Wentworth Road. The demolition of the buildings at Burr Hill chase will follow the relocation to prepare the land for future development in connection with the adjacent Priory House, The Viking Centre and Delaware House in Shoebury.
- 4.3 The ownership of the asset will not change; the Council itself owns all the assets regardless of the power under which they are held. It is only the designation of the land for a particular purpose which will change.

## **5 Accounting Arrangements**

- 5.1 As the land is currently, and will continue to be held in the General Fund, the value of the land is not relevant to this appropriation.
- 5.2 The changes in circumstance and the appropriation will be taken in to consideration on the revaluation of the asset. The Schools portfolio is scheduled for revaluation in 2017-18 and this will therefore be picked up in this year's routine asset valuation work.

## **6 Other Options**

- 6.1 As the Cabinet has agreed the future use of the land subject to the consent of the Secretary of State for education which has now been received, other options are not relevant in this case.

## **7 Reason for the Recommendation**

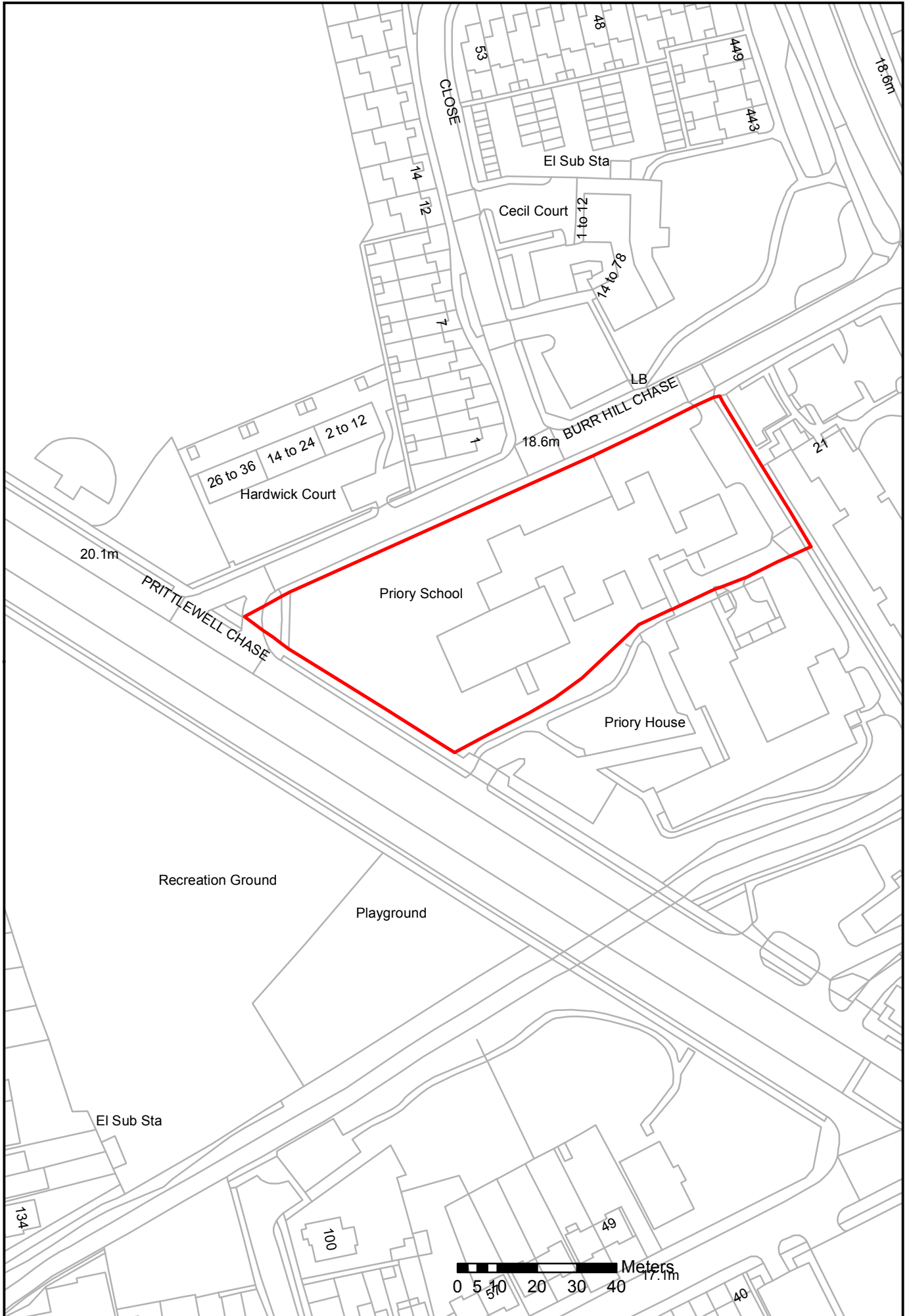
- 7.1 The appropriation of the land is required to ensure that the use is appropriately recorded and the land is enabled for future development.

## **8 Corporate Implications**

- 8.1 **Contribution to Council's Vision & Critical Priorities**  
The recommendations in this report contribute directly to the Council's corporate priority to enable well-planned quality housing and developments that meet the needs and expectations of all of Southend's residents.
- 8.2 **Financial Implications**  
As set out above, there are not financial implications other than that the asset will be revalued on a different basis for accounting purposes at the next revaluation.

- 8.3 Legal Implications  
As set out in the report
- 8.4 People Implications  
There are no people implications arising from this report
- 8.5 Property Implications  
This report will merely result in the appropriation of the asset out of education use to provide the Council with freedom in relation to its future development. There is no actual change in ownership.
- 8.6 Consultation  
There are no consultation implications arising from this report however the Secretary of State for Education has been consulted through the application process and consent has been given.
- 8.7 Equalities Impact Assessment  
There are no equalities implications arising from this report
- 8.8 Risk Assessment  
There are no risk implications arising from this report
- 8.9 Value for Money  
The proposals within this report are consistent with the Council's plans to continue to improve value for money within the services it offers.
- 8.10 Community Safety Implications  
There are no community safety implications arising from this report
- 8.11 Environmental Impact  
There are no environmental implications arising from this report
- 9 Background Papers**  
None
- 10 Appendices**
- Appendix 1** Site plan

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# Southend-on-Sea Borough Council

Report of the Deputy Chief Executive (People)  
to  
**Cabinet**

on  
**19<sup>th</sup> September 2017**

Report prepared by: Catherine Braun – Group Manager  
Access and Inclusion

**Agenda  
Item No.**

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**Provision of Secondary School Places in Southend September 2019**  
**People Scrutiny Committee**  
**Executive Councillor: Councillor James Courtenay**  
***A Part 1 (Public) Agenda Item***

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## **Purpose of Report**

- 1.1 To update members on the progress of the Secondary School Places Programme and the progress on identifying a site for a new Free School

## **2. Recommendations**

- 2.1 That current progress on the progression of current expansion projects at good and outstanding secondary schools for September 2018, namely Shoeburyness High School and St Thomas More High School be noted (previously agreed by cabinet in June 2017).
- 2.2 To agree the continuation of expansion discussions with remaining Good and Outstanding Schools, namely Belfairs Academy, The Eastwood Academy and St Bernard's High School to secure the remaining 60 places still required for September 2018.
- 2.3 To agree that work on securing the plot of land identified in the report to support an application to the Department of Education for a new secondary free school for September 2019 continue.

## **3. Background**

- 3.1 The local authority has a statutory duty to ensure that there are sufficient school places available in its borough for providing primary and secondary education. This can be achieved by provision of capital and/or land to both maintained and non-maintained schools. To date existing provision has been identified through expansions of existing primary schools through basic need funding.
- 3.2 Following on from the expansion of the primary schools following a large increase in birth rate and additional population moving into the borough these larger cohorts will enter secondary schools from September 2018 with an additional 5 forms of entry needed for that years admissions round.
- 3.3 An additional 9 permanent forms of entry, along with two/three temporary expansions, were added to the borough primary schools and a matching expansion is

required to meet this within the secondary schools. The year of greatest demand is forecast to be 2022.

- 3.4 In addition to these extra places Essex County Council (ECC) has also reported that large housing developments taking place in the Rochford and Rayleigh areas, along with their own population growth, will significantly reduce the number of places available for out of catchment applications, especially those traveling in from out of ECC Authority areas. Currently an annual average of 250 Southend resident pupils take up places within ECC schools.
- 3.5 Due to the currently accessed ECC places reducing significantly, the required expansion numbers as noted in 3.2 have increased to a secondary need of 12 permanent FE plus a further 2 in bulge years. (**Appendix 1**)
- 3.6 On 20<sup>th</sup> June 2017, Council agreed to progress expansion projects at Shoeburyness High School and St Thomas More to procurement stage and to continue expansion discussions with remaining Good and Outstanding Schools, namely Belfairs Academy, The Eastwood Academy and St Bernard's High School to secure the remaining 60 places still required for September 2018.
- 3.7 Council also agreed in June 2017 that a free school is required for September 2019 for the required additional 180 places, which requires the identification of council owned land to support any application to the Department of Education. A preferred site was identified and agreement gained to seek legal advice and enter negotiations to obtain the land.

#### **4. Expansion Programme**

##### **4.1 Open Projects Update**

- 4.1.1 Shoeburyness High School has agreed to expand permanently by one form of entry from September 2018 as well as take a one off bulge year also for September 2018. A project has been agreed, planning permission has been granted and the main contractors have been appointed.
- 4.1.2 St Thomas More have agreed to expand by one form of entry on a permanent basis from September 2018 and designs with indicative costs have been drawn up. A planning application will be submitted shortly.
- 4.1.3 St Bernard's have expressed a desire to expand from September 2018 by one form of entry. It is unlikely that agreement for 2018 will be achieved due to current admission criteria unlikely to meet a Southend need, however discussions continue with St Bernard's and options remain available for future years of expansion.
- 4.1.4 The Eastwood Academy has consulted on expansion, however to date has not provided the local authority with any confirmation of their commitment to expand, including information of the number of pupils they plan to expand by and when expansion is expected. A capital project is currently being costed for internal refurbishments and the local authority awaits confirmation.
- 4.1.5 Belfairs Academy has procured a feasibility study for potential expansion of up to 2 forms of entry. To date, the academy has yet to provide any confirmation of commitment to expand. The feasibility report and confirmation of expansion commitment is expected in mid-September 2017 (including number of forms of entry/pupils and which year expansion is expected).



## 4.2 Free School Land Acquisition

- 4.2.1 A preferred site (**Appendix 2**) has been identified which meets the minimum requirements regarding size, is not in close proximity to any existing non-selective mainstream secondary provision and is owned by Southend Borough Council. Cabinet previously identified all possible potential sites that were available prior to the selection of this site specifically as the preferred site.
- 4.2.2 Access to the site is to be agreed once curtilage of the plot is finalised but where possible the intrusion of additional new roadways will be kept to a minimum.
- 4.2.3 Legal advice is being sought on the Council's rights to terminate any tenancy agreements and the format of any negotiations with tenants where applicable, to better understand costs involved, and planning permission issues regarding change of use of the land.
- 4.2.4 Following approval by Cabinet, further detailed work on potential planning, ecological, archaeological and other aspects of due diligence can then proceed. From all options considered, the identified site meets the majority of the criteria for the new Free School, and, subject to the mitigation of the range of challenges that may emerge, will give the Council the best option to meet both its statutory obligations and provide residents with much needed secondary school places.

## 5 **Other options**

- 5.1 With regard to the requirement for additional places, our data indicates that there is evidenced need for the number of additional places as outlined in appendix one. Therefore the Council has no option other than to provide sufficient school places if it is to meet its statutory duties.
- 5.2 Cabinet have previously determined that for 2018, the places will be met through expansion on existing good school sites. For 2019 this is not an option, and Cabinet decided upon the free school. The only realistic options for the provision of a free school are either the DfE Capital route (preferred), or an appropriation route, which would require the Council not only to provide the land, but also the full capital costs, estimated to be within the region of £25 million. This option was discounted, as in effect the Council would be relinquishing significant capital to an academy trust.
- 5.3 The options discussed earlier by Cabinet, and contained within this paper indicate that the identified site met all of the requirements for a free school location. All other sites were discounted.

## 6. **Reasons for recommendations**

- 6.1 A local academy trust has confirmed their commitment to make an application to the Department of Education for wave 13 to open a free school in Southend Borough if a plot of land can be identified to support the application. It should be noted that the potential sponsor would bid for the free school and associated permissions rather than the Council, although they would have our full support.
- 6.2 A new secondary free school in the suggested area of the borough would meet the demand for secondary places across the borough from September 2019. For this to be achieved, agreement is required by members for the land at this site to be secured to strengthen the application and secure secondary school places for 2019.

- 6.3 Specifically, this site has been selected for recommendation due to a number of important factors
- 6.3.1 The Department for Education who make the ultimate decision, would be very unlikely to approve a location if it were prejudicial to the success of or in close proximity to an existing school.
- 6.3.2 The site selected is broadly located where the need is required, central Southend. There were no other sites available in the more densely populated area of the Borough of suitable size.
- 6.3.3 Transport links to and from the school are appropriate, and will not exacerbate existing school bottlenecks at particular times of the day. Access to the potential site for staff, cars and buses can be accommodated within the exiting planned road infrastructure.
- 6.3.4 The possible type of school that is being envisaged is a STEM school, (Science, Technology, Engineering and Mathematics). This type of curriculum will enhance the existing provision across the Borough, and allow greater parental choice. In addition, the close proximity of the site to the Airport and the Airport Business Park would allow innovative and important links with future employment and career opportunities.
- 6.3.5 Recognising the pressure relating to a need for opening in September 2019, the site will allow good access for construction following due process completion. therefore, any potential Academy Trust must be in a position to be able to move quickly, and have a proven track record of not only school improvement, but also in delivering a project of this scale to budget and to time.

## **7 Corporate Implications**

### **7.1 Contribution to Council's Vision & Corporate Priorities**

These arrangements will assist pupils within the Borough to access quality learning opportunities to achieve the best possible outcomes for all children:

'Ensure residents have access to high quality education to enable them to be lifelong learners and have fulfilling employment.'

### **7.2 Financial Implications**

The capital for this programme is being sought from the Department for Education Free School Capital Programme, wave 13, rather than from Council funds. However, if all or part of the costs are not funded from Wave 13 then other sources of finance will need to be explored including the potential for the use of Council funds.

In addition, there will be costs associated with site preparation and land assembly which should be funded from Wave 13. However, further work is being undertaken to establish if any of these costs are to be met by the Council. If so then the existing Education Capital Programme will need to fund these costs.

### **7.3 Legal Implications**

Legal advice is being sought on the processes of the land acquisition.

If sufficient places are not supplied the council will not meet its statutory duties in supplying sufficient school places. In the event that the authority breaches its statutory duty, the authority could face judicial review action challenging the authority's failure to provide sufficient schools for the provision of education. The

authority could also potentially face claims brought under the Human Rights Act 1998 (the right to education).

#### 7.4 People Implications

Risk of a % of children not having a secondary school place in September 2018

#### 7.5 Property Implications

DfE may commandeer local authority asset to build a free school (only those of sufficient size to meet a 6FE school would be at risk). Part of the open land proposed is the subject of tenancy leases. Legal advice is progressing on securing the necessary permissions.

#### 7.6 Consultation

Once the site is acquired a consultation will be required for change of use, for planning and also by the Academy Trust to open a new school.

#### 7.7 Equalities and Diversity Implications

By adding a new secondary school to Southend pupils and parent/carers will have a greater selection of schools to choose from. (See attached Equality Impact Assessment, **Appendix 3**)

#### 7.8 Risk Assessment

If the school places are not made available when needed the Council will fail in its duty to provide places for local residents that require one. In addition there remains a risk that any further delay in announcing wave 13 by the Department for Education may delay the implementation and opening of the new school ready for September 2019.

#### 7.9 Value for Money

No direct implications.

#### 7.10 Community Safety Implications

None envisaged. However, as part of the due diligence undertaken for both the planned existing school expansions, and the building of the new Free School, work will be undertaken to ensure that travel to school plans are updated to reflect the increase in numbers anticipated. This will both ensure that traffic increase is managed effectively, and that safe travel to school is taken into account in the school's plans..

#### 7.11 Environmental Impact

Unknown at present, but assessment would follow Cabinet permission

### 8. Background Papers

- 8.1 Report to Cabinet 20<sup>th</sup> June 2017 - Provision of Secondary School Places in Southend September 2019: Proposed Free School Site Part 1 & 2

### 9 Appendices

Appendix 1 - Forecast Numbers with Illustrated Forms of Entry Expansions  
Appendix 2 – Proposed Site  
Appendix 3 – Equality Impact Assessment

### Appendix 1 – Forecast Numbers including impact of Essex places and Illustrated Forms of Entry Expansions

	Year 7 Forecast	Essex Places pushed back to SBC	Year 7 Forecast + Pushback	Anticipated	Surplus/Deficit	Number of FE Required	Number of Places	Total Places	Surplus/Deficit
				PAN*	(B-A)		(D*28)	(B+E)	(F-A)
	A	Ai	Aii	B	C	D	E	F**	G
2017/18	2265	0	2265	2300	35	0	0	2300	35
2018/19	2361	60	2421	2300	-121	5	140	2440	19
2019/20	2525	75	2600	2320	-280	10	280	2600	0
2020/21	2540	90	2630	2320	-310	12	336	2656	26
2021/22	2583	105	2688	2320	-368	14	392	2712	24
2022/23	2585	105	2690	2320	-370	14	392	2712	22
2023/24	2547	105	2652	2320	-332	12	336	2656	4
2024/25	2476	105	2581	2320	-261	10	280	2600	19
2025/26	2508	105	2613	2320	-293	11	308	2628	15

\*PAN is combined PAN as known for 2017/18. From 2019/20 including additional places at Cecil Jones.

\*\*Column F indicates the anticipated increased combined PANs.

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Appendix 2 Proposed Site



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# **Southend on Sea Borough Council - Equality Analysis**

## **What is an Equality Analysis (EA)?**

- An EA provides an assessment of the impact of decisions relating to a policy, service function or restructure on particular customers, residents and staff.

## **Why do I need to do an EA?**

- It helps to improve the quality of decision making by enabling equality considerations to be taken into account.
- It shows that 'due regard' is being given to the Public Sector Equality duty in decision making – a requirement of the Equality Act 2010.
- It reduces the potential of decisions being challenged, leading to delayed implementation and risk of costly processes like Judicial Review.

## **When should I complete my EA?**

- Your EA should be started before or at the first stages of a review of a policy, service function or a restructure.
- It is not a one-off exercise, but a rolling document along with the process of change.

## **Who should complete an EA?**

- An EA should never be completed by one person
- It is advised that you do it as part of a team including a range of people from officers, managers, staff forum members or stakeholders.

## **What makes an effective EA?**

- Reliable and accurate data and evidence
- A diverse team to enable all angles of impact are discussed
- Awareness of multiple disadvantage

## **Where can I go for support?**

- More detailed information and guidance can be found here... on the intranet
- Tim MacGregor in Policy, Engagement and Communications can be contacted on ext. 4025 or at [timmacgregor@southend.gov.uk](mailto:timmacgregor@southend.gov.uk) for any issues.

## 1. Background Information

**1.1 Name of Process:** Expansion of Southend Secondary Schools

**1.2 Department:** The Department of People

**1.3 Service Area:** Access and Inclusion

**1.4 Date Equality Analysis undertaken:** 1<sup>st</sup> August 2017 on going

**1.5 Names and roles of staff carrying out the Equality Analysis:**

Name	Role	Service Area
Catherine Braun	Group Manager – Access and Inclusion	Access and Inclusion
June Edwards	School Development Manager	School Development
Chrissy Papas	Pupil Access Manager	Pupil Access

**1.6 What are the aims or purpose of the policy, service function or restructure that is subject to the EA?**

### **Expand Southend Secondary Schools to meet upcoming demand**

- Following a large expansion of Primary School places there is a need to expand the Secondary Schools to match this expansion as the larger pupil cohort's start to move from KS2 to KS3.
- The first larger cohort enters KS3 from September 2018.

**1.7 What are the main activities relating to the policy, service function or restructure?**

- Current non-selective Secondary Schools that are rated Good or Outstanding by Ofsted have been asked to expand.
  - Shoeburyness – school has agreed to expand by 1fe permanently and a 1fe one year bulge from September 18, a building project is currently at tender stage.
  - St Thomas Moore – school has agreed to expand by 1fe from September 2018, project is in feasibility stage.
  - St Bernard's – school is willing to expand and the local authority is negotiating admission arrangements and whether they will meet local need.

- Eastwood – school have consulted on expansion and the local authority have asked for feasibility study with costs. No confirmation of date of expansion or numbers of increased PAN have been agreed.
  - Belfairs – school are not in favour of expanding but as they are not currently meeting catchment demand are undertaking a feasibility study for up to 2 FE.
  - Cecil Jones – the academy has agreed to increase its numbers by 20 pupils from September 2019 following an agreement of Basic Need funding to support additional capital works.
  - Chase – discussions around expansion have taken place but the school does not expect to be given Good status till 2019. Negotiations will be revisited at that time.
  - Southchurch - discussions around expansion have taken place but the school is currently underachieving. Negotiations will be revisited at that time.
- An Academy Trust has agreed to take a Free School application forward if a suitable site can be found. Work on this is being progressed by the Assets Team.

**2. Evidence Base**

2.1 Please list sources of information, data, and results of consultation exercises that could or will inform the EA.

Source of information	Reason for using (eg. likely impact on a particular group).
Shoeburyness High School Expansion Consultation	This consultation was run by the school as part of their expansion. It will inform both the School and the LA of local opinion.
Other School Consultations as they are run	All school expansions require a stakeholder consultation. As academies the schools will run them and the responses shared with the Local Authority.

Pease Note: reports/data/evidence can be added as appendices to the EA.

2.2 Note: Useful sources of data/information include:

- [Southend Insights](#): Providing key information, data and intelligence about Southend residents. It also acts as Southend's Joint Strategic Needs Assessment (JSNA).

- Results of consultation and engagement activities such as surveys that will help you understand the needs or experiences of different groups. This could be done by:
  - Analysing the demographic (equality monitoring) data
  - Consultation activities with specific groups such as staff forums (OUTreach, BAME and Disability Forms).
  - Refer to the [Consultation Portal](#) for details of public and staff consultations carried out by the Council.
- Customer feedback surveys:
- [Mosaic](#): Providing a wide range of household and individual geographic and demographic data from a range of governmental and commercial sources;
- [Govmetric](#): measurement of customer satisfaction:
- [Equality & Human Rights Commission](#)
- [Disability Rights](#)
- [Stonewall](#)

**2.3 Identify any gaps in the information and understanding of the impact of your policy, service function or restructure. Indicate in your action plan (para 5) whether you have identified ways of filling these gaps.**

**Community impact of a new secondary school can be both negative and positive. All areas are to be monitored as plans progress. It should be noted however that locations for a new secondary school are very limited. This means that even if the impact is expected to be high, to provide the new places needed this will have to be accepted and mitigated as much as possible.**

### **3.0 Analysis**

3.1 An analysis and interpretation of the impact of the policy, service function or restructure should be undertaken, with the impact for each of the groups with '*protected characteristics*' and the source of that evidence also set out against those findings.

3.2 'Protected Groups (also known as groups with 'Protected Characteristics'):

The [Equality Act 2010](#) introduced the term '**protected characteristics**' to refer to groups that are protected under the Act. These groups are: age, disability, gender reassignment, marriage and civil partnerships, maternity/pregnancy, race, religion and belief, sex, sexual orientation.

3.3 In addition, the Council has identified the need to assess the impact of a policy, service function or restructure on carers, looked after children (as part of the age characteristic) as well as the socioeconomic impact of different groups, such as employment classifications.

Note: Summary socio economic classifications include:

- [Occupational socio-economic classification \(simple\)](#)
- [ONS socio economic classifications \(more detailed\)](#)

**3.4 Initial assessment of a perceived impact of the policy, service function or restructure. The impact can be positive or negative (or in some circumstances both), none or unclear:**

	Impact - Please tick				
	Yes			No	Unclear
	Positive	Negative	Neutral		
<b>Age (including looked after children)</b>	X				
<b>Disability</b>	X				
<b>Gender Reassignment</b>				X	
<b>Marriage and Civil Partnerships</b>				X	
<b>Maternity/Pregnancy</b>				X	
<b>Race</b>				X	
<b>Religion and Belief</b>				X	
<b>Sex</b>				X	
<b>Sexual Orientation</b>				X	
<b>Carers</b>	X				
<b>Socio-economic</b>				X	

**3.5 Where an impact has been identified above, outline what the impact of the policy, service function or restructure on members of the groups with protected characteristics below:**

**Age (including looked after children)**

The purpose and practice of this process is to improve the chances that school age children are offered a place within their catchment area. Looked after Children are not affected by any changes to catchment as these children are the top priority criteria for primary and secondary schools admissions as required by the statutory code

## **Disability**

By increasing capacity at local schools the need to travel will be reduced along with the risk of having different siblings at different schools.

## **Carers**

By increasing capacity at local schools the need to travel will be reduced along with the risk of having different siblings at different schools.

## **4. Community Impact**

### **4.1 You may also need to undertake an analysis of the potential direct or indirect impact on the wider community when introducing a new/revised policy, service function or restructure.**

The overall expected community impact of this process will be to improve the chances of parents obtaining a school place for their child in the catchment area where they live.

A new secondary school, in a location yet to be identified, could lead to impacts on the community in areas of traffic, new roads, noise to nearby residents who were resident there before the school opened and higher numbers of all age groups moving around the area.

This could be both negative and positive impacts and these will have to be looked at in greater detail once the location is agreed to match these issues to the community being impacted.

The current agreed expansion at Shoeburyness High School will allow local pupils to attend their local school, thus reducing the need to travel out of their area.

This effect will also be seen at the other non-selective schools who have agreed to expand.

The places being planned at local faith schools will attract Southend residents but as this will be from across the borough increased numbers traveling could be seen.

### **4.2 You can use the [Community Cohesion Impact Assessment](#) as a guide, outlining a summary of your findings below:**

**5. Equality Analysis Action Plan**

5.1 What actions have you considered/taken to mitigate unlawful prohibited conduct or unwanted adverse impact, or to promote improved equality of opportunity or good relations?

**Considerations**

- Ensure that the schools expanding are in the areas of demand.
- Ensure that the places required are supplied by the time they are needed.
- Ensure that all the issues a new school could cause are flagged and mitigated where possible.

5.2 Set out what action will be taken to ensure  
 - A full analysis of the impact of the policy, service function or restructure is undertaken and/or  
 - What action will be taken to mitigate/address identified negative impacts

**Action to be taken to mitigate negative impacts**

<b>Planned action</b>	<b>Objective</b>	<b>Who</b>	<b>When</b>	<b>How will this be monitored (eg via team/service plan)</b>
<b>Ensure expansions are where needed</b>	Make supply equal demand as close as possible	All	Ongoing	<b>Regular meetings and monitoring</b>
<b>Ensure places are available on time</b>	Make sure all timelines are accurate.	All	Ongoing	<b>Regular meetings and monitoring</b>
<b>Ensure community issues that arise are dealt with sympathetically</b>	Reduce community impact of a new school to a minimum	All	Ongoing	<b>Regular meetings and monitoring</b>

5.3 How will the action plan be monitored?

Through regular review meetings

Signed: Catherine Braun, Group Manager

Head of Service: .....

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**Southend-on-Sea Borough Council**  
**Report of Deputy Chief Executive (People)**  
**to**  
**Cabinet**  
**on**  
**19<sup>th</sup> September 2017**

Report prepared by: Brin Martin, Director of Learning

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**School Performance Report Summer 2017 (Outcomes KS2 & KS4)**  
**People Scrutiny Committee**  
**Executive Councillor: James Courtenay**  
***A Part 1 (Public) Agenda Item***

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**1. Purpose of Report**

- 1.1 This report informs Cabinet of the high level performance outcome for all Southend schools at all key stages following the summer tests and examinations.

**2. Recommendations**

- 2.1 That Cabinet notes the overall performance of Southend schools at each of the key stages, in particular relative to the emerging national benchmarks.

**3. Background**

- 3.1 In previous years, Cabinet has not been sighted upon the early outcomes achieved by schools in the summer teacher assessments, tests and examinations.
- 3.2 It should be stressed that at this stage, the majority of the outcomes are “raw” and unvalidated. Whilst the overall scores are unlikely to change significantly, results for individual schools may fluctuate.
- 3.3 Results for individual schools are not in the public domain until validated, later in the autumn term. However, in view of likely press interest, it is important that Cabinet are aware of the emerging picture.
- 3.5 Lastly, it should be remembered that at GCSE level (year 11 of secondary schools), this will be the first year of new transitional assessment arrangements, moving from a lettered system to a numbered system (9-1, one being lowest) in English and Mathematics only. In essence, the previous benchmark of a “C” grade, regarded as a pass, is now broadly equivalent to either a grade 4, a standard pass, with a 5 regarded as a strong pass.

**4. Headline Performance Outcomes**

**4.1 Across all key stages**

- 4.1.1 Cabinet should note that in almost all of the benchmark outcomes, at all key stages, Southend pupils continue to outperform the national averages, in some cases increasing at a higher rate than all schools nationally.
- 4.1.2 For each key stage where available, as indicated in appendix one, results are shown for the headline measurements, and for vulnerable groups of pupils with Special Educational Needs and deprived pupils against their peers.

## 4.2 By Key Stages

- 4.2.1 In the **Early Years**, the % of pupils achieving a good level of development is 74.3% (70.7% nationally), an increase of 3% points from 2016. 20 schools showed an improvement. **Improvement on last year, above the national.**
- 4.2.2 At the end of **Key Stage One** (infant primary), the percentage of Southend pupils achieving the expected standard or above in combined reading, writing and maths is 66.6% which is an increase of 3.5 percentage points compared to 2016. The emerging national based on results from 152 LA's for KS1 reading, writing and maths combined is 63.7% an increase of 3.4 percentage points compared to 2016, this means the Southend figure is currently 2.8 percentage points higher than the emerging national picture. **Improvement upon last year, above the national.**

The percentage of pupils achieving the expected standard or above in reading, writing and maths improved in 19 schools with 6 schools improving by more than 10 percentage points compared to 2016 results. The percentage of pupils achieving the expected standard or above fell in 9 schools.

- 4.2.3 The percentage of Southend pupils at the end of **Key Stage Two** (junior primary) achieving the expected standard or above in combined reading test, writing TA and maths test is 65% this is an increase of 9.2 percentage points compared to 2016. The interim national results of pupils achieving the expected standard or above in combined reading test, writing TA and maths test is 61%, an increase of 8.0 percentage points compared to 2016. **Improvement upon last year, above the national.**

Overall the Southend figure is 3.9 percentage points higher than the interim national results. The percentage of pupils achieving the expected standard or above improved in 23 schools (nearly 80%) compared to 2016 results, with 17 schools improving by over 10.0 percentage points when compared to their 2016 results. The percentage of pupils achieving the expected standard or above fell in 6 schools compared to their 2016 results with 2 schools dropping by over 10.0 percentage points.

- 4.2.4 At **Key Stage Four** (secondary CGSE), results have only just been announced, and at the time of drafting this report, they are still both subject to variation, and have not yet been provided for all headline measures by the department. As mentioned in 3.5 above, the means of calibrating outcomes is in the first year of transition. In essence, the previous benchmark of A\*-C in both English and mathematics is broadly equivalent to the new numerical measure of a grade 4 or better in both subjects.

From the data obtained so far, **72.3% of pupils achieved the new benchmark of 4+ in the combined subjects.** This is compared to 69% for the similar measure last year. Equally last year, the national figure was 63%, and we understand that this may have reduced slightly this year. If this is the case, not only have Southend schools improved on last year, but they also buck the national trend.

Of the 12 schools 8 showed either sustained results (ie 100%) or improvement, and 4 declined (two by less than two percentage points). We do not at this stage publically share individual school data until validated, but several schools, including two of our more vulnerable schools have shown significant improvement, whilst several of our other non-grammar schools have also sustained significantly high results from last year.

- 4.2.5 At **Key Stage Five** (end of sixth form), provisional results were 11.4% of A-level entries were A\* compared to the national average of 8.3%, and 35.8% of entries were A\* or A grades, compared to national figures of 26.3%, with 98.5% of all grades being A\*- E grade, above the national equivalent of 97.9%. **Improvement upon last year, above the national.**

Based on comparative data from results day last year, there has been an improvement in all measures in Southend (last year saw the rate of entries at A\* at 8.2%, A\*-A at 29.6% and A\*-E at 98.4%).

## 5. Conclusion and implications

- 5.1 At all Key Stages, Southend schools continue to both improve and outperform against national benchmarks. Whilst we await the individual validated school results, we anticipate that Southend Borough as a whole will continue to improve its rankings nationally and in relation to our statistical and geographical neighbours.
- 5.2 These results will inform the Education Board, and in particular the School Performance Sub Group, in their detailed analysis of both outcomes and progress data through the schools risk register. In turn, the risk register is used to target intervention in schools requiring support and challenge to improve further in particular areas or with specific groups.
- 5.3 This support will be undertaken through our partnership between officers and the local Teaching School, and take the form of focussed support at individual school level, or through improvement programmes such as the narrowing the gap project at Key Stage Two, or the initiative to encourage more Southend residents to attend one of the four Grammar Schools if appropriate. All of these initiatives are funded through the school improvement money allocated by Council in the budget.

## 6. Corporate Implications

### 6.1 Contribution to Council's Vision & Corporate Priorities

Ensure residents have access to high quality education to enable them to be lifelong learners and have fulfilling employment.

### 6.2 Financial Implications

None

### 6.3 Legal Implications

None

### 6.4 People Implications

None

### 6.5 Property Implication

None

### 6.6 Consultation

None required

6.7 Equalities and Diversity Implications

None

6.8 Risk Assessment

Not required

6.9 Value for Money

Not applicable

6.10 Community Safety Implications

Not applicable

6.11 Environmental Impact

None required

**7. Background Papers**

None

**8. Appendices**

Appendix 1: 2017 Provisional School Performance Outcomes for Southend Schools

**2017 Attainment Summary – Provisional (16/08/2017)**

**EYFS Summary 2017**

**All pupils**

- The percentage of pupils achieving a Good Level of Development (GLD) in Southend schools is 74.3%, an increase of 3 percentage points from 2016.
- The emerging national picture, based on 151 LA's, is 70.7% which is 1.4 percentage points higher than in 2016. If this outcome is maintained in the final publication, the improvement in Southend will be more than double that of the national performance.
- The percentage of pupils achieving GLD improved in 20 Southend schools with 5 schools improving more than 10 percentage points from 2016 results. The greatest improvement was 13.3 percentage points.
- The percentage of pupils achieving GLD fell in 8 schools with the largest decline being almost 27 percentage points.
- The average total points score (TPS) fell from 36.6 to 36.2 in Southend but remains well above the emerging national average of 34.4 (based on 142 LA's submitting data).

**Disadvantaged**

- The percentage of disadvantaged pupils that achieved GLD increased by almost 3 percentage points when compared to 2016, up to 61.5%.
- The gap in the percentage of pupils achieving GLD between disadvantaged and non-disadvantaged pupils reduced by 1 percentage point since 2016 to 15.1 percentage points.

**SEN**

- The percentage of pupils with SEN that achieved GLD increased by 10 percentage points compared to 2016, up to 21%. The gap in percentage between these pupils and those with no SEN achieved GLD decreased by almost 8 percentage points and now stands at 58.3 percentage points
- The percentage of pupils with SEN Support achieving GLD almost doubled between 2016 and 2017 (up to 29.8%) and there was also an improvement in the attainment of pupils with a statement/EHCP (now at 3.2% compared to 0% last year).

### **Year 1 Phonics Summary 2017**

#### **All pupils**

- The percentage of year 1 pupils meeting the expected phonics standard in Southend schools is 81.5%, an increase of 1.7 percentage points from 2016.
- The emerging national picture, based on 152 LA's, is 81.3% which is 0.3 percentage points higher than in 2016. If this level is maintained as all Local Authorities submit their data, the 2016 gap between Southend and national performance will have been closed but Southend schools' performance will still exceed the national position.
- The percentage of pupils meeting the phonics standard improved in 18 Southend schools with 2 schools improving by 10 percentage points or more in relation to the 2016 results. The greatest improvement was 14.3 percentage points.
- The percentage of pupils meeting the phonics standard fell in 10 schools with the largest decline being almost 17 percentage points.

#### **Disadvantaged**

- The percentage of year 1 disadvantaged pupils meeting the expected phonics standard in Southend schools is 70.3%, an increase of almost 5 percentage points from 2016.
- The gap between disadvantaged and non-disadvantaged pupils meeting the expected phonics standard in Southend is 14.4%, a significant improvement on the 2016 gap of 18.1%.
- The percentage of disadvantaged pupils meeting phonics standards varies considerably from school to school. With schools that have a cohort of at least 30 disadvantaged pupils this percentage ranges from 53.1% to 79.4%.

#### **SEN**

- The gap in the percentage of pupils that are working at the phonics expected standard between those receiving SEN Support and pupils with no special education needs is 50.8%. For pupils with a statement or EHC plan this increases to 68.7%.
- For pupils with any SEN the overall percentage of those working at the expected phonics standard has increased since 2016 by over 2 percentage points although the gap when compared to pupils without SEN has remained at 56%.

### **KS1 Summary 2017**

#### **All pupils**

- The percentage of Southend pupils achieving the expected standard or above in combined reading, writing and maths is 66.6% which is an increase of 3.5 percentage points compared to 2016.
- The emerging national based on results from 152 LA's for KS1 reading, writing and maths combined is 63.7% an increase of 3.4 percentage points compared to 2016, this means the Southend figure is currently 2.8 percentage points higher than the emerging national.
- The breakdown for each subject is reading (78.2%), writing (71.2%) and maths (76.9%) – Southend is above the emerging national average in each subject and has improved on last year's outcomes.
- 20 Southend schools are currently performing better than national the combined measure of reading, writing and maths.
- The percentage of pupils achieving the expected standard or above in reading, writing and maths improved in 19 schools with 6 schools improving by more than 10 percentage points compared to 2016 results. The greatest improvement was 26.3 percentage points.
- The percentage of pupils achieving the expected standard or above in reading, writing and maths fell in 9 schools with the largest decline of 18.3 percentage points.

#### **Disadvantaged**

- The percentage of disadvantaged pupils achieving at least the expected standard in reading, writing and maths was 50.7%, an improvement of over 4 percentage points compared to 2016 results. The attainment of disadvantaged pupils in reading, writing and maths combined exceeded the 2016 performance in 21 out of 29 schools.
- The attainment gap between disadvantaged and non-disadvantaged pupils for achieving the expected standard in combined reading, writing and maths was 20.4%. This is an improvement on the 2016 gap, which was 22.2%.
- Individually, the largest gap was in writing (19.3%), followed by maths (18.1%) and reading (17.3%).

#### **SEN**

- The percentage of Southend pupils with SEN achieving the expected standard or above in combined reading, writing and maths is 10% which is an increase of 2 percentage points compared to 2016. The improvement in attainment for pupils receiving SEN Support and for those with a statement or EHC plan is 0.9 percentage points and 4.8 percentage points respectively.
- The percentage of pupils with a statement or EHC plan achieving the expected standard has fallen since 2016 in relation to each separate subject of reading, writing and maths. This was most notable in maths where there was a 10.2 percentage point drop in attainment from 2016, increasing the attainment gap in mathematics between pupils with a statement or EHC plan and those with no SEN to 76.2%.
- The attainment gap between pupils with a statement or EHC plan and pupils with no SEN has widened in each of the above subjects. This is also the case with pupils receiving SEN Support.

## **KS2 Summary 2017**

### **All pupils**

- The percentage of Southend pupils achieving the expected standard or above in combined reading test, writing TA and maths test is 65% this is an increase of 9.2 percentage points compared to 2016.
- The interim national results of pupils achieving the expected standard or above in combined reading test, writing TA and maths test is 61%, an increase of 8.0 percentage points compared to 2016. Overall the Southend figure is 3.9 percentage points higher than the interim national results.
- Individually, the outcomes were 73.7% in reading, 78.4% in writing, 76.4% in maths and 79.4% in grammar, punctuation and spelling. These outcomes were above the national average in each subject.
- 21 Southend schools are currently performing in line or above the interim national results for pupils achieving the expected standard or above in combined reading test, writing TA and maths test.
- The percentage of pupils achieving the expected standard or above in combined reading test, writing TA and maths test improved in 23 schools (nearly 80%) compared to 2016 results, with 17 schools improving by over 10.0 percentage points when compared to their 2016 results. The greatest achievement is shared between 2 schools improving by over 30 percentage points compared to their 2016 results.
- The percentage of pupils achieving the expected standard or above in combined reading test, writing TA and maths fell in 6 schools compared to their 2016 results with 2 schools dropping by over 10.0 percentage points.

### **Progress**

- The emerging KS1-2 progress for all Southend pupils is better than their peers nationally with a positive progress score of 0.3 for reading, 0.3 for writing and 0.3 for maths.
- For KS1-2 reading progress 19 schools had positive progress scores with 4 significantly above national average.
- For KS1-2 writing progress 18 schools had positive progress with 6 schools significantly above national average.
- For KS1-2 maths progress 20 schools had positive progress with 7 schools significantly above national average.

### **Disadvantaged**

- The percentage of disadvantaged pupils achieving the expected standard or above in combined reading test, writing TA and maths test was 49.6%, an improvement of almost 10 percentage points compared to 2016 results.
- The attainment gap between disadvantaged and non-disadvantaged pupils for achieving the expected standard in combined reading, writing and maths was 22.9%. This is an improvement on the 2016 gap, which was 24%.
- The 8 schools that had a gap between disadvantaged and non-disadvantaged pupils above the Southend overall figure each had a gap of over 30% with the greatest being 44.2%.

### **SEN**

- The percentage of Southend pupils with SEN achieving the expected standard or above in combined reading test, writing TA and maths test is 14.4% which is an increase of 6.5 percentage points compared to 2016. The improvement in attainment for pupils receiving SEN Support and for those with a statement or EHC plan is 7.7 percentage points and 4.9 percentage points respectively.



## Appendix 1

- The most significant improvement in test results has been in maths where pupils with SEN Support showed a 12.5 percentage point improvement since 2016 in relation to the percentage of pupils achieving at least the expected standard.
- The poorest comparative test result was in relation to pupils with a statement or EHC plan in maths where there was a 0.7 percentage point drop in attainment from 2016, increasing the attainment gap in mathematics between pupils with a statement or EHC plan and those with no SEN to 70.1%.
- The attainment gap between pupils with a statement or EHC plan and pupils with no SEN has increased in every subject, including test results, teaching assessments and scaled scores.
- The attainment gap between pupils with SEN Support and pupils with no SEN has improved in relation to reading, writing, maths and grammar, punctuation and spelling.

**KS4 Summary 2017**

- High level summary data from results day suggests that 72.3% of students in Southend schools achieved grade 4 or above in English and maths at GCSE. Grade 4 is the threshold considered to be a 'standard pass' by the Department for Education and the bottom of this grade aligns with the bottom of the previous C grade. Although comparisons with previous years should be treated with caution, this shows an improvement from 2016, when 69% of students achieved C or above in both English and maths.
- There were notable increases in the combined English and Maths basics measure for 2 schools of 16 percentage points and 12 percentage points. Overall, 5 schools saw an improvement of more than 1 percentage point, with 3 schools declining by the same margin.
- Based on provisional results from 10 schools, 83.9% of pupils achieved grade 4 or above in English and 80.0% of pupils achieved this in maths. Although these figures are subject to dip slightly, it suggests an improvement from last year when 82% of pupils achieved A\*-C in English and 75.6% achieved A\*-C in maths. The national data released by the JCQ indicates that 64.9% of pupils achieved grade 4 or above in English Language, 72.0% achieved this in English Literature and 68.9% achieved this in maths.
- 99.5% of pupils in these 10 schools achieved at least 1 GCSE.
- Based on provisional results from 9 schools, 75.9% of pupils achieved grade 5 or above in English and 69.5% of pupils achieved this in maths.
- In the English Baccalaureate measure, data was only received from 8 schools. The provisional data shows 44.2% of pupils entered the EBACC, with 36.6% achieving based on 4-9 in English and 32.6% achieving based on 5-9 in English.
- The provisional Attainment 8 score for the 8 schools that submitted data was 54.5 (last year's Southend figure was 53.5).

**KS5 Summary 2017**

- High level summary data from results day suggests that 11.4% of A-level entries were A\* compared to the national average of 8.3%, 35.8% of entries were A\* or A grades, compared to national figures of 26.3%, with 98.5% of all grades being A\*- E grade, above the national equivalent of 97.9%. Please note this excludes data from one school who did not share their results. Figures are not comparable to the DfE headline measures for KS5 which are released in the autumn term.
- Based on comparative data from results day last year, there has been an improvement in all measures in Southend (last year saw the rate of entries at A\* at 8.2%, A\*-A at 29.6% and A\*-E at 98.4%).

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**Southend-on-Sea Borough Council**  
**Report of Deputy Chief Executive (People)**  
**to**  
**Cabinet**  
**on**  
**19<sup>th</sup> September 2017**

Report prepared by: Catherine Braun – Group Manager  
Access and Inclusion

**Agenda  
Item No.**

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**Coordinated Admission Scheme for Academic Year 2019/20**  
**Executive Councillor: Councillor James Courtenay**  
**People Scrutiny Committee**  
***A Part 1 (Public) Agenda Item***

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**1. Purpose of Report**

- 1.1 To agree in principle the Coordinated Admissions Scheme for 2019 onwards and to agree the mechanism for the final agreement of the scheme.
- 1.2 To agree to the Published Admission Limits for community schools and for a consultation confirming any changes with schools.

**2. Recommendations**

- 2.1 To approve a consultation with governing bodies of community schools takes place on the published admission numbers for community infant, junior and primary schools for September 2019 as set out in Appendix 1
- 2.3 To approve the proposed Coordinated Admissions Scheme for 2019 onwards. Appendix 2 to be agreed in principle by Council, and if there are minor areas to be resolved following consultation with all schools that decisions on minor amendments be delegated to the Deputy Chief Executive (People) and the Executive Councillor for Children & Learning.

**3. Background**

- 3.1 The Council has the responsibilities to determine in relation to school admissions:
  - a) The Admission Arrangements for Community Schools (admission numbers, admission criteria and catchment areas); **The Council is currently undertaking early phase one consultation with the community on admission criteria and catchment areas and as such the report and proposals for formal consultation will be identified through a special cabinet meeting in October 2017.**
  - b) The Coordinated Admissions Scheme, which sets out the way in which admissions for all schools (including academies and other own admission authority schools) will operate.

- 3.2 A reminder that there is a statutory duty to determine and publish a Coordinated Scheme which lays out the policy on the main admission rounds. The School Admissions Code 2014, item 15 states:

*“Admission authorities **must** set (‘determine’) admission arrangements annually. Where changes are proposed to admission arrangements, the admission authority **must** first publicly consult on those arrangements. If no changes are made to admission arrangements, they **must** be consulted on at least once every 7 years... consultation must be for a minimum of 6 weeks and **must** take place between **1 October and 31 January** of the school year before those arrangements are to apply”.*

- 3.3 For community schools, the local authority (as the admission authority) **must** consult if it proposes to change the admission arrangements for community schools and Cabinet is reminded that the consultation is underway and a meeting in October will be presented with the outcome of the initial parental engagement phase of the consultation and recommendations for formal consultation.

- 3.5 For community schools, the local authority (as the admission authority) **must** consult the governing body of each school where it proposes either to increase or keep the same PAN.

- 3.4 Schemes for coordinating all admission applications to schools must be formulated and submitted to the Department for Education (DfE) by 1<sup>st</sup> January in the determination year, which for the school year starting in September 2019 will be 1st January 2018.

- 3.5 Admission Forum approved the recommended changes at their meeting of 25<sup>th</sup> May 2017.

#### **4. Other Options**

Not applicable

#### **5. Reasons for Recommendations (Admission Arrangements 2019/20)**

##### 5.1 Admission Criteria

- 5.1.1 Cabinet is reminded that the consultation is underway and a special cabinet meeting in October will be presented with the outcome of the initial parental engagement phase of the consultation.

##### 5.2 Published Admission Numbers

- 5.2.1 There are currently no proposed changes to the Admission Limits from 2019/20 however, Governing Bodies of community schools will have the opportunity to inform the local authority if they wish to comment. The proposed admission limits for all community primary schools for September 2018 are shown in **Appendix 1**.

##### 5.3 Primary and Secondary Co-ordinated Admissions Scheme for the September 2019 round of admissions

- 5.3.1 Consultation rules for coordinated arrangements require the local authority to consult with other admission authorities in the area and other local authorities if there are changes from the previous year’s scheme. The changes proposed for 2019 are as follow in 5.1.1 –

Item on scheme (and page)	Addition/change
1.1 (pg 3)	(add) Determined admission arrangements to be provided to the LA, for the inclusion in the composite prospectus, with the date and minute number from the Trust/LGB meeting.
After 4.1.15 add	<p>(add)</p> <p>4.1.16 SEN pupils will be accommodated if the named school is identified in the finalised EHCP by 15<sup>th</sup> February for Secondary and 27<sup>th</sup> March for Primary (or next working day) of any given year.</p> <p>4.1.17 SEN and LAC pupils may need to be admitted over number on initial allocation (for offer day) and the School Admissions Team will manage the school back to the PAN until the last week of August at which time the Academy takes over.</p>
4.1.23	<p>(change)</p> <p>Offers are automatically recorded as 'accepted' and parents will be given 10 school days to notify the LA if they wish to reject an offer of a school place. Parents who applied online will be able to do this by using the online facility.</p>
4.2.2 & 4.2.5 & 4.2.6	<p>Change to Summer born policy</p> <p>Parents may submit requests to the LA for any community schools and directly to own admission authorities for Academy schools.</p> <p>Any decision will seek an outcome in the best interest for the child and for community schools will be considered by a Panel of relevant persons. Parents applying for schools outside the Borough of Southend will need to consult the respective LA's policy in this regard.</p> <p>The following items apply to the LA, for community schools only:-</p> <p><b>The following items apply for all applications, LA or OAA decision:-</b></p> <p>4.2.6 If the parents case for delayed admission into reception is upheld by the panel, or the Own Admission Authority a new application for a place in the next cohort <b>must</b> be made in the following round (between September and mid-January) and would be considered along with all the other applicants for admission in that year. There would be no guarantee that a place would be offered in the preferred school.</p>
4.3.4	Clarity only
4.5.1	Clarity only
4.6.2	<p>(add )</p> <p>4.6.2 Change of address/New applications for selective places</p> <p>Due to the high variations of address policies across the various LAs and own admission authorities, regardless of home LA, addresses for selective and partially selective places for schools in Southend-on-Sea are as per the child's normal place of residence (address) as at the closing date for Secondary Admissions (31st October). Any address changes after the closing date are updated</p>

	after offer day (1st March) and the applications ranked accordingly.
4.8	Clarity
4.8.8	<p>New item to be included</p> <p>4.8.8 All admission authorities must specify, in their arrangements, the period a child remains on a waiting list for each school year. For main round Reception, year 3 and year 7 it must be at least to Dec of the admission year.</p> <p>Community school waiting lists are held for the full school year that the application was made. Waiting lists, for all year groups close on the last day of the school year. Parent must reapply for the new school year from the start of the Summer Term if they wish to be added to the waiting list for the next school year.</p>

5.3.2 Consultation on the scheme will be necessary and approval is required from all schools. Failure to have a determined coordinated admission scheme will mean that a scheme is imposed by the Secretary of State.

#### 5.4 Approval Process

5.4.1 That the Co-ordinated Admissions Scheme for the academic year 2019 onwards be approved in principle by Cabinet. If, following consultation with schools there are minor issues to be resolved, in order to meet the requirement to submit this to the Department for Education (DfE) by 1<sup>st</sup> January, that decisions on minor amendments be delegated to the Deputy Chief Executive (People) and the Executive Councillor for Children & Learning.

5.4.2 The Council will then write to all schools requesting their approval to the scheme. DfE guidance assumes that schools agree if they do not respond.

5.4.3 The Council is undertaking a separate process for the consultation on the admission arrangements which include the catchment areas.

5.4.4 The Council will consult individually the Governing Bodies of community schools as required for increased or unchanged PAN's.

5.4.5 A report will be made to the January Cabinet formally to approve the PAN's and to formally determine the admission arrangements.

## 6. Corporate Implications

### 6.1 Contribution to Council's Vision & Corporate Priorities

These arrangements will assist pupils within the Borough to access quality learning opportunities to achieve the best possible outcomes for all children.

### 6.2 Financial Implications

There are no direct financial implications for the Council. The administration of school admissions is funded from the Dedicated Schools Grant.



### 6.3 Legal Implications

The determination of admission arrangements for community schools and the provision of a coordinated admissions scheme is a statutory requirement.

### 6.4 People Implications

None

### 6.5 Property Implications

None

### 6.6 Consultation

The admission arrangements and the coordinated scheme were considered by the Admission Forum at a meeting on 25<sup>th</sup> May 2017. The forum were in agreement with the proposed changes to the coordinated scheme. Individual Governing Bodies to be consulted as at paragraph 3.3.

### 6.7 Equalities and Diversity Implications

A co-ordinated admissions scheme and clear oversubscription criteria are necessary to ensure fair access to school places.

### 6.8 Risk Assessment

If the Council does not agreed a scheme, one will be imposed by the DfE, and the Council's reputation will suffer.

### 6.9 Value for Money

No direct implications.

### 6.10 Community Safety Implications

None envisaged.

### 6.11 Environmental Impact

None envisaged.

## 7. **Background Papers**

- 7.1 School Admissions Code 2014 —  
<https://www.gov.uk/government/publications/school-admissions-code--2>  
and School Admission Appeals Code 2012 -  
<https://www.gov.uk/government/publications/school-admissions-appeals-code>

## 8. Appendices

- 8.1 Appendix 1 - Published Admission Numbers.

- 8.2 Appendix 2 - Proposed Co-ordinated Admissions Scheme for September 2019 onwards.

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# The Co-ordinated Admissions Scheme for 2019/20

*Office use: approval route*

Admission forum:	25 <sup>th</sup> May 2017
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## **1. Introduction**

- 1.1 The School Admissions Code places a duty on local authorities to formulate a single scheme for co-ordinating all applications to all publically funded schools from parents in their area. In the Borough of Southend-on-Sea, the scheme applies to admissions into reception, year 3 and year 7. Schemes for admission to schools must be formulated by 1<sup>st</sup> January in the determination year.
- 1.2 Determined admission arrangements to be provided to the LA, for the inclusion in the composite prospectus, with the date and minute number from the Trust/LGB meeting.

## **2. Aims and scope of the scheme**

### **2.1 Aims of the scheme**

- 2.1.1 To facilitate the offer of one school place to each pupil.
- 2.1.2 To simplify for parents the admission process into schools through the use of a Common Application form (CAF).
- 2.1.3 To co-ordinate with neighbouring local authorities to avoid more than one school place being allocated to the same pupil.

### **2.2 Scope of the Scheme**

- 2.2.1 The scheme applies to families who are resident in Southend who are seeking admission into: reception year in primary and infant schools; year 3 in primary and junior schools and year 7 in secondary schools. The scheme excludes post 16 pupils.

## **3. Key Aspects of the Scheme.**

- 3.1 There will be co-ordination with other local authorities to ensure that a pupil only receives one offer.
- 3.2 Southend Borough Council (SBC) will co-ordinate admissions, for all schools including academy, community, foundation, free school and voluntary aided schools. Co-ordination is for all pupils into reception year, year 3 and year 7.
- 3.3 SBC will send offers of places to Southend residents even if the school is in another local authority. This includes offers on behalf of academy, community, foundation, free school and voluntary aided schools.
- 3.4 The CAF will enable parents to express:
- up to 3 preferences for admission to a primary school; or
  - up to 5 preferences for admission to a secondary school.
- 3.5 Only SBC will know the ranking of the parental preferences. Preferences will be shared with other local authorities in so far as they relate to their schools. Parental preferences may be shared with own admission authorities for the purposes of admission appeals.

3.6 In all cases academies, foundation, free school and voluntary aided schools will continue to be their own admission authorities, will apply their own criteria and will continue to be responsible for the organising of admission appeals.

#### **4. General details of the scheme**

4.1 Primary and secondary admissions up to the offer date

4.1.1 Parents will complete a Common Application Form (CAF) on which they will be able to express a preference for up to:

- 3 primary schools in order of priority; or
- 5 secondary schools in order of priority.

4.1.2 Parents will be advised to apply on-line for a school place at [www.southend.gov.uk/admissions](http://www.southend.gov.uk/admissions) but will be able to complete a paper common application form if they wish.

4.1.3 All CAFs must be sent to SBC which is the only body that can make offers to Southend parents on behalf of primary and secondary schools.

4.1.4 Alerts of pupils that have not applied will be made available to current settings, on request from Nursery Schools, but completed by default with schools to identify any barriers preventing on-time applications being submitted.

4.1.5 Parents can express a preference for a school in another local authority as Southend co-ordinates admissions with other authorities. The offer of a place at a school in another local authority will be made by SBC on behalf of that local authority. Similarly other local authorities will offer places to their residents on behalf of Southend schools. The scheme requires councils to liaise before any offers are made on behalf of schools in the other council area.

4.1.6 The Southend coordinated scheme considers all preferences against the admissions criteria for the individual schools.

4.1.7 The CAF will detail which schools also require Supplementary Information Forms (SIFs). These may be obtained from either the school or the website. SIFs must be sent back to the individual school. SIFs for the Consortium of Selective Schools in Essex (CSSE) need to be downloaded from the CSSE website or by contacting the CSSE and completed forms need to be returned to the CSSE. These forms are not application forms and parents must complete the CAF. (See section 4.7 on SIFs and section 4.1.6 for the SIF for the Consortium of Selective Schools in Essex).

4.1.8 For each admission round there is a national closing date for receipt of the CAF. The deadline for receipt of any SIFs is set by individual schools and the Consortium of Selective Schools in Essex (CSSE). The date may be later than the national closing date. For registration for the selective test the closing date will be much earlier. Parents are encouraged to send in the CAF to SBC and any SIFs (if required) to the school as early as possible prior to the closing date.

4.1.9 If SBC receives any SIFs these will be forwarded onto the school or, where appropriate CSSE. Similarly if any school receives by mistake any CAFs these must be sent onto SBC.

- 4.1.10 Preliminary lists will be shared with voluntary aided schools to check CAFs against SIF's submitted.
- 4.1.11 On-line applications will be downloaded into the admissions database. SBC will input into the admissions database all information shown on any paper CAF's, including any reasons for the application, and will provide details to all academy, foundation, free school and voluntary aided schools.
- 4.1.12 SBC will send to other local authorities details of pupils who have applied to schools in their area and will receive from other local authorities details of their pupils who have applied to Southend schools. The respective councils will send to their own schools a list of pupils who have applied to the school which will include both Southend and their own residents. It has been agreed by schools that are part of the CSSE that both SBC and Essex will send information on those pupils who have applied to take the selective test direct to the consortium.
- 4.1.13 Pupils taking the selective test, or aptitude tests or auditions will need to register with CSSE or schools to make the necessary arrangements.
- 4.1.14 Academy, foundation, free school and voluntary aided schools and, where appropriate CSSE, are required to rank in order of the schools' criteria **all** pupils who have applied to their school and to return these lists to SBC by the agreed date. Applications that are not matched to a SIF (or where there is no SIF), must still be ranked.
- 4.1.15 SBC will exchange information with other Local Authorities who will provide details of the ranking of Southend pupils who have applied to their schools.
- 4.1.16 SEN pupils will be accommodated if the named school is identified in the finalised EHCP by 15<sup>th</sup> February for Secondary and 27<sup>th</sup> March for Primary (or next working day) of any given year.
- 4.1.17 SEN and LAC pupils may need to be admitted over number on initial allocation (for offer day) and the School Admissions Team will manage the school back to the PAN until the last week of August at which time the Academy takes over.
- 4.1.16 SBC will match the parental preferences against the rank order lists provided by Southend schools.
- 4.1.17 The scheme operates according to the order in which parents select preferences. The order of preferences should reflect the order parents wish to be offered a place, but if for example parents are unsuccessful in gaining a place for the first preference school they are not disadvantaged in obtaining their second preference or their third preference etc. Schools do not receive details of the preference and have to put pupils in order of their admission criteria without knowing the preference. The process will continue until all preferences are exhausted.
- 4.1.18 SBC will provide any other local authority with details of any pupils resident in their area who can be offered places at schools in the Borough (and vice versa).
- 4.1.19 Where possible SBC will share allocation lists to schools and the CSSE as appropriate, before offer day. This will be dependent on the process being complete

before offer day. Schools will be notified if it is not possible to send the lists to them. When lists can be sent schools will be reminded of section 2.10 of The School Admissions Code 2014, in that school must not contact parents about the outcome of the applications until after these offers have been received. Schools must be mindful that parents that made a paper application may not receive the offer of a place for one or two days after the offer date.

- 4.1.20 SBC will send an offer of a single place to pupils applying for a school places on the offer day.
- 4.1.21 Parents who completed an online application will be advised of the outcome of their application by email on offer day. Unless they indicate on the CAF that they would prefer a response by letter.
- 4.1.22 Parents who completed a paper CAF will be advised of the outcome of their application by 1<sup>st</sup> class post on offer day. Parents should expect to receive the letter within 1 to 2 days of the offer day.
- 4.1.23 Offers are automatically recorded as 'accepted' and parents will be given 10 school days to notify the LA if they wish to reject an offer of a school place. Parents who applied online will be able to do this by using the online facility.
- 4.1.24 For any pupil who has not been allocated a place at one of their expressed preferences SBC will offer them a place at the school in the Borough nearest to the home address with vacancies at that time. Such offers will not be made to selective or faith schools.
- 4.1.25 Any places (that are in demand) will be reallocated if parents advise SBC that they no longer require a place.

## **4.2 Summer Born Children**

- 4.2.1 In the case of children born prematurely or the late summer months\* parents may request admission outside the normal age group.

\*Summer born age: DfE 'Advice on the admission of summer born children' July 2013: 'Children born from the beginning of April to the end of August reach compulsory school age on 31 August. It is likely that most requests for children to be admitted out of their normal year group will come from parents of children born in the later summer months or those born prematurely'.

- 4.2.2 There is no statutory barrier to children being admitted outside their normal year group. Due to the impact on future years for a child's schooling, requests to delay admission are very carefully considered by both the admitting authority and the parents. The decision to admit outside of a child's normal age group is made on the basis of the circumstances of each case.

Parents may submit requests to the LA for any community schools and directly to own admission authorities for Academy schools.

Any decision will seek an outcome in the best interest for the child and for community schools will be considered by a Panel of relevant persons. Parents applying for



schools outside the Borough of Southend will need to consult the respective LA's policy in this regard.

The following items apply to the LA, for community schools only:-

- 4.2.3 Parents submitting a request for admission outside the normal age group must also complete the Common Application Form during the main admission round, 14<sup>th</sup> September – 15<sup>th</sup> January. Parents will need to provide the detailed reasons for their request including any supporting evidence from relevant professionals to enable their request to be given proper consideration.
- 4.2.4 The panel will only consider 'admission outside the normal age group', that is, whether or not a child can start school the year after they turn 5 years of age in the Reception year and not in year 1. The panel will not consider requests for deferment within the reception year as requests can be made by parents directly to the Headteacher of the allocated school (School Admissions Code 2014 section 2.16).
- 4.2.5 The panel will normally consider applications from parents of children born prematurely or in the last summer months for admission outside the normal age group.

**The following items apply for all applications, LA or OAA decision:-**

- 4.2.6 If the parents case for delayed admission into reception is upheld by the panel, or the Own Admission Authority a new application for a place in the next cohort **must** be made in the following round (between September and mid-January) and would be considered along with all the other applicants for admission in that year. There would be no guarantee that a place would be offered in the preferred school.
- 4.2.7 If the parents request for delayed admission into reception is refused, the submitted application would follow due process in the round for the child's normal age group. After the offer of a place has been made the parent could then still request the allocated school to delay entry, attend part-time within the reception year group or the parent can delay admission to the following year for admission to year 1. The Head Teacher would need to consider each case and make a decision that is in the best interest of the child.
- 4.2.8 The full policy on applications to admit outside the normal age group for summer born children will be available on the website\*<sup>1</sup>.  
[http://www.southend.gov.uk/info/200176/school\\_admissions\\_and\\_home\\_education/46/primary\\_school\\_admissions](http://www.southend.gov.uk/info/200176/school_admissions_and_home_education/46/primary_school_admissions)

### **4.3 Co-ordinated arrangements between the offer date and start of autumn term.**

- 4.3.1 From the offer day until the last week of August SBC will continue to co-ordinate admission arrangements and make all offers on behalf of primary and secondary schools in Southend.
- 4.3.2. Where parents have refused the offer of the place then the vacant place will be offered in strict order of the waiting list until the place is accepted.

- 4.3.3 The offer of school places as they become available will continue to be made by SBC.
- 4.3.4 Once the final list is sent to schools on 22<sup>nd</sup> August the coordination procedures for reception year, year 3 and year 7 will cease. SBC will continue to administer waiting lists and in-year admissions for all Community and identified Own Admission Authority schools as agreed. Own Admission Authorities wishing to manage their own waiting lists will do so from 22<sup>nd</sup> August onwards.

#### **4.4 Year 7 - Under and over age applicants**

- 4.4.1 For admissions into year 7, an applicant is under age if he or she will be under 11 years of age on 31<sup>st</sup> August immediately prior to admission in September. SBC will only accept applications from under age applicants who have been registered in year 6 of their primary schools from the first day of the school year in which they apply for a secondary school place. This effectively requires that the decision to promote the child to the year group above his/her chronological age group must be taken by the primary school prior to the end of the summer term in the calendar year in which the child applies for a secondary school place. Confirmation of this is likely to be sought from the headteacher of the primary school concerned by SBC.
- 4.4.2 An applicant is over age if he or she is 12 years of age or over on 31<sup>st</sup> August immediately prior to admission in September. SBC will not accept over age applicants for year 7 admissions unless there are verified exceptional circumstances for a child to repeat one of the primary school years, for example, extended illness. SBC will seek verification from the headteacher of the primary school concerned that an over-aged applicant has medically certifiable reasons or some other exceptional reason for being an over-aged applicant. SBC will wish to investigate especially thoroughly the circumstances through which any child is found to be studying in Year 6 for the second time, especially if this should involve an application to sit the CSSE selection tests for a second time. Medical evidence will be required for such applicants.

#### **4.5 Overseas applicants – applications from children whose parents are living abroad and do not have a “home authority”**

- 4.5.1 Parents who are living abroad and who wish their child to apply for a Southend school have no “home authority” (through which the regulations stipulate that all applications should be made). They can nonetheless apply through what is a proxy home authority (i.e. the Council area in which they intend to buy a house or settle the child with relatives). However, although they may apply in this way, no place will be offered until they can provide clear evidence of residency in this Borough and this may include the relevant immigration documents. In addition, proof of the home address/normal place of residence through either a house purchase, through exchange of contracts, or a long term letting agreement. The School Admissions Team would have to be satisfied that the child’s normal place of residence would be at the address provided.
- 4.5.2 The CSSE will arrange for overseas applicants for year 7 to sit the selection tests overseas under invigilated conditions at an agreed test centre.

## **4.6 New applications, late applications, changes of preferences and additional applications – for coordination of reception, year 3 and year 7**

### 4.6.1 New applications:

Parents moving into the area, who in the view of SBC could not have made an application by the appropriate closing date, will have their application slotted into the system as and when received. The last date where it would be possible for this to happen is 19th January for secondary applications and 2<sup>nd</sup> March for primary applications. These will be regarded as new applications. This will also apply to parents who move within the Borough where the change of address would alter their ranking at a school. Any such application received after these dates will not be considered until after the initial allocation of places on offer day.

### 4.6.2 Change of address/New applications for selective places

*Due to the high variations of address policies across the various LAs and own admission authorities, regardless of home LA, addresses for selective and partially selective places for schools in Southend-on-Sea are as per the child's normal place of residence (address) as at the closing date for Secondary Admissions (31<sup>st</sup> October). Any addresses after the closing date are updated after offer day (1<sup>st</sup> March) and the applications ranked accordingly.*

### 4.6.2 Late applications

Applications received after the closing date from those who could have made an application on time, will be regarded as late and will therefore not be considered until all "on time" applications have been considered and the initial allocation of places are notified to parents. SBC will be the final arbiter, under the coordinated scheme, as to whether an application is late or not. Schools should apply their admission criteria to such late pupils but identification as "Late" by SBC will prevent schools from putting a ranking against these pupils when the full list is sent back to SBC.

### 4.6.3 Changes in preference

Changes in the order of preferences already expressed will not be accepted after the closing dates unless, the circumstances are deemed to be exceptional and the changes can be accommodated. Changes received after the closing date will be considered after the appropriate national offer date.

### 4.6.4 Additional preferences

Any additional preferences received after the closing dates will be considered after the offer date.

### 4.6.5 Southend-on-Sea Borough Council takes very seriously any attempt to gain unfair advantage in the admissions process by giving false information (for example providing a false address). Checks will be made with other departments in the Council and, where it is suspected that the family actually live outside Southend, contact will be made with the relevant Council. Where there is reasonable doubt as to the validity of a home address, the Council reserves the right to take additional

checking measures including, in some cases, unannounced home visits. If, after offers of school places have been made, it is established that fraudulent or intentionally misleading information has been provided in order to gain a place at a primary or secondary school, the Council will withdraw any school place offered. If an offer of a school place is withdrawn under these circumstances the application would be considered afresh, (with proof of address or other relevant information) unless a new application form is deemed necessary and the parent advised of their right of appeal to an Independent Appeal Panel (2.12 of the Code) .

- 4.6.6 Changes of address between offer day and the last week of August will be checked by SBC. Parents will need to provide proof of the home address in the form of; a house purchase; exchange of contracts, or a long term letting agreement.
- 4.6.7 Places can be withdrawn up to the end of December in the situation where an offer is made in error or the application has been found to be fraudulent. Own Admission authorities must inform the LA of any places withdrawn for the coordinated round up to December of each year and vice versa.
- 4.6.7 Schools must inform the LA of address, sibling or any other discrepancies in ranking lists or in information provided by parents on the enrolment forms post offer day.

#### 4.7 Supplementary Information Forms

- 4.7.1 In order that they may seek further information to apply their admission criteria, the following schools require parents to complete a Supplementary Information Form (SIF) in addition to the appropriate application form.

School	Details
<b>Primary:</b>	
Our Lady of Lourdes Catholic Primary	For all applications
Sacred Heart Catholic Primary	For all applications
St George's Catholic Primary	For all applications
St Helen's Catholic Primary	For all applications
St Mary's, Prittlewell, C of E Primary	For all applications
<b>Secondary:</b>	
Cecil Jones Academy	For year 7 applications for selective places
St Bernard's High School	For all applications
St Thomas More High School	For all applications
Shoeburyness High School	For year 7 applications for selective places
Southend High School for Boys	For all applications for selective places
Southend High School for Girls	For all applications for selective places
The Eastwood School	For year 7 applications for Sport / Performing Arts places
Westcliff High School for Boys	For all applications for selective places
Westcliff High School for Girls	For all applications for selective places

- 4.7.2 The SIFs for year 7 applications for selective places must be returned to the Consortium of Selective Schools in Essex (CSSE), for all rounds of admissions SIFs must be returned direct to the school.

- 4.7.3 Parents are encouraged to send in the CAF and any SIF as early as possible prior to the closing date. The SIF for selective and aptitude testing will be before the CAF closing date (also refer to sections 4.1.5 and 4.1.6).
- 4.7.4 All SIFs must clearly indicate that they are not application forms and that the appropriate application form must be completed. SIFs cannot request:
- any personal details about parents and families, such as maiden names, criminal convictions, marital, or financial status (including marriage certificates);
  - the first language of parents or the child;
  - details about a parent's, parent's or a child's disabilities, special educational needs or medical conditions;
  - parents to agree to support the ethos of the school in a practical way;
  - both parents to sign the form, or for the child to complete the form (School Admission Code 2014 section 2.4 ).
- 4.7.5 Schools must consult the School Admissions Code 2014 sections 1.9 and 2.4 when developing their supplementary information forms.
- 4.7.6 Schools must be mindful of siblings from multiple births in oversubscription criteria and where possible admit them (e.g. selective, specialist and faith criteria exempt).
- 4.7.7 Applicants must 'submit' online forms. Unsubmitted forms will not be processed. Applicants must have evidence of submitted forms therefore if application forms were posted they must have proof of postage and if applied online they must produce the automatic online receipt.

## **4.8 Waiting lists**

- 4.8.1 For the reception, year 3 and year 7 rounds of admissions, on offer day SBC will have a waiting list for each Southend oversubscribed school which will exclude any late applicant and late changes in preference. In most cases SBC will be able to rank the pupil from existing information, for example distance. Depending on the admission criteria a new application would then be slotted into the waiting list as appropriate.
- 4.8.2 SBC will maintain the waiting list as ranked by schools. Where any new pupil, such as a late application, is added to the waiting list SBC should be advised within 10 working days of where such pupils fit in relation to other pupils on the waiting list.
- 4.8.3 Where a vacancy does arise the place will be offered by SBC to the pupil on top of the waiting list.
- 4.8.4 A parent of a child at the top of the waiting list offered a place as a result of a vacancy having arisen will be expected to confirm, within 10 working days, whether or not they wish to accept the place.

- 4.8.5 SBC will maintain waiting lists for all community schools in the Borough for the full school year. Waiting lists for academy, foundation, free school and voluntary aided schools will be maintained by them for at least the autumn term. Waiting lists will be maintained strictly in accordance with the admission criteria of the school concerned.
- 4.8.6 SBC will delete pupils from the waiting list who are offered and accept a place at a higher ranking school.
- 4.8.7 Where, as part of the school admissions process, a parent is required to complete a SIF, SBC should be advised by the school within 10 working days of where such pupils fit in relation to other pupils on the waiting list. New pupils will not be added to the waiting list but will be at the bottom of the school list until this information has been provided by the school and the application can be slotted into the waiting accordingly.
- 4.8.8 All admission authorities must specify, in their arrangements, the period a child remains on a waiting list for each school year. For main round Reception, year 3 and year 7 it must be at least to Dec of the admission year. Community school waiting list are held for the full school year that the application was made. Waiting lists, for all year groups close on the last day of the school year. Parent must reapply for the new school year from the start of the Summer Term if they wish to be added to the waiting list for the next school year.

#### **4.9 Appeals**

- 4.9.1 Parents have the right of appeal against a decision to refuse admission to a school which they had put as a preference.
- 4.9.2 Parents will be given 20 school days to appeal against the decision to refuse their application for a place at a particular school.
- 4.9.3 Parents wishing to appeal for a place at any school in the Borough will be advised by SBC to read the on-line appeals information and complete the online appeal form which will be submitted to SBC. Paper copies of the appeals information and form will also be available if required. If the appeal relates to an academy, foundation, free school or voluntary aided school the form will immediately be sent to the school concerned for them to arrange the appeal. Appeals for places at community schools will be organised by SBC.
- 4.9.4 SBC will advise parents wishing to submit an appeal in respect of a school outside the Borough to contact the Local Authority where the school is located to enquire about the appeal arrangements.
- 4.9.5 Schools will send lists of submitted appeals to SBC. SBC will record the appeal against the admission record and provide the school with all relevant documentation to enable the School to prepare for the appeal.
- 4.9.6 In accordance with the School Admission Appeals Code, Independent Appeal Panels for community, academy, foundation, free school and voluntary aided schools must consist of:

a) at least one lay member. Lay members are people without personal experience in the management or provision of education in any school (though it is permissible to use people who have experience as governors of other schools, or who have been involved in education in any other voluntary capacity) and

b) at least one person with experience in education, who is acquainted with educational conditions in the area, or who is a parent of a registered pupil at a school.

4.9.7 Academy, foundation, free school and voluntary aided schools must inform SBC within 5 school days of the outcome of any appeal. The outcome of any appeal does not mean that the parent will necessarily take up a place as they may have other appeals or may prefer the original place offered.

4.9.8 Having received notification from the school, SBC will contact parents and ask them to confirm in writing to SBC which place they wish to accept following the outcome of any appeals. They will be asked to confirm this within 5 school days of their last appeal. Once a place is released that place will be reallocated.

## **5. Annual Review of the Scheme**

5.1 Each year all local authorities must formulate and publish on their website a scheme by 1 January in the relevant determination year to co-ordinate admission arrangements for all publicly funded schools within their area.

5.2 The School Admissions Code confirms that if the Local Authority decides to continue to use the scheme from the previous year, this will fulfill the legal requirement to formulate a scheme. Local Authorities must consult admission authorities for schools affected by the scheme and other Local Authorities every 7 years as a minimum. If the scheme has changed substantially since the previous year, the Local Authority must consult school governing bodies and other admission authorities in the area even if that is less than 7 years since the last consultation.

5.3 A local authority must inform the Secretary of State whether they have secured the adoption of a qualifying scheme by 15 April. If this is not achieved the Secretary of State may impose a scheme.

## **6. Council and school duties under the scheme**

6.1 These are set out in the School Admissions (Admission Arrangements and Co-ordination of Admission Arrangements) (England) Regulations 2014 and schools should refer to these if they have any queries.

6.2 In summary the main duties are:

### **Southend Borough Council**

- To forward details submitted on the Common Application Form, together with any supporting information provided by the parent to the school or to any other local authority as appropriate;
- To sort the lists received from schools, or other local authorities, and according to the preference expressed by the parent determine which school place should be offered;

- To forward onto schools information received from other local authorities pupils who have applied to Southend schools;
- To notify schools and other local authorities of the offers to be made;
- To make an offer to parents on national offer day on behalf of schools, including for schools in other local authorities.

#### Governing Body

- To notify Southend Borough Council of any application made direct to the school;
- To determine all applications in line with the school's admission criteria and to notify the Council of this.

## 7. List of schools to which the scheme applies

- 7.1 Southend Borough Council is the admission authority for community schools. The governing body is the admission authority for academy, foundation, free school or voluntary aided schools.

SECONDARY		
School Name	DfE	Status**
Belfairs Academy	5434	Academy
Cecil Jones Academy	4001	Academy
Chase High School	4000	Academy
Futures Community College	4736	Foundation (proposed to convert)
St Bernard's High School	5465	Academy
St Thomas More High School	5447	Academy
Shoeburyness High School	4034	Academy
Southend High School for Boys	5446	Academy
Southend High School for Girls	5428	Academy
The Eastwood Academy	5414	Academy
Westcliff High School for Boys	5401	Academy
Westcliff High School for Girls	5423	Academy
* DfE codes and status for schools may be subject to change if status of school changes (e.g. Community to Academy).		



PRIMARY		
School Name	DfE Number*	Status**
Barons Court Primary School & Nursery	2124	Community
Blenheim Primary School	2387	Academy
Bournemouth Park Academy	3822	Academy
Bournes Green Infant School	2128	Academy
Bournes Green Junior School (partner school)	2123	Community (proposed to convert)
Chalkwell Hall Infant School	2022	Community
Chalkwell Hall Junior School (partner school)	2019	Community
Darlinghurst School	2127	Academy
Earls Hall Primary School	2023	Community
Eastwood Primary School	3825	Foundation
Edwards Hall Primary School	3826	Community
Fairways Primary School	2407	Community
Friars Primary School & Nursery	3824	Academy
Hamstel Infant School	2093	Academy
Hamstel Junior School (partner school)	2092	Academy
Heycroft Primary School	2126	Community
Hinguar Community Primary School	2094	Academy
Leigh North Street Primary School	2096	Community
Milton Hall Primary School	5273	Foundation
Our Lady Of Lourdes Catholic Primary School	3328	Voluntary Aided
Porters Grange Primary School & Nursery	2001	Academy
Prince Avenue Academy	2000	Academy
Richmond Avenue Primary School	3823	Community (proposed to convert)
Sacred Heart Catholic Primary School & Nursery	3326	Voluntary Aided
St George's Catholic Primary School	3329	Voluntary Aided
St Helen's Catholic Primary School	3327	Voluntary Aided
St Mary's Prittlewell Church of England Primary School	3325	Voluntary Aided
Temple Sutton Primary School	2132	Community (proposed to convert)
The Westborough Primary School & Nursery	5206	Academy
Federation of Greenways Schools -Thorpe Greenways Infant School	2105	Academy
Federation of Greenways Schools -Thorpe Greenways Junior School	2104	Academy
Thorpedene Primary School	5225	Academy
West Leigh Infant School	2109	Community
West Leigh Junior School (partner school)	2108	Academy

\*DfE codes and status for schools may be subject to change if status of school changes (e.g. Community to Academy).

## 8. Definitions

**Academies** – Schools funded directly by Central Government where the academy trust employs the staff and is the admission authority.

**Additional applications** - An application from a parent who has already submitted an application and is requesting an additional school(s). This will normally be after the initial offer of places in March.

**Admissions Forum** – A body comprising of representatives from various groups which advises admissions authorities on admission arrangements in the area

**Catchment area** – A defined geographical area served by a particular school

**Changes in preference** - Changes in the order of preferences already expressed (that is not an additional application).

**Community schools** – Schools wholly funded by SBC, where the Council employs the staff and is the admissions authority.

**CSSE** – The Consortium of Selective Schools in Essex – a group of schools that are responsible for the selection test (11+) arrangements. The 10 schools below operate a consortium whereby only one test needs to be taken even though an application is being made to several schools. The schools are:

Shoeburyness High School

Southend High School for Boys

Southend High School for Girls

St Bernard's High School

St Thomas More High School

Westcliff High School for Boys

Westcliff High School for Girls

King Edward VI Chelmsford (Boys) – school in Essex

Colchester County High School (Girls) – school in Essex

Royal Grammar School, Colchester (Boys) – school in Essex

**DFE - Department for Education** – Central government department responsible for education matters.

**Foundation schools** – Schools funded by the Council, where the Governing body employs the staff and is the admissions authority.

**Free School** - are state-funded schools normally set up in response to parental demand. They have the same legal requirements as academy schools.

**Late applications** - Applications received after the closing date from those who could have made an application on time.

**National Offer Day** – the day on which all offers of places are made. For year 7 this is on or about 1<sup>st</sup> March and reception year and year 3 this will be on or about 16<sup>th</sup> April. In each case if the day falls on a weekend or bank holiday it will be next working day. The offer day will therefore be 1<sup>st</sup> March 2019 for secondary applications and 16<sup>th</sup> April 2019 for primary applications.

**New applications** - Parents who in the view of SBC could not have made an application by the appropriate closing date, for example, when moving into the area, will have their application slotted into the system as and when received. Due to the allocation of places this can only be achieved up to 19<sup>th</sup> January for secondary applications and 2<sup>nd</sup> March for primary applications. Any application after that date will be slotted in after offer day.

**Non-selective places** – school places offered without reference to the selective (11+) procedure.

**Normal round of admissions** – Under the Southend Coordinated Admissions Scheme, the normal round of admissions refers to admissions to reception, year 3 and year 7 up to 22<sup>nd</sup> August..

**Potential year 7 admissions** – All pupils in year 6 in primary schools (whether or not that is their age appropriate cohort) who will transfer to secondary schools in the following September.

**Common Application Form (CAF)** – the common application form on which parents indicate their preferences

**Selective places** –places offered at certain schools as a result of the pupils' performance in the selection (11+) procedure.

**SIFs** – Supplementary Information Forms – forms on which parents are asked to provide additional information in support of their applications in order to provide more information to enable the school to apply their admission criteria. These are not application forms.

**Southend Borough Council (SBC)** – In most cases the function of the Council will be undertaken by the School Admissions Team within the Department of People.

**Specialist places** – School places offered to a small number of pupils at certain schools as a result of an aptitude in certain areas of the curriculum

**Voluntary Aided schools** – Schools set up and owned by a voluntary body, usually a church body, largely financed by the Council. The governing body employs the staff and is the admission authority.

## 9. Key dates – Primary admissions September 2019

1st January 2017	Date for formulation of scheme
1st September to 11th September 2018	Publish Admissions Information Advertisements, fliers and letters to registered parents of early years children
14th September 2018	Opening of on-line admissions facility
Early October 2018	Distribution of year 3 “letter/fliers” to year 2 pupils
Mid December 2018	Preliminary lists to faith schools for SIF follow up
15th January 2019	Closing date for admission applications
22nd January 2019	Follow up list to faith schools for SIF follow up
31st January 2019	Final list of preferences to be sent to schools and other authorities
26th February 2019	Closing date for schools to return ranked preferences
2nd March 2019	Closing date for New Applications (see para. 4.5.1)
16th April 2019	National Offer Day (16th April or next working day)
30th April 2019	Closing date for responses to offers (refusals)
15th May 2019	Closing date for appeal forms
17th July 2019	All on-time appeals completed
22nd August 2019	The administration of waiting lists for years R and 3 and all in-year admissions handed over to academy, voluntary aided, and foundation schools.

## 10. Key dates – Secondary admissions September 2019

1st January 2018	Date for formulation of scheme
1 <sup>st</sup> week in July 2018	Publication of Secondary Admissions Information (booklet) Admissions information distribution to year 5 pupils. Open evenings at schools that admit pupils as a result of testing / auditions
1st July – 7 <sup>th</sup> September 2018	Registration for testing / audition
1st September 2018	Opening of on-line admissions facility for transfer to secondary school
Week beginning 1 <sup>st</sup> September 2018	Distribution of reminder flier to year 6 pupils
XX September 2018*	11+ test (to be confirmed by the CSSE – dates will be available in the Admissions booklets)
XX September 2018*	Alternative test date (for religious, illness or exceptional circumstances) 11+ test (to be confirmed by the CSSE – dates will be available in the Admissions booklets)
mid October 2018*	Testing results to be sent to parents by CSSE / schools
23rd October 2018	Preliminary list to be sent to faith schools and Eastwood for SIF follow up
31 <sup>st</sup> October 2018	Closing date for admission applications
7 <sup>th</sup> November 2018	Follow up list to be sent to faith schools and Eastwood for SIF follow up.
30 <sup>th</sup> November 2018	Final list of preferences to be sent to schools and other authorities.
7 <sup>th</sup> January 2019	Closing date for schools to return ranked preferences
19 <sup>th</sup> January 2019	Closing date for New Applications (see paragraph 4.6.1)
1 <sup>st</sup> March 2019	National Offer day
15 <sup>th</sup> March 2019	Closing date for responses to offers (refusals)
May 2019	All on-time appeals completed - refer to School Admissions Appeals Code 2012.
22 <sup>nd</sup> August 2019	The administration of waiting lists for years R and 3 and all in-year admissions handed over to academy, voluntary aided, and foundation, free schools.

\*Dates to be confirmed by the CSSE – final dates will be available in the Admissions booklets



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## Community School Published Admission Numbers for September 2019 round of admissions

Community Primary Schools	Proposed admission limit for 2019/20
Barons Court Primary School & Nursery	35
Chalkwell Hall Infant School	120
Chalkwell Hall Junior School	120
Earls Hall Primary School	90
Edwards Hall Primary School	60
Fairways Primary School	60
Heycroft Primary School	60
Leigh North Street Primary School	90
Temple Sutton Primary School	120
West Leigh Infant School	120

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# Southend-on-Sea Borough Council

Agenda  
Item No.

Report of Deputy Chief Executive (People)

to  
Cabinet  
on

19th September 2017

Report prepared by:  
Andrea Atherton, Director of Public Health

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## Suicide Prevention Strategy for Southend, Essex and Thurrock “Let’s Talk About Suicide”

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### 1. Purpose of Report

1.1. To present the draft Suicide Prevention Strategy for Southend, Essex and Thurrock  
“Let’s Talk About Suicide”

### 2. Recommendation

2.1. That the draft suicide prevention strategy and associated actions are agreed.

### 3. Background

3.1. The impact of any death is profound, affecting loved ones, friends, work colleagues and entire communities. The impact of a death from suicide can be more complex due to often unexpected nature of the death as well as the delays in investigation and conclusion.

3.2. Mental health is a key factor in suicide, yet the majority of those who take their own life were not in contact with mental health services. In the main, the causes are the everyday pressures of health, relationships, and finances that we may all struggle with. As such, there is no one solution to preventing suicide. By having a thriving and prosperous local economy, safe communities, a focus on health and wellbeing, and a strong start in life, we can reduce some of those risks.

3.3. In 2012, the government of the day published a report entitled Preventing Suicide in England, which set a welcome blueprint for local authorities and others. This has since been supplemented with further guidance from Public Health England. The All-Party Parliamentary Group (APPG) on Suicide and Self-Harm Prevention Inquiry into Local Suicide Prevention Plans in England 2015 recommended that all local authorities have in place suicide audit work, a suicide prevention plan and a multi-agency group to implement the plan. This is now seen as a political imperative, with all areas recommended to have multi-agency suicide prevention plans in place by the end of 2017.

## **4. Let's Talk About Suicide – The Strategy**

4.1. Preventing Suicide in England identified six key areas for action to deliver the objectives:

- Reduce the risk of suicide in key high-risk groups
- Tailor approaches to improve mental health in specific groups
- Reduce access to the means of suicide
- Provide better information to those bereaved or affected by suicide
- Support the media in delivering sensitive approaches to suicide and suicidal behaviour
- Support research, data collection and monitoring

4.2. Our actions are set out to mirror those of the national strategy. The action plan set out by the strategy reflects the on-going and intended work of a multitude of organisations and partnerships articulated in a range of documents. These include SET Mental Health and Wellbeing Strategy, Crisis Care Concordats, Safeguarding plans and SET Local Transformation Plan for children and young people's mental health.

4.3. The intention of this suicide prevention strategy, in this first year, is to collate and cross reference the strategic intent and action plans of various local groups and organisations that have a role to play in suicide prevention.

4.4. In addition to the actions already intended by the relevant organisations and partnerships the strategy makes some additional recommendations that will be taken forward by task and finish groups and report into the Suicide Prevention Implementation Programme Working Group for the Mental Health and Wellbeing Strategy.

4.5. Its approach is to recommend that the actions are owned by the responsible organisations and partnerships, with annual oversight by the Health and Wellbeing boards and an annual summit focused solely on suicide prevention.

4.6. The suicide prevention strategy was considered at the July meeting of Southend Health and Wellbeing Board, when it was agreed that a specific local task and finish group would be established to monitor the delivery of appropriate actions in Southend.

## **5. Reason for recommendation**

5.1. This approach recognises the complex geography of Southend, Essex and Thurrock with overlapping boundaries and jurisdictions which require both local and shared approach to suicide prevention. It still allows for local flexibility whilst maintaining a broader overview for those partners who cross local boundaries.

5.2. The three upper-tier local authorities in greater Essex have agreed to work in partnership as a pragmatic measure to working more effectively, reducing duplication and creating better outcomes for our populations. Southend, Essex and Thurrock (SET) have used a common tool for the suicide audits conducted, and have jointly analysed our results in order to gain a richer understanding of

the causal factors, means and circumstances of deaths; and also to identify any 'hotspots' in our wider geography.

- 5.3. The Southend, Essex and Thurrock Mental Health and Wellbeing Strategy 2017-21 identifies suicide prevention as a priority. There is a Strategy Implementation Work stream for this priority that will oversee the delivery of the Suicide strategy, thus linking the objectives and delivery of the two strategies together (see Appendix 1).
- 5.4. The strategic approach to suicide prevention follows the six areas for action in the national "Preventing Suicide in England" (HM Government, 2012) strategy.
- 5.5. The Mid and South Essex Sustainability and Transformation Plan identified reducing suicide and self-harm as one of three key priorities for mental health. This has also provided a better link to clinical leadership for the partnership.

## **6. Corporate Implications**

### **6.1. Contribution to Council's Vision & Corporate Priorities**

Let's Talk About Suicide's aims of reducing suicide rates will support positive outcomes for the council's key aims of Safe, Healthy, and Prosperous – helping to deliver the vision of 'Creating a better Southend'

### **6.2. Value for Money**

The cost of a suicide has been calculated as £1.67million, with 70% of that figure representing the emotional impact on relatives (National Suicide Prevention Alliance) With around 175 deaths through suicide each year across Southend, Essex and Thurrock (a cost of £292.2 million) prevention of even one suicide offers value for money.

### **6.3. Legal Implications**

None

### **6.4. People Implications**

There would be no negative people implications

### **6.5. Property Implications**

There would be no property implications – no suicide 'hotspots' were identified within the town.

### **6.6. Consultation**

As the strategy reflects the ongoing and intended work of a multitude of organisations and partnerships, we have not consulted specifically with the public on this strategy. The SET Mental Health and Wellbeing Strategy was shaped and informed by an independent review of Essex's mental health services and by the views and experiences of hundreds of people with lived experience of mental

health problems, their carers and families, as well as by clinicians and commissioners.

In addition to this a stakeholder event was held on 8<sup>th</sup> March 2017 in order to test acceptability and completeness. This particularly addressed:

- Were there any actions are we missing
- What should be done at Southend, Essex & Thurrock footprint and what is for local action?
- What will success would look like in 12 months and 5 years?

#### 6.7. Equalities and Diversity

The strategy was informed in its development by an audit of all suicides in Southend, with data collected on a suite of characteristics, in order to identify any specific actions for common factors or groups with specific characteristics.

#### 6.8. Community Safety Implications

Working on an SET basis for suicide prevention allows for the development of a systematic approach to audit data collection and the further investigation through a task and finish group of methods for real time surveillance and data sharing with Essex Police and Network Rail in particular.

#### 6.9. Risk Assessment

This is a national imperative where real progress has been made in reducing the already relatively low suicide rate to record low levels. In Southend we are statistically similar to the national rate, however, we have continued economic pressures on the general population, coupled with the increasing local prevalence of depression and anxiety it is important to take actions to prevent an increase in the rate.

#### 6.10. Environmental Impact

None

### 7. Appendices

#### 7.1. SET Draft Suicide Prevention Strategy

#### 7.2 SET Mental Health and Wellbeing Strategy Implementation Workstream Brief



SET\_Strategy\_Implementation\_workstrea

# LETS TALK ABOUT SUICIDE

Preventing suicides in Southend, Essex and Thurrock 2017



## Version Control Sheet

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<b>Title</b>	Suicide Prevention Strategy
<b>Owner</b>	Southend, Essex and Thurrock Public Health Teams
<b>Date</b>	June 2017
<b>Version number</b>	1
<b>status</b>	Draft
<b>Next review date</b>	June 2018

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## Foreword

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The impact of any death is profound, affecting loved ones, friends, work colleagues and entire communities. The impact of a death from suicide can be more complex due to often unexpected nature of the death as well as the delays in investigation and conclusion.

The causes of suicide are many. Mental health is a key factor yet the majority of those who take their own life were not in contact with mental health services. In the main, the causes are the everyday pressures of health, relationships, and finances that we may all struggle with. As such, there is no one solution to preventing suicide. Everything we do – as councils and health services, in partnership with many others such as schools and employers – can promote the wellbeing of the population and reduce the risks of suicide. By having a thriving and prosperous local economy, safe communities, a focus on health and wellbeing, and a strong start in life, we can reduce some of those risks.

In 2012, the government of the day published a report entitled *Preventing Suicide in England*, which set a welcome blueprint for local authorities and others. This has since been supplemented with further guidance from Public Health England. The Select Committee has produced its views and recommendations, and it is now seen as a political imperative.

No single organisation can do this alone. We will work through existing agencies and partnerships to build upon and strengthen those actions that we know have an impact.

There are around 175 deaths through suicide each year across Southend, Essex and Thurrock.

We are proud to present this strategy as our first step in tackling this agenda. We hear from those affected by suicidal thoughts and from families and carers that a key part of improving care is to reduce stigma. We are building on some ground-breaking work in other parts of the UK and abroad, where conversations are had about depression, anxiety and suicide. The title “*Lets Talk About Suicide*” reflects the importance of having the conversation whether that is with professionals or simply tackling the stigma of mental health and suicide in particular. The title “*Lets Talk About*” is also used for our Mental Health and Dementia strategies for the same reason.

Andrea Atherton

Director of Public Health

Southend

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Director of Public Health

Essex

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Director of Public Health

Thurrock

# Acknowledgements

With thanks to all those who have helped us with the strategy through interviews, signposting, and attending our stakeholder events. We particularly thank Maggie Pacini, Liesel Parks, Funmi Worrell, Gemma Andrews and Marcus Roberts for their hard work in pulling together this strategy.

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# Executive summary

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## Introduction

Suicides are not inevitable. The Southend, Essex and Thurrock partners have agreed to take the ambition of 'Zero Suicide' as the drive for transformational change with optimistic and ambitious expectations. We will build this approach through the branding of **'Let's Talk About Suicide'**.

## National context

In 2012 the Government published its suicide strategy, *Preventing Suicide in England* (DH, 2012). This was in response to rising rates of suicide since 2008. The national rate of suicide is 10.1 per 100,000 persons. We know that men are more likely than women to commit suicide with national rates of 15.8 and 4.7 per 100,000 for males and females respectively. Those known to mental health services are at higher risk, yet more suicides occur in people not under the care of mental health services. The Five Year Forward View for Mental Health (2016) recommends that the Department of Health, Public Health England and NHS England support all areas to have multi-agency suicide prevention plans in place by 2017, and the Secretary of State for Health committed to action to achieve this in his foreword to the Third Progress Report on the national suicide prevention strategy.

## Local context

Concerns about suicide rates in Essex were highlighted in the 2016 Joint Strategic Needs Assessment. Locally, suicide rates are similar to the national figures at 10.4, 11.3 and 11.3 per 100,000 persons for Essex, Southend and Thurrock respectively. The trends for person suicide rate are similar to national, although Essex rates are above regional. However, the Essex suicide rate for females tracked as statistically significantly greater than the national average between 2010 and 2014 and should be closely monitored.

The *Southend, Essex and Thurrock Mental Health and Wellbeing Strategy 2017-2021* identifies suicide prevention as a priority for Greater Essex and is intended to drive a range of improvements in mental health services that would be expected to have a positive impact on suicide rates, including improved access to treatment for depression and anxiety, better crisis care and a focus on recovery support following discharge from specialist mental health services.

The Mid and South Essex Sustainability and Transformation Plan (STP) has identified reducing suicide and self-harm as one of three key priorities for mental health. The West Essex and Hertfordshire STP plan identifies taking forward a multi-agency approach to suicide as a priority for

promoting improved mental health. The Suffolk and North East Essex STP plan indicates a whole system approach to the delivery of specific services such as crisis mental health care and suicide prevention.

The Southend, Essex and Thurrock Local Transformation Plan for children and young people's mental health *Open Up, Reach Out* recognises that 'the risk of suicide and self-harm is one of the major concerns of children and young people, families, carers and school staff'.

The Mid-Essex Suicide Prevention Project is one of a group of four pilots led by the East of England Strategic Clinical Network under the 'zero suicide' approach; learning from these pilots should inform local action. These pilots were positively and independently evaluated by the Centre for Mental Health.

A separate report is available on the audit of suicides in 2014/15. Those who died in Southend, Essex and Thurrock were more likely to be male and young to middle aged. Risk factors included drug and/or alcohol problem, previous suicide attempt and/or episodes of self-harm, mental or physical health problems, relationship stress, financial difficulties, involvement in criminal justice system, and recent bereavement. Two thirds died in their own home; rail and coastline are small but significant locations with scope for intervention. Hanging and poisoning were the most common means of death; opiates being the most common cause of poisoning. About one third of people were known to be in contact with or had previous contact with mental health services.

A separate review of suicide in young people found:-

- More likely to occur in boys than in girls
- Most of the young people were not previously known to mental health services.
- Hanging was the means of death for 10 of the 11 young people (poisoning accounting for the other).
- It was not always clear whether death was the intention, or whether accidental or a fatal self-harm episode.

## **Actions**

The action plan set out by the strategy reflects the ongoing and intended work of a multitude of organisations and partnerships, articulated in a range of documents including the SET Mental Health and Wellbeing Strategy, Crisis Care Concordats, safeguarding plans, and the SET Local Transformation Plan for children and young people's mental health.

***Preventing Suicide in England*** identified six key areas for action to support delivery of the objectives

1. Reduce the risk of suicide in key high-risk groups

The majority of action is addressed in the Southend, Essex and Thurrock Mental Health and Wellbeing Strategy 2017-2021 which outlines ambitions and identifies a wide range of outcomes for mental health, supported by implementation plans.

Of the key high risk groups there is little specific mention of targeted action for young and middle aged men, nor specific occupational groups. Current action addresses the key groups of those known to mental health services, people with a history of self-harm, and people in the criminal justice system.

2. Tailor approaches to improve mental health in specific groups

As well as the specific focus on suicide, a broader approach should be taken, looking more at general mental health well-being across the whole population, and recognising the particular needs of specific, often marginalised, groups.

There is a significant amount of work on children and young people as a specific group in Southend, Essex and Thurrock. There is ongoing work addressing veterans, survivors of abuse, people with long term conditions, undiagnosed depression, and dual diagnosis. There is less evidence of targeted work for those vulnerable to social and economic circumstances, LGBT and BME groups.

3. Reduce access to the means of suicide

Hanging is the main means of death and efforts to address this has, as its focus, inpatient and criminal justice custodial settings both of which have been the subject of recent inspections. But within broader community settings some action can be taken to reduce suicide in frequently used locations and managing clusters. There is some mention locally of what may be done re safe prescribing and other methods of minimising self-poisoning. The audit did not show any particular frequently used locations and locally there is continued engagement with National Rail. There was little mention of other action relating to the built environment as a means of suicide e.g. high rise structures.

4. Provide better information and support to those bereaved or affected by suicide

Those left behind face the often intolerable aftermath of a suicide. There is structured support available for some but not all; for example there is support to pupils in schools or occupational

support for staff such as mental health staff, police and prison staff who have dealt with suicide in their job but for others it is more ad hoc with the voluntary sector as the significant source of support.

5. Support the media in delivering sensitive approaches to suicide and suicidal behaviour

As well as supporting the media to report suicides responsibly, attention must be directed to informal social media, and how suicide is portrayed. Key action is implementation of Editors' code of conduct relating to suicide reporting.

6. Support research, data collection and monitoring

Local, as well as national data and research must be used. Reliable and timely suicide statistics are the cornerstone of any local suicide prevention strategy and ongoing audit is vital.

The key source of information is the proposed mental health strategy for wider Essex. Further work is needed to understand efforts to address the wider social determinants, especially for the majority of people who are not under the care of mental health services.

### **Prevention group**

The geography and organisational structure across wider Essex is complex. Forums are variously organised on local government boundaries and/or pan CCG boundaries. Certain partner agencies, e.g. the police, probation and community rehabilitation, rail etc., cover wider Essex. As such, there is no one forum that encompasses the entirety of the suicide prevention agenda across Greater Essex. Setting up a suicide prevention group – whilst focusing on the specific agenda – would not necessarily have robust governance and would have duplication of membership of existing partnerships.

The approach taken in the strategy is to recommend that the actions are owned by the responsible organisations and partnerships, with regular agenda items on suicide and a nominated champion on each group, with annual oversight by the Health & Wellbeing Boards and an annual summit focused solely on suicide prevention. This approach still allows for local flexibility whilst maintaining a pan Essex overview especially for those partners who cross local boundaries, whether NHS or other.

### **Recommendations**

The full list of recommendations can be found in section 7. In short, further work is needed in key areas 3 (addressing the means of suicide), 4 (support for the bereaved), and 5 (working with the media). Key area 6 (information and monitoring) has recommendations about the content and timing of further audits. Much work is in place or intended for key areas 1 and 2 (higher risk groups) but there is a gap around interventions for men, certain occupational groups, LGBT, BME and generally addressing the wider social determinants.

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# 1. Aims

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*‘We need to encourage professionals and communities to be so much more open about mental health and suicidal thoughts. People worry that if you mention “suicide” you could be putting ideas in their head – in fact, the opposite is true’.*

Director of Development, Mental Health Provider from *Hope for Better Mental Health*

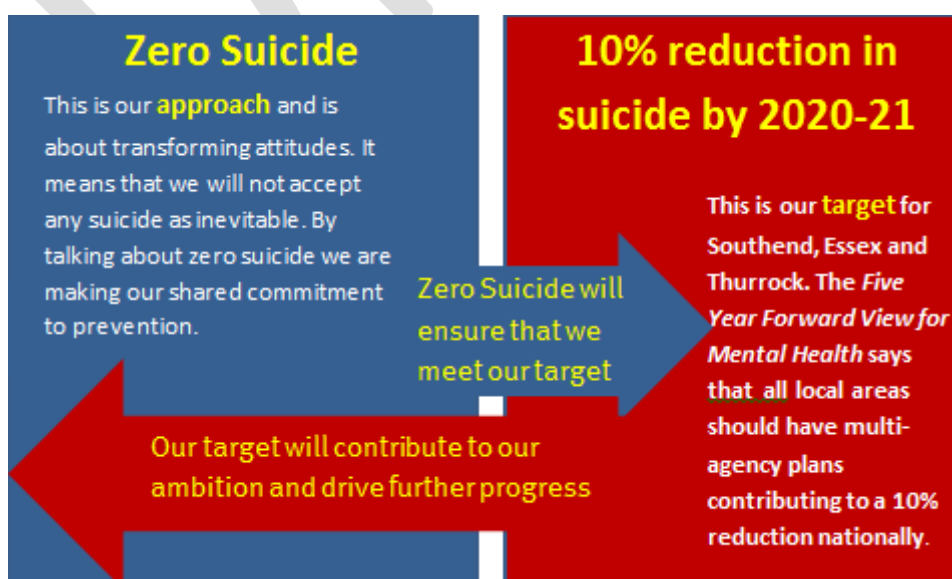
*“For Diane, one of the hardest things to come to terms with was how difficult it is to openly discuss the reasons behind suicide. Being able to meet with others who held similar views and experiences had begun to ease the impact these questions were having on Diane’s well-being. Attending her local carers group and forging a network of bereaved Mums were the two outlets she valued most in her own recovery.”*

From ECC/Public Office, *Hope for Better Mental Health*

This strategy adapts the Zero Suicide approach that was pioneered in Detroit in the USA and has recently been developed in Mid Essex as one of four pathfinder sites in the East of England.

What does this mean? For us, it means that the starting point for this strategy is our belief that it is not inevitable that anyone in Southend, Essex or Thurrock will take their own life. While we may not be able to prevent every suicide, by making Zero Suicide our ambition we will transform the way that we think about suicide, and prevent more people taking their own lives.

It is not helpful therefore to think of Zero Suicide as a short-term performance measure – it is more a philosophy or mind set. Adopting this approach will enable us to meet (and we hope to exceed) the national requirement for a 10% reduction in suicide rates, by aspiring to prevent every suicide. It will also remind us that we should not accept any level of suicide as inevitable or unavoidable.



Suicide prevention is a useful barometer or vital sign of the success of the local economy as it encompasses health, care and the wider determinants of health. It is important that we view this as a whole society issue not just health care as only about a quarter of suicides occur in people under the care of mental health services.

Taking an outcomes-based approach, we propose that reducing suicide rates is a high level indicator demonstrating success across each of the local authority's key objectives:

- ECC's key strategic aims – inclusive economic growth, help people live healthily & independently and create great places to live & work;
- Southend's key objectives - safe, health and prosperous;
- Thurrock's objectives – learning & opportunity, economic prosperity, respect & responsibility, health & wellbeing;

As well as the CCGs stated objectives about improving the health & wellbeing of their populations.

As we 'turn the curve' of suicide rates, we will know that collectively we are delivering to our full potential. It takes a partnership approach to deliver zero suicide whilst also allowing individual organisations to deliver against specific key performance indicators.

We will build this approach through the branding of '**Lets Talk About Suicide**'. This approach recognises the importance of conversations and safety planning between professional and person at risk, but also notes the need to address the stigma of mental health with the general population. Everybody should have an openness, willingness and the confidence to explicitly talk about suicidal thoughts.



## 2. National Context

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### Introduction

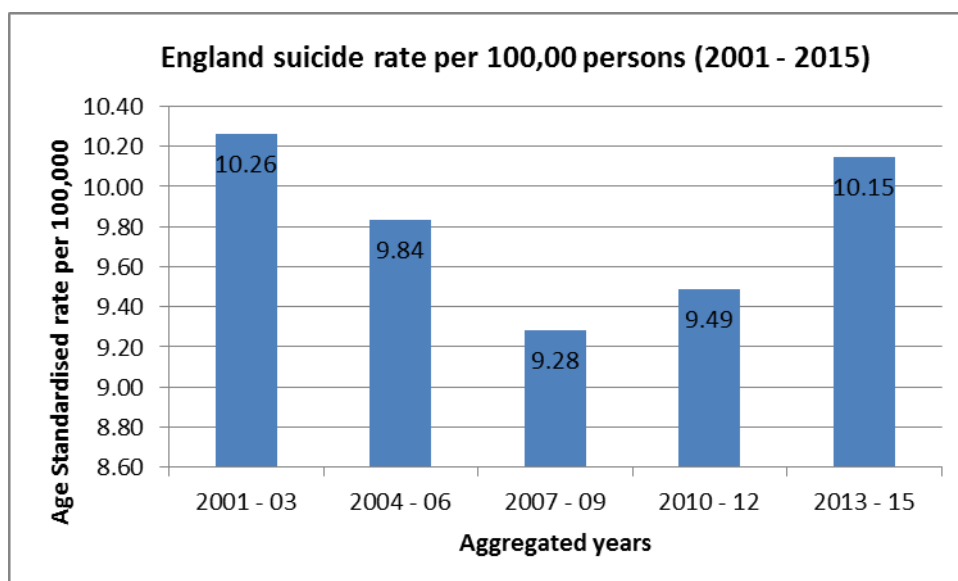
- 1.1. In 2012 the Government published its suicide strategy, *Preventing Suicide in England* (DH, 2012). There have been updates; the most recent being *Preventing Suicide in England: third progress report of the cross government outcomes strategy to save lives* (DH, 2017). Both documents provide useful overviews and information to guide local prevention strategies.
- 1.2. Suicides are not inevitable. An inclusive society that avoids the marginalisation of individuals and which supports people at times of personal crisis will help to prevent suicides. Government and statutory services [and communities] have a role to play (DH, 2012; p9).
- 1.3. In 2013 the All Party Parliamentary Group on Suicide and Self-Harm Prevention published its initial deliberations. This was followed by The All-Party Parliamentary Group (APPG) on Suicide and Self-Harm Prevention Inquiry into Local Suicide Prevention *Plans in England 2015*. The main recommendations from the latter were that all local authorities must have in place:
  - a) Suicide audit work to in order to understand local suicide risk.
  - b) A suicide prevention plan in order to identify the initiatives required to address local suicide risk.
  - c) A multi-agency suicide prevention group to involve all relevant statutory agencies and voluntary organisations in implementing the local plan.
- 1.4. Definitions of suicide vary and caution is needed when comparing data. Appendix 1: **Suicide definitions** includes more detail of the various definitions used.

### Suicide in the general population

#### Time trends

- 1.5. In England, there were 14,429 suicides in 2013-15 compared with 13,233 in 2010-12. The trend in the suicide rate dipped between 2005 and 2012 but has since been rising slightly. The three-year average rate for 2013-15 was 10.1 suicides per 100,000 for the general population (PHE, Suicide Prevention Profiles; accessed 20/3/17).

**Figure 1: Suicides (Death rates from Intentional Self-harm and Injury of Undetermined Intent), England, 3 year averages, 2001 - 2015**

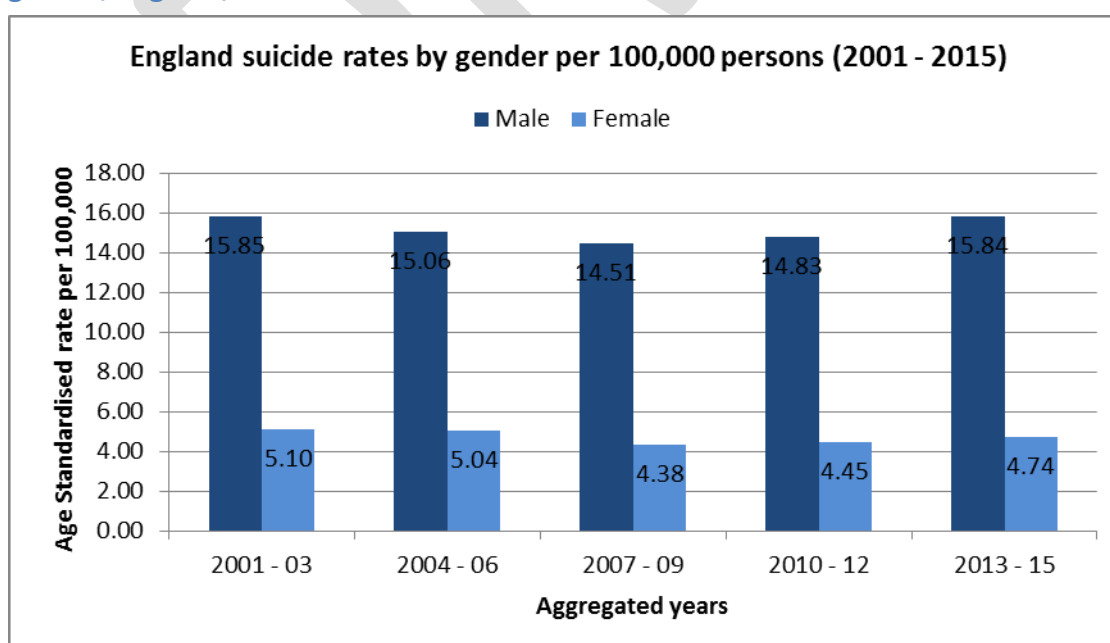


## Gender

1.6. In comparison to women, men are more likely to take their own lives, with adult males typically accounting for about three quarters of all suicides. For 2013-15, the three-year average rate for males was 15.8 per 100,000 population; compared with 4.7 females per 100,000 population.

1.7.

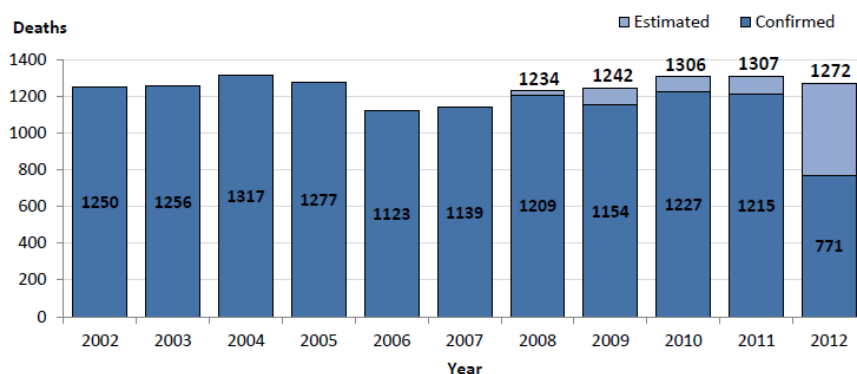
**Figure 2: Suicides (Death rates from Intentional Self-harm and Injury of Undetermined Intent by gender, England, 2015**



## People in contact with mental health services

1.8. The Statistical Update on Suicide records that in 2012 there were 1,272 estimated suicides by people in contact with mental health services in the year prior to death (fig. 3)(DH, 2015; p7). Although for those in receipt of mental health services the actual rates of suicide appear to be falling they are still high. Overall the suicide rate for mental health service users is 87 per 100,000, compared to 8.8 per 100,000 in the general population (National Confidential Inquiry into Suicide and suicide in people with mental illness, 2015, p20). Although people in contact with mental health services are at particularly high risk of committing suicide, most suicides actually occur in people who have not been in contact with mental health services in the previous 12 months.

**Figure 3: Suicides by people in contact with mental health services (in 12 months prior to death), England 2002 - 2012\***



\* The estimated figures provide the most accurate estimate of the number of cases expected. The projected figure may change as data becomes more complete.

Source: National Confidential Inquiry into Suicide and Homicide by people with mental illness

## Methods of suicide

1.9. Hanging (including strangulation and suffocation) is the most common method of suicide for both sexes, (57 per cent for males; 41 per cent for females).<sup>1</sup> The second most common method for both groups is drug poisoning.

## National strategic context

1.10. The Government's *Preventing Suicide in England* strategy sets out six priorities for action:

1. Reduce the risk of suicide in key high-risk groups;
2. Tailor approaches to improve mental health in specific groups;
3. Reduce access to the means of suicide;

<sup>1</sup> It has been considered that the gender differences in suicide may have been attributable to the different choice of methods between males and females. With males choosing hanging, this method was more likely to result in death than drug poisoning. With hanging now being the most frequent method of suicide for females (although still less frequent than males), it is unlikely that this fully explains the difference.

4. Provide better information and support to those bereaved or affected by suicide;
5. Support the media in delivering sensitive approaches to suicide and suicidal behaviour;
6. Support research, data collection and monitoring.

The Government produces an annual report to review progress against the strategy, most recently *Preventing suicide in England: Third progress report (2017)*.

1.11. The Department of Health and NHS England published *Future in Mind – Promoting, protecting and improving our children and young people’s mental health and wellbeing* in March 2015. This identified five themes for the creation of a system that properly supports the emotional wellbeing and mental health of children and young people:

- Promoting resilience, prevention and early intervention;
- Improving access to effective support – a system without tiers;
- Care for the most vulnerable;
- Accountability and transparency;
- Developing the work force.

*Future in Mind* makes limited direct reference to suicide, but does note the rising numbers of young people presenting with self harm.

1.12. In February 2016, NHS England published the *Five Year Forward View for Mental Health*, following a review by an Independent Mental Health Task Force; this was followed in July 2016 by *Implementing the Five Year Forward View for Mental Health*.

1.13. The *Five Year Forward View for Mental Health* highlights a range of actions that should be taken to reduce suicide:

- Improving the seven day crisis response service across the NHS will help save lives as a major part of a drive to reduce suicide by 10% by 2020/21.
- The Department of Health, PHE and NHS England should support all local areas to have multi-agency suicide prevention plans in place by 2017, reviewed thereafter and supported by new investment (Recommendation 2).
- NHS Improvement and NHS England with PHE should identify what steps services should take to ensure that all deaths by suicide across NHS-funded mental health settings, including out-of-area placements, are learned from, and to prevent repeat events. This should build on insights through learning from never events, serious incident investigations and human factor approaches. The CQC should then embed this information into its inspection regime (Recommendation 57).

1.14. The implementation plan explains that, nationally, a further £25 million will be made available over the period to 2020-21 to support suicide prevention directly (£5 million in 2018-19, £10 million in 2019-20 and £10 million in 2020-21). It also expects the wider investment in mental health to have a positive impact on suicide rates.

- 1.15. The National Confidential Inquiry published *Making Mental Health Care Safer – Annual Report and 20 Year Review* (2016). It concludes that the number of suicides by mental health patients in the UK has increased in recent years. Suicide by mental health inpatients continues to fall, and there are now around three times as many suicides among patients in contact with Crisis Resolution and Home Treatment Teams (CRHTs). A third of CRHT patients who died of suicide had been under the service for less than one week, a third had been discharged from hospital in the previous two weeks and 43% lived alone.
- 1.16. The National Inquiry also found that over half of patients who died by suicide in the UK had a history of drug and alcohol problems, 13% had experienced serious financial difficulties in the previous three months, and 5% had been living in the UK for less than five years. Certain risk factors had become more common as antecedents for suicide in the last twenty years, including isolation, economic adversity, alcohol and drug misuse and recent self-harm. Non-adherence to medication is becoming less common as an issue.
- 1.17. In December 2016, the Health Select Committee published an interim support on suicide prevention to inform government thinking on a refresh of the national suicide prevention strategy. It highlighted five key areas for consideration:
- *Implementation*, arguing that the Government’s 2012 strategy had been characterised by inadequate leadership, poor accountability and insufficient action;
  - *Services to support people who are vulnerable to suicide*, including wider support for public mental health and wellbeing and targeted support for at risk groups;
  - *Adoption of consensus statement on sharing information with families* with better training for professionals;
  - *Timely and consistent data*, to enable swift and appropriate responses (e.g., to suicide clusters or new methods of suicide);
  - *Media*, including working more effectively with media breaches of reporting guidelines and looking at changes to restrict access to potentially harmful internet sites and content.
- 1.18. The interim report helpfully distinguishes three groups of people at risk of suicide:
- *Those not in contact with services*, who would benefit from greater emphasis on public mental health and wellbeing, and with a significant role for ‘non-traditional’ settings and the voluntary sector;
  - *People in contact with primary care*, with a need for training and support for GPs;
  - *Patients discharged from inpatient mental health care*, who should receive follow up support within three days, and not the current ten.

## **National guidance and best practice**

- 1.19. Public Health England has recently published a number of resources to support evidence-based practice; see section 8 Resources:

- 1.20. The National Confidential Inquiry *Annual Report and 20 Year Review* (2016) identifies ten key elements of safer care in mental health services and a further four for safer care in the wider health system.
- 1.21. The National Institute for Health and Care Excellence (NICE) is currently developing guidance on *Preventing Suicide in Community and Custodial Settings*, with an expected publication date of May 2018.
- 1.22. The Centre for Mental Health's *Aiming for Zero Suicide* report (2015) provides a review of research evidence on suicide prevention. It concludes: 'there is clear evidence that there are medical and psychological interventions which can be very helpful to individuals who have considered or attempted to end their own lives. However, the evidence of effective interventions designed to reduce the overall suicide rate across a whole population is sparse and largely inconclusive'.

DRAFT

### 3. Local Context

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*“A young woman has alcohol dependency, anxiety and depression, and has accessed many services. These included the Cedar ward in Rochford, various rehabs, detox centres, Alcohol & Drug Addiction Service (ADAS) in Harlow, Accident & Emergency departments (A&E), Crisis teams, GPs, medication and various therapies. She has used these therapies fairly recently and has now been sober for several months. She said that she relapses fairly regularly and has previously been sectioned. She feels support is lacking. She says that due to her eye contact and friendly nature she isn’t believed and her condition and thoughts of suicide are overlooked.”*

Case Study from Healthwatch 666 Report

- 3.12 The geography and organisational structure across wider Essex is complex. There are three local authorities, seven CCGs, two mental health trusts that are in the process of merging into a single trust, three adult safeguarding boards, three children’s safeguarding boards, and one police authority, one Police and Crime Commissioner, a category B prison and three Healthwatches. To further complicate the picture, Essex is covered by three NHS Sustainability and Transformation footprints (including two with other county councils).

#### **Sustainability and Transformation Plans**

- 3.13 NHS England now requires every health and care system in England to produce a multi-year Sustainability and Transformation Plan (STP) showing how local services will develop and ensure their sustainability over the next five years. To deliver these plans local health and care systems are divided into 44 STP ‘footprints’. The three ‘footprints’ for Essex are: Mid and South Essex, North Essex and Suffolk, and West Essex and Hertfordshire. STP plans have been produced for each of these areas with more detailed operational plans to follow.

The Mid and South Essex Success Regime STP plan has identified reducing suicide and self-harm as one of three key priorities for mental health given higher than average rates of suicide in the county. The West Essex and Hertfordshire STP plan identifies taking forward a multi-agency approach to suicide as a priority for promoting improved mental health. The Suffolk and North East Essex STP plan indicates a whole system approach to the delivery of specific services such as crisis mental health care and suicide prevention.

#### **Adult Mental Health and Wellbeing**

The *Southend, Essex and Thurrock Mental Health and Wellbeing Strategy 2017-2021* was launched in 2017. The strategy includes a chapter on suicide prevention and has included a commitment to reduce suicide rates by 10% against the 2016-17 baselines by 2020-21 in line with the national ambition set out in NHS England’s *Five Year Forward View for Mental Health*. It also considers the

particular challenges and opportunities for suicide prevention interventions within particular areas of practice, including perinatal mental health and working with people with personality disorders.

## **Children & young People's Mental Health and Wellbeing**

A new Emotional Wellbeing and Mental Health Service (EWMHS) was launched in November 2015. The new service has brought together the seven Clinical Commissioning Groups (CCGs) and the three local authorities in a single 'collaborative commissioning forum' with responsibility for all targeted and specialist support including a unified crisis response across Southend, Essex and Thurrock, with delivery led by a single provider (NELFT).

The same partners have developed a Local Transformation Plan – *Open up, Reach out* - as part of the national *Future in Mind* initiative to improve the mental health and emotional wellbeing of children and young people. *Open Up, Reach Out* recognises that 'the risk of suicide and self-harm is one of the major concerns of children and young people, families, carers and school staff'.

Priorities for self-harm and suicide reductions includes support with dedicated people in locality teams who have particular skills in suicide prevention and managing self-harm;

## **Crisis Care Concordat**

The 2014 Crisis Care Concordat is a national agreement between services and agencies involved in the care and support of people in crisis. It sets out how organisations will work together better to make sure that people get the help they need when they are having a mental health crisis.

The Concordat focuses on four main areas:

- Access to support before crisis point – making sure people with mental health problems can get help 24 hours a day and that when they ask for help, they are taken seriously.
- Urgent and emergency access to crisis care – making sure that a mental health crisis is treated with the same urgency as a physical health emergency.
- Quality of treatment and care when in crisis – making sure that people are treated with dignity and respect, in a therapeutic environment.
- Recovery and staying well – preventing future crises by making sure people are referred to appropriate services.

Although the Crisis Care Concordat focuses on the responses to acute mental health crises, it also includes a section on prevention and intervention. Rather than replacing existing guidance, it was designed to provide a framework on which to build further action. The full document can be viewed here: [http://16878-presscdn-0-18.pagely.netdna-cdn.com/wp-content/uploads/2014/04/36353\\_Mental\\_Health\\_Crisis\\_accessible.pdf](http://16878-presscdn-0-18.pagely.netdna-cdn.com/wp-content/uploads/2014/04/36353_Mental_Health_Crisis_accessible.pdf)



Locally, the Crisis Care Concordat agreement is actioned through separate Crisis Concordat Groups across the different health, i.e. CCG geographies.

The North Essex Crisis Care Concordat Action Plan includes a comprehensive set of actions to deliver suicide prevention to primary care, secondary care and the emergency services. It highlights the importance of working with the British Transport Police regarding suicide prevention, including 'daily updates of suspicious activity of identified persons on the railways or near to'.

The SW Essex Crisis Care Concordat Action Plan (2014) highlights the need to involve British Transport Police in suicide prevention projects, and this work has since been taken forward.

The South East Essex Crisis Care Concordat Action Plan (2014) includes a number of actions and outcomes on suicide prevention, including:

- Developing a 'commissioning for prevention' approach with public health;
- Improving early intervention in psychosis services;
- Working with British Transport Police and other relevant agencies to reduce risk.

A Pan Essex System Preparedness Plan has been developed collaboratively by representatives of the 7 Essex CCGs, 3 Local Authorities, 5 Acute Trusts, 2 Mental Health Trusts, Ambulance Service Trust and Essex Police in response to the proposed amendments of the Mental Health Act (1983) by the Policing and Crime Bill (2016).

## **Safeguarding**

### **Children's Safeguarding**

Children's' safeguarding is a mandatory duty for local authorities, covered across Essex by three separate Children's' Safeguarding Boards for Southend, Essex and Thurrock residents. Despite boards being arranged by local authority/ resident geography, SET safeguarding procedures are agreed to provide continuity of systematic process across the greater Essex patch.

A Strategic Child Death Overview Panel for Southend, Essex and Thurrock supported by five local Child Death Review Panels is responsible for reviewing the deaths of any children - including deaths as a result of suicide - normally resident in the Greater Essex area, with a responsibility for: reducing the numbers of deaths; identifying matters of concern affecting the safety and welfare of children; identifying wider public health or safety concerns; and undertaking a co-ordinated agency response to all unexpected deaths of children.

The Essex Safeguarding Children Board has produced a Prevention of Youth Suicide Guidance Toolkit for Schools for use by professionals working with children and young people, which is being

reviewed.<sup>2</sup> As part of the development and roll out of the Toolkit, the ESCB supported workshops with 'Stay Safe' groups on teenage suicide, and quadrant based Case Review Learning Events on suicide among young people. Supplementary self-harm guidance is also currently in development.

### **Adults Safeguarding**

The Care Act 2014 requires that all local authorities establish a Safeguarding Adults Board to oversee the work of agencies within its area to ensure that they are working effectively to prevent abuse and neglect of adults at risk. The aim of the SABs is to ensure the effective co-ordination and delivery of services to safeguard and promote the welfare of at risk adults in accordance with the Care Act 2014 and the accompanying Statutory Guidance.

Adults safeguarding is less formally regulated, since only specific groups of adults are deemed vulnerable. Across Southend, Essex and Thurrock the SABs mirror the functionality of the Children's Boards to optimise safeguarding procedures and share lessons learned around incident review. The SABs has a broad membership including statutory, voluntary and independent organisations.

The SABs meet regularly and receives leadership and support from an Executive Group and Operational Group that have different roles to ensure that abuse and neglect are prevented.

Board members work together to ensure that all organisations that buy services for, or provide services to adults at risk have effective policies and procedures in place to prevent abuse and neglect, and to respond appropriately and quickly when things do go wrong.

All of the Board's decisions and actions are carried out with the Six Safeguarding Principles in mind: Empowerment, Prevention, Proportionality, Protection, Partnership and Accountability.

### **Mid Essex Suicide Prevention Pilot**

The Mid-Essex Suicide Prevention Project is one of a group of four pilots led by the East of England Strategic Clinical Network. It was set up in 2013 and is based on a 'Zero Suicide' approach pioneered by Dr Ed Coffey in Detroit.

The Zero Suicide initiative is one of six programmes of work explored in the ECC/Public Office report, *Hope for Better Mental Health – Exploring Co-Production and Recovery*, which considers initiatives 'in which recovery and co-production are combined with powerful results in the form of radically improved outcomes for service users'.<sup>3</sup>

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<sup>2</sup> ESCB (2015), [Prevention of Youth Suicide Guidance Toolkit for Schools](#).

<sup>3</sup> ECC/The Public Office (2015), [Hope for Better Mental Health – Exploring Co-Production and Recovery](#).

## **Role of the voluntary and community sector**

A range of voluntary and community sector organisations provide services to people known to have mental health problems, including those who may be at risk of suicide, as well as individuals and families experiencing other problems that may heighten risk (e.g. drug and alcohol problems or debt). These organisations include the Citizens Advice Bureau (CAB), Depression Alliance, MIND, Open Door, Open Road, Phoenix Futures, and the Samaritans.

The Recovery College <http://inclusionthurrock.org/recovery-college/> is a partnership between Inclusion Thurrock (part of the NHS), Thurrock Mind (a charity with a proud tradition of helping those experiencing difficulties with their mental health), and the students of the college. The Recovery College is about providing educational courses to promote mental wellbeing.

Thurrock have a pilot project in conjunction with St Mungo's called Housing First which will look to prevent homelessness in a small referred group of residents who are referred. Prior history of self-harm/suicide attempts form part of the risk criteria to determine whether they are eligible for inclusion onto the pilot.

## **Local response to *Preventing Suicide in England***

In 2013 the All Party Parliamentary Group on Suicide and Self-Harm Prevention published its initial deliberations. This was followed by The All-Party Parliamentary Group (APPG) on Suicide and Self-Harm Prevention Inquiry into Local Suicide Prevention Plans in England 2015. The main recommendations from the latter were that all local authorities must have in place:

- a) Suicide audit work to in order to understand local suicide risk.
- b) A suicide prevention plan in order to identify the initiatives required to address local suicide risk.
- c) A multi-agency suicide prevention group to involve all relevant statutory agencies and voluntary organisations in implementing the local plan.

In response to these recommendations this document contains:

- a) The 2014/15 Southend, Essex and Thurrock Suicide Audit – summary in Section 4: Suicide audit and the full report published alongside this strategy.
- b) This report references key actions that have been identified as tackling suicide prevention – see section 5: Actions
- c) Recommendations around the governance for actions on suicide prevention – see section 7 of Recommendations.

## 4. Suicide audit

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The full data report can be found in the SET suicide audit 2014/15 report that will be published alongside this strategy. Key findings are presented here.

### Demographics

Approximately 73% of suicide cases were male, with approximately 27% being female. Most deaths occur in the age range 40-49 and 50-59 although Southend has a peak in 30-39 and Thurrock in the 20-29 year age groups. It is difficult to extrapolate on ethnicity as this was frequently not recorded.

### Means of Death

Hanging and poisoning were the most common means of death for men and women respectively; this is slightly contrary to the national picture where hanging is usually most common for both sexes, and locally may reflect the high incidence of poisoning seen in Southend.

### Suicide Locations

Place of death is defined by the location where the person was officially pronounced dead. Most deaths take place at home; however, of the audited deaths, a number died elsewhere in incidents involving open water, railway lines, or open spaces such as farm or field, and a few died in hospital after being conveyed there after an episode of injury elsewhere.

We did not explore death by suicide related to deprivation mapping postcode to ward and deprivation score; wards with higher deprivation scores are more likely to have higher rates of death by suicide.

### Suicide and access to healthcare

Data completeness in the coroner's report meant that it was not always possible to be sure whether someone had or had not been seen recently by healthcare services such as mental health, GP or A&E.

Where records were available, the local picture is similar to the national in that a significant number are in current contact or known to mental health services within the last 12 months. The most common mental health conditions were depression and anxiety, with a smaller number of people diagnosed with Bipolar affective disorder or schizophrenia/ personality disorder.

In general practice, this contact may have been for reasons of mental health, physical health or simply a routine appointment, and represents an opportunity to recognise and offer support.

Very few had a record of contact with A&E but that may reflect data completeness.

### **Clinical and social factors**

Where available in the record we were able to note factors such as bereavement, financial issues, forensic history, physical illness and disability, and relationship issues. All were prevalent in the deaths reviewed with illness and financial issues the most common. A small but significant number had a recorded history of misuse of drugs and/or alcohol. The highest number lived alone and a number had a shared living situation (living with friends, living in a hostel or another form of house-share).

### **Suicide in young people**

The Southend Essex & Thurrock Strategic Child Death Overview Panel commissioned a review to explore what further actions SCDOP can take to reduce the risk of youth suicide in SET areas. Membership of the Group was made up from representatives of the Child Death Overview Panel and representatives of partner agencies

A summary of each of the 11 cases over the last 3 years was reviewed with a focus on the last 6 cases which occurred over the last 12 months.

#### **Key findings and conclusions:**

- Most of the young people were not previously known to services. In some cases the young people had been noted by their family as appearing happy and behaving normally on the day of the suicide. The time between making the decision and carrying out the attempt may be very short, 10 minutes to one hour. Boys, especially, are liable to act impulsively.
- Hanging was the means of death for 10 of the 11 young people (poisoning accounting for the other).
- It was not always clear whether death was the intention, or whether accidental or a fatal self-harm episode.
- Need to build resilience and problem solving strategies for young people
- Online support is key for children and young people. Appropriate support needs to be easy to find but it is difficult to ensure that the right pages appear at the top of the list when using online search facilities.
- Youth champions within schools could be used as young people will often talk about their concerns to peers first, before teachers or professionals.
- The involvement in suicide prevention work by schools who have had experience of supporting staff, children and families following the suicide of a child would be useful. It is felt that the schools involved would be keen to engage.

## 5. Tackling Suicide prevention in Southend, Essex and Thurrock

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*‘There is a certain attitude amongst professionals that “you can’t stop people killing themselves”. It’s pervasive. There is also a feeling that you shouldn’t involve families and carers and that you shouldn’t talk openly about suicide because it gives people ideas and makes them more likely to attempt suicide. This just isn’t the reality. Doing something is better than doing nothing’.*

Strategic Lead, Zero Suicide from ECC/Public Office *Hope for Better Mental Health*

**Preventing Suicide in England** identified six key areas for action to support delivery of the objectives:

- 1 Reduce the risk of suicide in key high-risk groups
- 2 Tailor approaches to improve mental health in specific groups
- 3 Reduce access to the means of suicide
- 4 Provide better information and support to those bereaved or affected by suicide
- 5 Support the media in delivering sensitive approaches to suicide and suicidal behaviour
- 6 Support research, data collection and monitoring

This section signposts the key partnerships, agencies, strategies and actions which have relevance for suicide prevention across wider Essex. This summary of local action should be read in conjunction with the full strategies and action plans; these include both generic and suicide prevention specific actions from the most relevant strategies and action plans.

There are other actions not noted here that reflect the responsibilities of various agencies on social determinants of suicide risk such as debt, employment & the economy, housing; these actions primarily focus on achieving other outcomes but which have the additional benefit of reducing the risk of suicide.

### *Southend Essex and Thurrock Mental Health Strategy 2017 – 2021*

This strategy has been developed collaboratively by the three local authorities (Southend, Essex and Thurrock) and seven clinical commissioning groups across Greater Essex. The implementation plan is currently in development across key areas of children & young people, perinatal mental health, adults common mental health problems, adults community mental health, adults acute and crisis, health and justice, adult secure pathways, and suicide prevention; there is a supportive piece on communications and engagement. The plans are being overseen by an implementation group.

In addition, the CCGs have quality and performance oversight of Essex Partnership University Trust; this will include their oversight of any CQC inspections including any remedial plans to address suicide risks in inpatient settings.

Under the Crisis Concordat, a Pan Essex System Preparedness Plan has been developed collaboratively by representatives of the 7 Essex CCGs, 3 Local Authorities, 5 Acute Trusts, 2 Mental Health Trusts, Ambulance Service Trust and Essex Police in response to the proposed amendments of the Mental Health Act (1983) by the Policing and Crime Bill (2016).

Collaborative Commissioning Forum for the Emotional Wellbeing and Mental Health of Children and Young People in Southend, Essex and Thurrock *Open Up Reach Out – transformational plan for emotional wellbeing and mental health of children and young people in Southend Essex and Thurrock 2015 - 2010*

[https://www.essex.gov.uk/Documents/Full\\_version\\_Open\\_up\\_Reach\\_out\\_v17.pdf](https://www.essex.gov.uk/Documents/Full_version_Open_up_Reach_out_v17.pdf)

This strategy has been developed collaboratively by the three local authorities (Southend, Essex and Thurrock) and seven clinical commissioning groups across Greater Essex.

NHSE and Chelmsford Prison Health and Social Care Partnership Board is accountable for delivery of care in Chelmsford Prison including response and actions relating to investigations of suicide in Chelmsford Prison.

Southend Essex and Thurrock Domestic Abuse Strategic Board has produced its strategy which aims to assist partnerships and agencies across Greater Essex in delivering appropriate joined up responses to those affected by domestic abuse.

[http://dnn.essex.gov.uk/Portals/68/Professionals/Domestic%20Abuse/2015%2009%2024%20Essex%20DA%20Strategy%20\(1\).pdf](http://dnn.essex.gov.uk/Portals/68/Professionals/Domestic%20Abuse/2015%2009%2024%20Essex%20DA%20Strategy%20(1).pdf)

The three local authorities have different discrete treatment systems for the management of drugs and alcohol services; the quality of substance misuse services are governed by PHE.

In Essex, the system operates a 'no wrong door' approach. The key point of contact for all individuals, professional and or public, is the Choices service, provided by Open Road and the Children's Society. Contact details are: 0844 499 1323 and Choices sites are located in all of the key urban centres across Essex.

Network Rail will notify and work with the local authorities where three or more suicidal incidents have occurred at any local stations within 12 months (suicides or injurious attempts). Network Rail has key partnerships with British Transport Police and the Samaritans.

<https://www.networkrail.co.uk/communities/safety-in-the-community/suicide-prevention-railway/>

The Essex Civilian Military Partnership Board, established as part of the commitment to the Essex Armed Forces Community Covenant, is organised around 5 key pillars — Health and Wellbeing, Economy and Skills, Safer and Stronger Communities, Education, Children and Young People, and Environment and Infrastructure - each of which addresses key suicide risk factors.

Thurrock has set up a Suicide Prevention Multi-Agency Group (SPMAG). The group will play an active role in developing a local strategy and action plan. The group is comprised of key partner organisations and stakeholders and reports to The Thurrock Health and Wellbeing Board. Emotional health and wellbeing is included in Thurrock Council's Health and Wellbeing Strategy (2016-21).

## **1. Reduce the risk of suicide in key high-risk groups**

The key high risk groups include:

- Young and middle aged men
- People in the care of mental health services, including inpatients
- People with a history of self-harm
- People in contact with the criminal justice system
- Specific occupational groups, such as doctors, nurses, veterinary workers, farmers and agricultural workers

The audit data (see section 4 above for summary, full report published alongside this strategy) shows a higher than expected risk for young and middle age men with Thurrock and Southend and in older age groups in Essex. The audit showed the expected pattern of in care of mental health services, history of self-harm and contact with the criminal justice system. Data on occupation is available for suicide deaths in Southend, Essex and Thurrock but has not yet been analysed for this report as the focus was predominantly on employment status rather than specific occupations per se; the specific at risk occupations did not present within the audit although this may simply be due to small numbers (unreported data).

The Community Resilience Fund was used to launch the Essex Shed Network facilitated by Maldon CVS <https://essexshednetwork.wordpress.com/>. Active Essex including, Active Thurrock and Active Southend, are supporting local organisations to bid for funding for young people and disadvantaged communities. Initiatives such as these aim to reach out to men who do not typically engage with health and care services.

The Southend, Essex and Thurrock Mental Health strategy outline the actions and intentions to improve mental health and wellbeing locally. Various chapters of that strategy describe the efforts of the health and care system and wider partners to improve mental health services and outcomes across Greater Essex; these actions will have a positive impact on suicide prevention as a key outcome of success. These chapters outline action to target specific at risk groups as well as general improvements in health and wellbeing across the population. The chapters specifically highlight people in the criminal justice system in addition to the general population. What is less clear is how interventions may need to be further tailored for different groups.

Essex Partnership University Trust (NEP and SEPT trust merger from 1<sup>st</sup> April 2017) have produced actions in response to CQC inspection recommendations as to environment and safety e.g. addressing ligature risks.

The criminal justice system has a responsibility for risk assessment for those it comes into contact with. The prison, police and the probation / community rehabilitation services have risk assessment processes in place to inform custodial, sentencing and release plans with repeat assessment for significant changes in circumstances. Staff are not specifically trained in mental health although they do have training in safeguarding and core competence in risk assessment and management. There are recommendations in place on safe environments to minimise risk; The Pan Essex



Preparedness Plan addresses place of safety and Chelmsford prison has an action plan in place following recent inspections.

The Essex Rural Partnership is an opportunity to raise the profile of suicide risks in specific occupational groups such as farmers and agricultural workers.

Within the health care system, there are targets and incentives around staff mental health and wellbeing. Local Public Health teams are developing initiatives around healthy workplaces and workforce.

## **2. Tailor approaches to improve mental health in specific groups:**

The additional specifically identified groups are:

- Children and young people, including those who are vulnerable such as looked after children, care leavers and children and young people in the Youth Justice System
- Survivors of abuse or violence, including sexual abuse
- Veterans
- People living with long-term physical health conditions
- People with untreated depression including perinatal depression
- People who are especially vulnerable due to social and economic circumstances
- People who misuse drugs or alcohol
- Lesbian, gay, bisexual and transgender people
- Black, Asian and minority ethnic groups and asylum seekers

A new emotional wellbeing and mental health service for children and young people was launched locally in 2015. All targeted and specialist services across wider Essex are now delivered by one organisation with locality-based teams managing local services, as well as working with schools, children centres and the voluntary, community and social enterprise sector (VCSE) on universal support and NHS England on acute services. Risk avert - which is being delivered in 30 Essex schools - supports young people to build resilience, learn skills to manage risk and become more connected at school.

*Open up, reach out – Transformation plan for the emotional wellbeing and mental health of children and young people in Southend, Essex and Thurrock* includes a specific commitment to work together with the local safeguarding children boards, local authorities and local schools.

The Children and Young People's Plan for Essex launched in 2016 includes a range of further actions to address risk and build resilience, with a particular focus on the most vulnerable <http://www.escb.co.uk/Portals/67/Documents/C%20and%20YP/ECC%20Children%20Young%20People%20Plan.pdf>

The ECC Children's' Mental Health Commissioner leads the strategic integration of mental health across children's settings on behalf of 7 CCGs and 3 local authorities. Prevention of Youth Suicide Guidance Toolkit for Schools was recently developed which now sits with the Essex Children's' Safeguarding Board to drive consistent countywide implementation. A supplementary self-harm guidance is also currently in development. New digital resources are being explored to complement the delivery of this agenda across all children's settings, including education.

The Essex Civilian Military Partnership Board, established as part of the commitment to the Essex Armed Forces Community Covenant, is organised around 5 key pillars — Health and Wellbeing, Economy and Skills, Safer and Stronger Communities, Education, Children and Young People, and Environment and Infrastructure - each of which addresses key suicide risk factors. There is a North Essex Veterans Mental health Network and the existing Veterans First service has been replaced by the newly launched national Veterans' Mental Health Transition, Intervention and Liaison Service.

CCGs are increasingly targeting the provision of IAPT (improving access to psychological therapies) to those with long term physical illness.

The development of a new, integrated 0-19 service provides an opportunity to review and develop the role of health visitors and other key professionals in identifying mothers who may be experiencing perinatal mental health issues. New funding has been secured for mental health midwives.

Ongoing monitoring of drug related deaths/ serious untoward incidents and the associated learning outcomes inform service development to address effective identification and support as part of the suicide prevention agenda. ECC operates a confidential enquiry process into drug related deaths and on a quarterly basis reviews possible trends and root causes to ensure that system-wide learning is disseminated and implemented where required.

The suicide audit showed the expected national trends of the majority of suicides occurring in people not known to mental health services but experiencing everyday pressures of social, personal and financial vulnerability. Agencies such as job centres/ DWP, Citizens advice bureaus, faith groups etc are all key points for a making every contact count approach. Further work may be needed to develop the role of these agencies in the suicide prevention agenda.

There were some noticeable gaps. The suicide audit noted poor recording on some characteristics including ethnicity & sexual orientation, and it is unclear how services account for equality and diversity and the specific needs of those with protected characteristics. It has been noted nationally about immigrants as an emerging risk group; we were unable to determine any local patterns within the audit as the data was insufficient to analyse this characteristic.

In 2013, the East of England Strategic Clinical Network established the 'zero suicide' programme in our region, with Mid-Essex CCG selected to lead the pilot in Essex, one of four across the region. These pathfinder initiatives have had a particular focus on reaching out beyond the 'usual suspects' to engage the widest range of partners in suicide prevention, including coroners, librarians, gym staff, housing association staff, publicans, social care assistants, paramedics, faith groups, Football Association Staff, CCG employees, private security staff and the British Transport Police. The Mid-Essex pilot had a particular focus on:

- Developing training programmes for third sector and voluntary organisations; and
- Training community nurses, primary care staff, GPs, police, British Transport Police, drug and alcohol staff and paramedics.

### **3. Reduce access to the means of suicide:**

The majority of suicides reviewed in the audit were by means of hanging, usually in the home but sometimes in more public places. Jumping, firearms and asphyxiation were rarer means of suicide locally.

Secured placements - including criminal justice custody and mental health inpatient settings – have clear guidance about environmental safety planning. There is a role for environmental planning for the local authorities, and Community Safety Partnerships produce community safety plans which are an opportunity to explore further opportunities to address physical locations as means of suicide.

Network Rail will notify and work with local authorities where three or more suicidal incidents have occurred at any local stations within 12 months (suicides or injurious attempts). Each station will be assessed and physical and psychological barriers to be considered as part of a layered approach to mitigations. Network Rail will increase the opportunity and capacity for interventions e.g. continue to provide 'Managing Suicidal Contacts' training to all staff; increase opportunities for help seeking by suicidal individuals; ensure Samaritans signs are in stations particularly at specific access points with additional posters and cases made available and displayed at stations and Samaritans material displayed within waiting rooms; and seek other opportunities such as digital media. Network Rail are particularly keen to change the public image of such sites and work with local media to ensure they are aware and work within the Samaritans media guidelines (see area action 5 below).

The audit also identified waterways as a chosen location; there is a noticeable lack - nationally and locally - about the role of the Maritime and Coastguard Agency and RNLI, similar to that of Network Rail. The RNLI are keen to explore their community safety role further.

Prescribing for substance misuse is via EPUT or GPs who have to work to national and local guidance; this ensures that new or unstable patients are prescribed the medication as supervised consumption. Whilst most patients would come off supervised consumption after a few months those with more complex needs or lack of housing are kept on supervision to ensure they see a healthcare professional almost daily. All clients coming out of prison are given appointments in the community and put on a supervised consumption prescription. The Take Home Naloxone program has trained those who use drugs and their friends and family in using the injection so that if they see someone overdose they can administer Naloxone which reverses the overdose until a paramedic arrives.

#### **4. Provide better information and support to those bereaved or affected by suicide:**

It was recognized in the 2012 *Preventing Suicide in England strategy* that bereavement through suicide was an area poorly covered by previous suicide prevention strategies. Bereavement is also itself a risk factor for suicide. In addition, those affected by the loss of a loved one through suicide will have specific needs.

There are several bereavement charities and organisations, some of which specialize in helping those affected by suicide.

The agencies whose staff are most likely in contact with those deaths by suicide offer support to staff through debriefing, professional supervision and occupational health; these may not be comprehensive across all relevant agencies and uptake can be affected by a reluctance to seek help.

**5. Support the media in delivering sensitive approaches to suicide and suicidal behaviour.**

It is known that the reporting of suicides by the media can promote other suicides – particularly using the same method or at the same location and that responsible reporting of suicide or reduced reporting can decrease suicides at frequently locations.

There are media guidelines on the reporting of suicide that set out clear instructions and recommendations on what an article should contain when it reports a death by suicide (see resources section 8).

**6. Support research, data collection and monitoring.**

The three local authority public health teams have completed an audit of 2014/15 deaths which is summarised in section 3 and full audit report appended to this strategy. Further work is needed locally to schedule more regular audit and surveillance.

Various agencies e.g. Network Rail & BTP, mental health trusts, prison, substance misuse services, undertake regular reviews of deaths within their services to understand root cause.

## 6. Suicide Prevention Group

In 2013 the *All Party Parliamentary Group on Suicide and Self-Harm Prevention* published its initial deliberations. This was followed by *The All-Party Parliamentary Group (APPG) on Suicide and Self-Harm Prevention Inquiry into Local Suicide Prevention Plans in England 2015*. The main recommendations from the latter were that all local authorities must have in place:

- a) Suicide audit work to in order to understand local suicide risk.
- b) A suicide prevention plan in order to identify the initiatives required to address local suicide risk.
- c) **A multi-agency suicide prevention group to involve all relevant statutory agencies and voluntary organisations in implementing the local plan.**

The intent of this Suicide Prevention Strategy - in this first year iteration – is to collate and cross reference the strategic intent and action plans of the various organisations and partnerships – many mentioned throughout this strategy – that have a role to play in suicide prevention across Essex.

The geography and organisational structure across wider Essex is complex. There are 3 local authorities, 7 CCGs, 2 mental health trusts, 3 adult safeguarding boards, 3 children’s safeguarding boards, one police authority, one Police Crimes Commissioner, three Healthwatches, etc. Essex is covered by 3 Sustainability & Transformation footprints (including two with other county councils) which may have implications for how organisations collaborate in the future.

Forums are variously organised on local government boundaries and/or pan CCG boundaries. Certain partner agencies, e.g. the police, cover wider Essex. As such, there is no one forum that encompasses the entirety of the suicide prevention agenda across wider Essex. Setting up a suicide prevention group – whilst focusing on the specific agenda - will not necessarily have robust governance and will have duplication of membership.

The approach taken in the strategy is to recommend that the actions are owned by the responsible organisations and partnerships, with annual oversight by the Health & Wellbeing Boards and an annual summit focused solely on suicide prevention. This recognises the complex geography of Southend, Essex and Thurrock with overlapping boundaries and jurisdictions which require both local and shared approach to suicide prevention.

This approach still allows for local flexibility whilst maintaining a pan Essex overview especially for those partners who cross local boundaries whether NHS or other.

## 7. Recommendations

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In addition to the actions already intended by the relevant organisations and partnership forums, we have identified the following additional recommendations for action.

### **1: Reduce the risk of suicide in key high-risk groups**

- 1.1 That organisations and forums undertake an impact assessment (similar to equality impact assessment) using the characteristics identified as high risk and apply to their current and intended interventions to ensure that each group has the best evidenced based targeted interventions
- 1.2 Explore feasibility of equipping people who are most likely to encounter people with mental health issues or suicidal thoughts with the skills and confidence to support them and to enable them to seek professional help (as per Zero Suicide initiative)

### **2: Tailor approaches to improve mental health in specific groups**

- 2.1 As per recommendations 1.1, 1.2,

### **3: Reduce access to the means of suicide**

- 3.1 That the intelligence task & finish group (see 6.1) check for possible frequently used locations
- 3.2 Explore further with the Maritime and Coastguard Agency and RNLI about deaths associated with our local waterways.
- 3.3 Explore further with Community Safety Partnerships actions to address any other frequently used locations.
- 3.4 Be prepared to convene task and finish group if a cluster of suicide deaths is identified.

### **4: Provide better information and support to those bereaved or affected by suicide**

- 4.1 Information for those bereaved as a result of suicide should be made available through professionals and other organisations in first & follow up contact with bereaved people (Police Officers, prison staff, ambulance staff, coroners, GPs, death registration professionals and funeral directors etc).

### **5: Support the media in delivering sensitive approaches to suicide and suicidal behaviour**

- 5.1 Design and delivery a comprehensive communications plan as part of the existing “Lets Talk About It” branding, with an intelligently mapped timeline (targeting known risk groups at times of high risk such as the start of school/ college terms, linking to national and local partnership campaigns).
- 5.2.a Ensure all professionals in contact with the media are aware of guidelines for reporting suicide.
- 5.2.b Liaise with local media to encourage reference to and use of guidelines for the reporting of suicide.

## **6: Support research, data collection and monitoring**

- 6.1 A Task and Finish Group should be set up to design the audit schedule including the potential value of 'real time' surveillance and analysis of location/means to ascertain if any frequently used locations or emerging clusters.
- 6.2 Partners should be encouraged to respond to requests from the Office of the Coroner to provide the required data for inquests. In particular, capturing data on ethnicity is gaining importance as some other areas are observing trends in suicides in immigrants/white other categories which may indicate particular risks.
- 6.3 Organisations that experience deaths directly e.g. prisons, mental health services, rail, should share their thematic analysis of deaths for wider lessons learnt. We would also encourage GPs to review suicides as part of unexpected deaths audit to understand any lessons to be shared.

## **7: Planning and governance**

- 7.1 That suicide prevention remains the business of the noted partnerships, with regular standing item (at a minimum annually) on suicide prevention
- 7.2 That each forum with a responsibility for suicide prevention nominates a member of that forum to be a suicide prevention champion
- 7.3 That we convene an annual summit of all partner agencies to review progress, which will report to the HWBs
- 7.4 That the Health & Wellbeing Boards hold the accountability for this multi- agency agenda and that they review progress on an annual basis

## 8. Resources

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### 1. Reduce the risk of suicide in key high-risk groups

- Mental health of adults in contact with the criminal justice system (in development, due march 2017) <https://www.nice.org.uk/guidance/indevelopment/gid-cgwave0726>
- Preventing suicide in communities and custodial settings (in development, due 2018) <https://www.nice.org.uk/guidance/indevelopment/gid-phg95>

### 2. Tailor approaches to improve mental health in specific groups:

- The Risk Avert website is at <http://www.risk-avert.org/>
- The Essex Lifestyle Service website is at <http://www.essexlifestyleservice.org.uk/>The App can be downloaded at <https://itunes.apple.com/gb/app/lifestyle-essex/id967932040?mt=8>
- NICE guidelines (CG16) Self-harm in over 8s: short-term management and prevention of recurrence <https://www.nice.org.uk/guidance/CG16>
- NICE guidelines (CG133) Self-harm in over 8s: long- term management , <https://www.nice.org.uk/guidance/cg133>
- Department of Health and NHS England Future in mind: promoting, protecting and improving our children and young people's mental health and wellbeing
- NICE guidelines (CG90) Depression in adults: recognition and management
- North Essex Veterans Mental Health Network <http://www.nevmhn.org.uk/>
- Preventing suicide among lesbian, gay and bi sexual young people: a toolkit for nurses; and Preventing suicide among trans young people <https://www.gov.uk/government/publications/preventing-suicide-lesbian-gay-and-bisexual-young-people>
- Sources of information and support for families, friends and colleagues who are concerned about someone who may be at risk of suicide [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/137640/Sources-of-information-and-support-for-families.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/137640/Sources-of-information-and-support-for-families.pdf)

### 3. Reduce access to the means of suicide:

- Preventing suicides in public places [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/481224/Preventing-suicides-in-public-places.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/481224/Preventing-suicides-in-public-places.pdf)
- Identifying and responding to suicide clusters and contagion: a practice resource [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/459303/Identifying-and-responding-to-suicide-clusters-and-contagion.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/459303/Identifying-and-responding-to-suicide-clusters-and-contagion.pdf)

### 4. Provide better information and support to those bereaved or affected by suicide:

- Support after suicide: a guide to providing local services [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/582095/Support\\_after\\_a\\_suicide.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/582095/Support_after_a_suicide.pdf)
- Support after suicide: developing and delivering local bereavement support services <http://www.nspa.org.uk/wp-content/uploads/2017/01/NSPA-postvention-framework-20.10.16.pdf>
- Help is at hand: support after someone may have died by suicide <http://supportaftersuicide.org.uk/help-is-at-hand/>



- <http://supportaftersuicide.org.uk/>
  - Guide to Coroners and Inquests and Charter for Coroner Services
  - The Inquest Handbook: A guide for bereaved families, friends and their advisors.
  - The Road Ahead... A guide to dealing with the impact of suicide, published by Mental Health Matters. [www.mentalhealthmatters.com](http://www.mentalhealthmatters.com)
  - Health talk online, a website where people can share experiences of ill health and bereavement, including bereavement by suicide. [www.healthtalkonline.org](http://www.healthtalkonline.org)
  - If U Care Share, a website and campaign organisation with links to sources of support. [www.ifucareshare.co.uk](http://www.ifucareshare.co.uk)
  - Winston's Wish, bereavement support for children and young people. [www.winstonswish.org.uk/](http://www.winstonswish.org.uk/)
  - Cruse Bereavement Care <http://www.cruse.org.uk/>
  - Survivors of Bereavement by Suicide, a self-help organisation to meet the needs and break the isolation of those bereaved by the suicide of a close relative or friend. [www.uk-sobs.org.uk/](http://www.uk-sobs.org.uk/)
  - The Compassionate Friends, support for bereaved parents and their families after a child dies. [www.tcf.org.uk/](http://www.tcf.org.uk/)
- 5. Support the media in delivering sensitive approaches to suicide and suicidal behaviour.**
- Samaritans media guidelines for the reporting of suicide and related resource materials <http://www.samaritans.org/media-centre/media-guidelines-reporting-suicide>
- 6. Support research, data collection and monitoring.**
- Suicide profile <https://healthierlives.phe.org.uk/topic/suicide-prevention> or <http://fingertips.phe.org.uk/profile-group/mental-health/profile/suicide>

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## Useful reading

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# Appendices

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## Appendix 1: Suicide definitions

A1.1 Most recent reports<sup>4</sup> draw particular attention to the definition of suicide as currently used by the Office of National Statistics (ONS), which reflects the coding used by the WHO (ICD-10). Thus, the UK definition of suicide now includes death from: (a) intentional self-harm; (b) injury/poisoning of undetermined intent; and (c) as a secondary consequence ('sequelae') of intentional self-harm/event of undetermined intent.

A1.2 This definition will differ from a Coroner's verdict of suicide. Coroners record a verdict of suicide only when there is evidence beyond reasonable doubt that the injury was self-inflicted, and the deceased intended to take their own life (DH, 2015). Research studies tend to show that the majority of open verdicts are most likely suicides, although they do not meet the high legal standard of evidence required for a coroner to record a suicide verdict.

A1.3 In this paper we use the term suicide to refer to deaths from both intentional self-harm and injury or poisoning of undetermined intent (as adopted by the ONS).<sup>5</sup>

A1.4 It should be noted that suicides are recorded following inquest, and that inquests may not be conducted in the year of death. This will have an inevitable impact on the accuracy of statistical returns for any one year but is considered unlikely to have a great impact on the usability of UK suicide statistics.

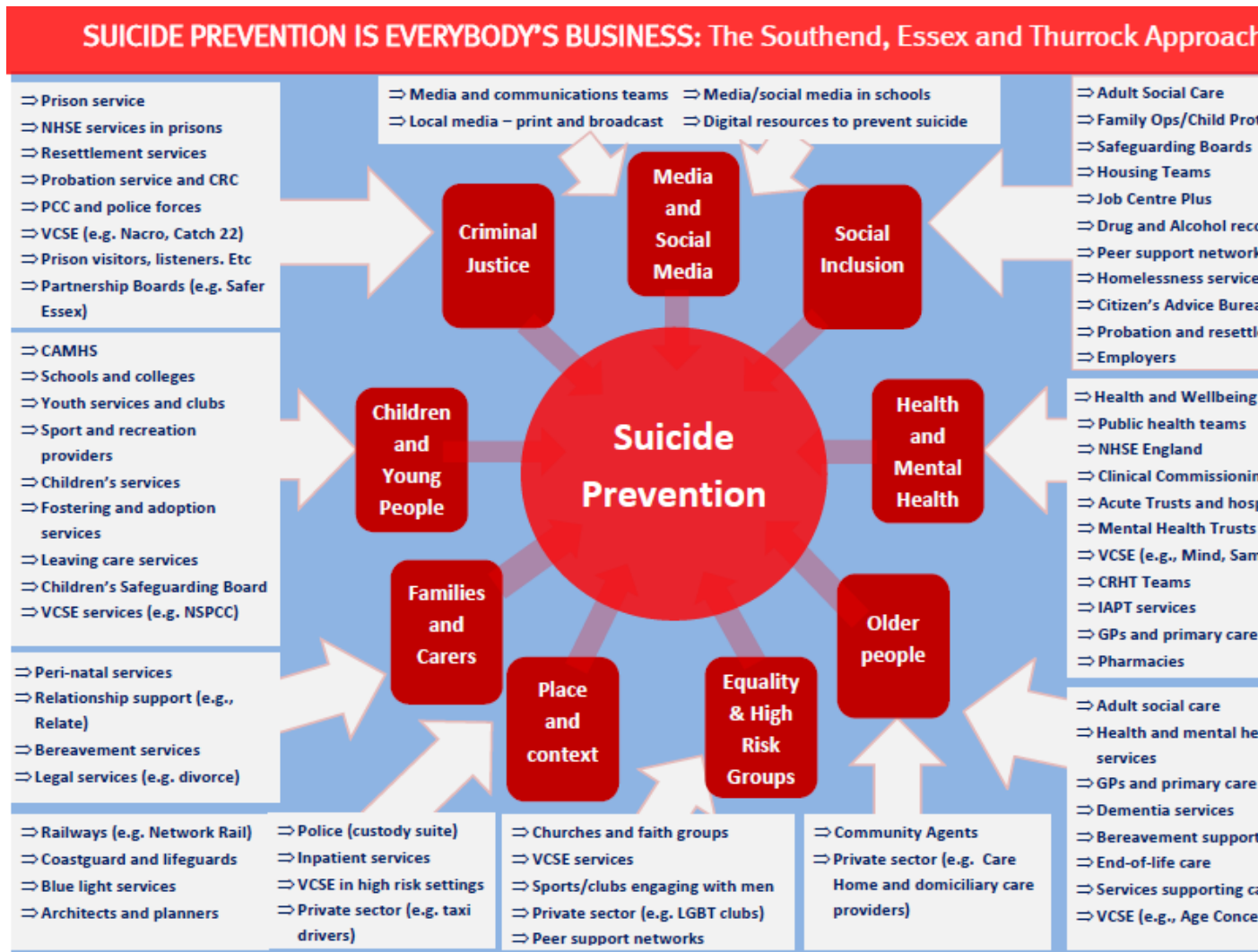
**A1.5 Note:** The suicide rates presented by *The National Confidential Inquiry into Suicide and Homicide by People with Mental Illness* (2015) (also used in this report) differ slightly from the ONS data.

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<sup>4</sup> Samaritans 2015; DH 2015

<sup>5</sup> Some graphs, from sources other than ONS adopt different criteria (this is specified, where relevant).

## Appendix 2: Suicide prevention is everybody's business



# Southend-on-Sea Borough Council

Agenda  
Item No.

Report of the Deputy Chief Executive  
(Place)

To

Cabinet

On

19<sup>th</sup> September

Report prepared by: Chris Burr, Economic Growth Group  
Manager

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## Towards a Skills and Labour Market Strategy for Southend-on-Sea - Consultation Paper

Executive Councillor: Councillor Ann Holland  
Part 1 (Public Agenda Item)

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### 1. Purpose of Report

- 1.1 To update Cabinet on the development of a Skills and Labour Market Strategy for Southend-on-Sea 2018-22.
- 1.2 To seek Cabinet's endorsement of the draft '*Towards a Skills and Labour Market Strategy for Southend-on-Sea Consultation Paper – October 2017*' to be considered at September Cabinet for approval, ready for a wider consultation process.

### 2. Recommendation:

**That the draft '*Towards a Skills and Labour Market Strategy for Southend-on-Sea Consultation Paper – October 2017*', is endorsed to be considered at Cabinet on 19<sup>th</sup> September 2017.**

### 3. Background

- 3.1 In November 2013, Cabinet agreed the 'The Need for a Southend Skills Strategy' report [Item 437]. This identified the absence of a shared skills strategy which unites all stakeholders in a joint vision and understanding of the current position, future opportunities and how those might be maximised for the benefit of the individual, the business, and the town; and the resulting need for a Southend Skills Strategy to co-ordinate an approach to tackling these significant issues.
- 3.2 Officers from the Economic Growth Group and Learning Directorate have been working together to develop a framework for a Skills and Labour Market Strategy for the borough. The proposed strategy will aim to develop a cohesive and borough-wide approach to skills development.
- 3.3 An initial scoping paper went to pre-Cabinet Scrutiny in October 2016 and the discussion and feedback used to inform this next stage of work.

3.4 The strategy will be produced as part of a refreshed approach to shape the development of Southend as a place. The new documents, which together contribute to this approach, include:

- Southend-on-Sea Borough Council Digital Strategy 2017-20
- Southend-on-Sea Borough Council Economic Growth Strategy 2017-22
- Southend-on-Sea Borough Council Tourism Strategy and Destination Plan 2017-27

Each of these strategies addresses a specific theme, critical to the effective development of the borough during the next ten years. The strategies are designed to be specific and separate but strongly interlinked so as to ensure that the delivery of individual projects can constitute more than the sum of its parts and maximise contribution to the creation of a better Southend.

3.5 It is timely for the Council to now produce a skills strategy that builds upon existing evidence and clearly articulates Southend's interests in its wider economic context. The South East Local Enterprise Partnership (SELEP) has recently commenced work on a new skills strategy for the LEP area as well as a new Strategic Economic Plan. The Growth Strategy adopted by Opportunity South Essex in 2016 also identifies skills as one of its priority areas.

#### **4. Method**

- 4.1 An evidence base covering a wide range of relevant data sources and metrics has been compiled and summarised in order to inform the strategy (background paper).
- 4.2 A two-stage consultation process has been implemented to maximise collective buy-in from stakeholders; intended to result in a 'borough-wide skills strategy'.
- Stage one of the process has already taken place via the range of workshops and interviews. This has included officers from all Council departments, Councillors, school representatives and a range of businesses. The feedback received through this consultation, in addition to that arising from pre-Cabinet scrutiny, has been considered in the development of the Consultation Paper.
  - Stage two of the process will see the circulation of a Consultation Paper (attached at Appendix 1) to the wide range of stakeholders identified within the skills stakeholder mapping exercise. Consultees will be asked to answer eleven key questions. Consultation responses will enable us to further distil the current work into a single, succinct skills strategy that is supported by stakeholders from across the borough.
- 4.3 The final strategy will detail a range of objectives, with priorities, rationale, and delivery ideas. These will be designed to assist in closing skills gaps, addressing issues, improving the skills system and maximising benefit to borough residents.

#### **5. Consultation Paper Overview – Key Features**

5.1 The Consultation Paper has been written as a document for discussion – not a final strategy. It provides a summary of the evidence base, discussion of key issues and suggests some priorities to steer future activities. These sections are designed to show the relevant socio-economic context and the key factors relating to the demand and supply of labour and skills in Southend.



The Consultation Paper then goes on to set out five key 'Ambitions' with relevant objectives, rationale, and delivery ideas.

5.2 The key 'ambitions' identified in the document are:

- 5.2.1 **Leadership** - This ambition sets out the need for strong collective leadership within the skills provision sector. It also highlights the role that the Council can play in influencing and enabling a progressive labour market. This includes influencing, delivery, enabling and advocacy roles that could be performed by the Council and other relevant stakeholders.
- 5.2.2 **Life Transitions** - This ambition focuses on key resident life transition points. These transition points are important junctures in an individual's life that warrant additional skills support. They include: early years (0-4), transition to high school and subject choice, transition from school to work, university to work, becoming a parent, redundancy/career change and up-skilling of existing employees. The Consultation Paper proposes that using these points, and a focus on the most deprived neighbourhoods and families, to inform a delivery framework will maximise positive impact for residents and the local labour market.
- 5.2.3 **Agility in provision** - This ambition focusses on the future skills needs of our businesses and residents. The Consultation Paper suggests strengthening the provision of 'millennial' skills, including communications, technical, digital literacy and entrepreneurial skills – to maximise the mobility of labour (and subsequent resilience of the local economy) and prepare for the future, unrealised skills needs of employers.
- 5.2.4 **Skills Charter and Virtual Academy for Skills and Employment (VASE)** - This ambition focuses on: (a) encouraging a commitment from all stakeholders via a 'skills charter'; and, (b) further developing the VASE project. The skills charter will set a clear range of principles that stakeholders (council/businesses/educators/learners) will agree to adhere to. From this, gaps within the skills system can be clearly identified and addressed. The VASE project will seek to utilise and capitalise upon major regeneration projects to ensure skills benefits and employment opportunities are maximised for local residents.
- 5.2.5 **Utilising Assets and Networks** – This ambition focuses on making the most of existing 'hard assets' (schools, colleges, digital infrastructure) and 'soft assets' (people, sectoral specialisms, cultural heritage, industry links, networks) in order to catalyse further improvement in the skills system. Opportunities around digital technologies are particularly highlighted here.
- 5.3 Recognising the unprecedented nature of changes that have occurred in the global economy during the last 10 years and that this change brings both opportunities and challenges, the strategy will seek to create a system with the requisite agility and resilience to maximise benefit for residents over the long-term. The final strategy will also set out a decision making framework that can be utilised to inform decision making when external changes necessitate deviation from the strategy.

## **6. Next Steps**

- 6.1 The consultation is proposed to commence at the start of October following this Cabinet cycle, and consultees will be asked to provide comment by the end of December.
- 6.2 A concise strategy document will be produced detailing the evidence, ambitions and actions relevant to the stakeholders with the drafting of the final strategy taking place in January 2018. This will be brought back to Cabinet in March 2018 for consideration prior to adoption.

## **7. Other options**

- 7.1 Option 1 - Do nothing. Decide not to pursue the development of a Skills and Labour Market Strategy and allow the market to continue as it is. The result of this would be an absence of community leadership on the subject and a lack of response to the issues identified in the first stage consultation and assessment.
- 7.2 Option 2 - Seek further development or changes to the Consultation Paper prior to agreement and circulation. This is possible but would have an impact on timescales for delivery of the strategy and resulting implementation.
- 7.3 Option 3 - Move straight to development of the strategy document without further consultation. As skills and labour market development cannot be addressed solely by the Council but is, instead, a cross-cutting issue the creation of a final strategy that fosters buy-in from a wide range of stakeholders is integral. Not doing so would risk disengagement from partners and carry risks in regards to consultation best practise. Therefore wider consultation to capture the breadth of issues to be addressed and support to do so is the recommended approach.

## **8. Reasons for Recommendation**

- 8.1 The strategy aims to improve the Southend skills support landscape, raise ambition and skills levels, increase employment opportunities in local jobs and enable economic growth through equipping residents with the skills needed by business. A clear strategy for the Council and its stakeholders will play an integral role in maximising the benefit realised by local residents facilitating economic growth.

## **9. Corporate Implications**

- 9.1 Contribution to Council's Vision and Corporate Priorities

Ensuring that residents are inspired and able to access training and education so as to secure meaningful and satisfying employment with the opportunity to progress, whilst also ensuring that the skills and training provision meets the needs of local businesses so as to appropriately equip the workforce, assists all objectives to lead towards a Safe, Clean, Healthy and Prosperous and Excellent Southend. In particular, the strategy will contribute to the aim of creating a "Prosperous" Southend.

## 9.2 Financial Implications

There are no immediate financial implications associated with circulating the Consultation Paper and progressing a skills strategy for the Borough. Enacting and implementing the strategy may have some budgetary impacts for a number of teams and budgets across the Council. Any costs will need to be approached on a case-by-case basis, in accordance with existing Council budgetary and expenditure protocols.

## 9.3 Legal Implications

We have taken advice on from the Communications Team to ensure that the Consultation Paper is based on good practice and does not conflict with Cabinet Office Principles or the 'duty to consult'.

## 9.4 People Implications

Officers from the Economic Growth Group and Learning Directorate will be responsible for undertaking and managing the consultation process. This will not require any additional resource.

## 9.5 Property Implications

There are no property implications associated with the Consultation Paper or process.

## 9.6 Consultation

A range of stakeholders, as set out in paragraph 4.2, have been consulted as part of the first stage. Through the second stage of consultation a wider base of stakeholders can be engaged to inform the strategy development and secure support for it.

## 9.7 Equalities and Diversity Implications

An Equalities Impact Assessment will be undertaken prior to the consideration of a full Skills Strategy by Cabinet in March 2018.

## 9.8 Risk Assessment

The principal risks associated with the Consultation Paper are reputational damage and policy conflict with external organisations. In order to mitigate this risk, the consultation process has been designed to take account of wider stakeholder views and include stakeholder feedback within the published Consultation Paper.

## 9.9 Value for Money

The consultation process for the Skills Strategy will be undertaken at minimal cost, utilising electronic means wherever possible. The activity will be covered within the existing budget of the Economic Growth Group.

#### 9.10 Community Safety

There are no Community Safety implications associated with the consultation and production of a Skills Strategy for the borough.

#### 9.11 Environmental Impact

There are no Environmental Impact implications associated with the production of a Skills Strategy for the borough.

### **10. Appendices**

- 10.1 Draft Paper – “Ambition Southend: Towards a Skills and Labour Market Strategy for Southend-on-Sea, Consultation Paper October 2017”

### **11. Background Papers**

- 11.1 Skills and Labour Market Review for Southend-on-Sea, April 2017

# Ambition Southend

Towards a Skills  
and Labour Market  
Strategy for  
Southend-on-Sea

Consultation Paper  
October 2017



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# About this paper

This paper is the product of a project to develop a Skills Strategy for the borough. Its aim is to enable an efficient, effective labour market with clear, accessible career pathways for residents, which is able to respond to emerging economic risks and opportunities.

The paper seeks to analyse and draw together key findings from the research to identify key priorities to improve the local skills system.

The paper has been informed by findings from an evidence review and series of initial consultation meetings. It forms an important part of the ongoing consultation process.

## Using the latest evidence

This report, and the evidence base that underpins it, uses the latest available evidence from sources such as: the Office for National Statistics, the Department for Education and the UK Commission for Employment and Skills. Recent updates to key national datasets and time series data have been incorporated so figures and trends quoted are in line with those in other Council strategies.

## Next steps

This paper provides some initial analysis, conclusions, proposals and questions for your consideration and feedback.

**We are seeking your written response to the questions included in the paper by Friday, 22nd December, 2017. These should be emailed to: [economicd@southend.gov.uk](mailto:economicd@southend.gov.uk)**

Once consultation feedback has been gathered, it will be used to produce a final strategy. We aim to publish this in early 2018.

The strategy aims to bring together the multitude of stakeholders across the borough and, critically, to generate a shared vision and agreed approach to improving the current position.



# The current skills support landscape

The skills and labour market support system is well developed in Southend-on-Sea. The key institutions and partnerships are illustrated in the diagram below. These include: primary, junior and secondary schools, FE colleges, universities, the South East LEP, the

Opportunity South Essex (OSE) Partnership and the Southend Business Partnership (SBP). Although not individually listed, many local businesses are also important providers of skills development activity in the borough.



# Strengths

The following highlights some of the key strengths of the borough in relation to skills and the work force:

## High economic participation

In 2016, 81.2% of Southend working age residents were either in employment or actively seeking work – above the England average of 78.1%.

## A growing workforce

**Southend-on-Sea workforce has grown over the past decade.** The borough's working-age, resident population (and potential local workforce) grew by 12,300 (or 12.5%) between 2005 and 2015, to reach 110,400 in 2015. This was slightly below the England average growth rate of 13.2%.

**The workforce is forecast to continue to grow** by 4.8% over the decade from 2015 to 2025; and by 2.5% over the following decade, from 2025 to 2035.

## Increasing workplace earnings

**Gross hourly earnings for full-time workers with jobs based in Southend** were £12.56 in 2016; and grew by 8.3% between 2010 and 2016, compared to 7.8% average for England.

**Residents' earnings are high and have grown at a rate over twice the national average.** Southend-on-Sea's average resident-based earnings, including local workers and commuters, were £14.75 an hour in 2016 - significantly higher than the England average of £13.80. Southend-on-Sea has experienced a high rate of growth in resident earnings – with 16.6% growth since 2011, compared to a national average of 7.8%. This is, in part, due to the proximity of the borough to London and

higher average earnings in the capital.

## Strong average school performance

**Southend-on-Sea performs highly in qualifications attainment.** In 2015/16, 61% of 19 year-olds resident in Southend-on-Sea gained a Level 3 qualification (A-level or equivalent). This was higher than the England average of 57% and higher than other neighbouring education authorities.

**In 2015/16, 65% of pupils in Southend-on-Sea gained at least 5 A\*-C GCSEs including English and maths.** This was a higher rate of attainment than the England average (54%) and again, it out-performed neighbouring education authorities. However, it is important to note that there is a wide variation in individual school performance.

## Good local FE and HE provision

South Essex College and the University of Essex are well regarded by stakeholders, and have a presence in the borough.

Q1

Should we consider other strengths?  
If so, which ones?

# Weaknesses

## The following details some of the key weaknesses of the borough in relation to skills and the workforce:

### Low and declining productivity

**Economic output per head is lower than the UK average and other neighbouring authorities.** Southend-on-Sea's average £17,500 of Gross Value Added (GVA) per person is below the UK average of £25,600; below Thurrock (£19,800) and below Essex (£21,300). This is also reflected in productivity rates, with Southend-on-Sea achieving £28 in GVA per hour worked in 2015; compared with the national average of £32 per hour worked.

### Low jobs growth

**There has been little overall jobs growth in Southend-on-Sea over the past decade.** There were 76,000 workforce jobs in Southend in 2015. This total has changed little over the decade (+3000 since 2009). The borough has only just recovered from the jobs lost during the 2009 recession. Other nearby authority areas, Dartford (+21.1%) and Thurrock (+10.8%) have experienced much stronger growth since 2010.

### Recruitment difficulties and skills gaps

**A higher share of employers in Southend-on-Sea reported that their vacancies were hard to fill,** compared to the national average. In 2015, 54% of all establishments in Southend reported that they had at least one vacancy that was 'hard to fill'. This is higher than the England average of 39%.

**Low numbers of applicants were the main reason for hard-to-fill vacancies (HTFVs).** In 2015, 39% of all employers with HTFVs claimed

that there were low numbers of applicants with the required skills (slightly higher than the England average of 37%). Additionally, 24% stated that there were not enough people interested in doing this type of job, higher than the England average of 20%. The majority of establishments with HTFVs reported that these had a negative impact on their business, resulting in increased workloads for existing staff, difficulties meeting quality standards, higher operating costs, and losing business or orders to competitors.

**Skills gaps exist in the current workforce and are slightly more prevalent in Southend-on-Sea than across England.** In 2015, 6% of staff in Southend-on-Sea were not fully qualified to undertake their current job, slightly higher than the England average of 5%. This was largely due to the significantly high proportion of staff undertaking elementary occupations<sup>1</sup> exhibiting skills gaps - 2.4%, compared to just 1.0% across England.

### A net exporter of skills

**The number of residents qualified to NVQ Level 4 or above is higher than the number of workers with jobs in Southend-on-Sea.** In addition, the resident population has a greater average level of educational attainment than the workforce population, suggesting that Southend-on-Sea is a net exporter of skills in labour market terms.

<sup>1</sup> Elementary occupations consist of simple and routine tasks which mainly require the use of hand held tools and often some physical effort. International Labour Organisation, 2013

## Less well qualified workforce

**Workforce qualifications attainment in Southend-on-Sea is below the national average.** In 2016, 26.0% of working-age residents in Southend-on-Sea were qualified to NVQ level 4 or above. This is below the national average of 36.8%. 64.9% of working-age residents were qualified to at least NVQ level 2 – again, lower than the national average of 73.4%.

## Attainment disparities between schools and neighbourhoods

**There is a significant variation in GCSE attainment between Southend-on-Sea schools.** The percentage of Southend-on-Sea pupils achieving 5+ A\*-C or equivalent, including A\*-C in both English and Mathematics GCSEs, ranges from 100% in the highest achieving school, to 23% in the lowest.

**Deprivation is, in part, linked to education and skills.** According to the 2015 Index of Multiple Deprivation, Southend-on-Sea had 13 out of 107 lower super output areas (LSOAs) that were among the top 10% of the most deprived LSOAs in England. Engagement in education and skills development in these areas are typically low.

## Youth unemployment

**Youth unemployment is slightly higher in Southend-on-Sea than the national average.** 23.4% of those claiming unemployment benefits were aged 16 to 24, in Southend-on-Sea, compared to 20.7% in England.

**Unemployment in Southend-on-Sea is slightly above the national average.** Unemployment in Southend-on-Sea has been slightly above the national average since 2009. The borough's unemployment rate is 6.1%, compared to 5.1% nationally, and is similar to the rate of Basildon (5.9%), Castle Point (6.0%), and Thurrock (5.8%).

## Q2

Should we consider other weaknesses?  
If so, which ones?

# Challenges

## Confusion over apprenticeships

**Stakeholders report confusion amongst employers over the new apprenticeship arrangements.** Employers consulted were critical of the specificity of new apprenticeship standards, and questioned the relevance of provision to their industry and how the new system would work in practice.

## Funding for schools

**There is concern that the new national funding formula for schools will have a significantly damaging effect on education provision in the borough.** Recent analysis of the funding formula projections identifies a significant variation in impacts between Southend-on-Sea schools, with the worst affected secondary school losing £190 per pupil and the least affected losing £97.

## Identifying pathways for all learners

**Pathways for more vocational careers are less well developed than traditional, academically supported career pathways.** The career pathways for individuals with high academic achievement (school-college-university-workplace) are often far better developed, promoted and catered for within the curriculum than more vocational career pathways (school-apprenticeship-workplace).

## Education policy focuses on qualifications attainment

**Current education policy is driven by qualifications attainment and OFSTED targets.** Stakeholders believe that current education policy, funding and performance

targets do not cater for the needs of many school leavers, who do not follow a traditional academically supported career pathway.

## Lack of resource for building industry awareness and ambition in school-age children

**Stakeholders report a lack of resource (but not will) to introduce school-age learners to industry.** It is recognised that, due to existing education policy, industry related-activities are often a low priority for school effort and funds.

## Meeting future skills needs

**There is a need to invest in the development of millennial skills in order to future-proof the labour supply.** Young people today will need a wide range of highly transferable skills in order to succeed in careers that are taking an increasingly non-linear path. Often termed 'millennial skills', these include: communications, digital literacy and entrepreneurial skills. Additional resources and efforts to develop these skills among our future workforce would maximise the mobility of labour required to meet the workforce requirements of future industry.

**Enterprise skills are increasingly important in the workplace.** Micro and small businesses now constitute over 86% of the Southend-on-Sea economy. Increasingly, young people are being required to become self-employed or self-reliant in the workplace. Enterprise skills provide initial guidance on starting out and succeeding in setting up a business, these skills are also transferable into employment and the workplace.

## Delivering an accessible and capable skills infrastructure

Stakeholders reported that the skills landscape is confused, constantly changing with too many separate initiatives and a lack of coordination. Stakeholders identified a need to improve clarity, coordination, and coherence of skills support provision. Some stakeholders argued that a 'one-stop-shop' or information brokerage service for skills would be helpful.

### Q3

Should we consider other challenges?  
If so, which ones?

# Opportunities

## Apprenticeship Levy

The Apprenticeship Levy is an opportunity for employers to pool resources and tailor an apprenticeship system that better responds to the needs of the local economy. The process and proposition must be relevant to Southend-on-Sea's unique economic characteristics.

There is also an opportunity to impart a range of core skills and competencies to all apprentices - such as digital, customer management, communication, literacy, numeracy, problem solving and project management – that will help us ensure that the local workforce can meet future industry skills requirements.

## Strong regeneration plans

Southend-on-Sea will be the location for some major regeneration projects during the next 15 years (Airport Business Park, Better Queensway, Thames Estuary Experience, etc.) that will generate local demand for skilled workers. A significant opportunity exists to harness the skills development capacity of these projects and ensure that local residents benefit.

## A growing skills infrastructure

Southend has been the location of a number of projects to expand skills support infrastructure in recent years (South Essex College, The Forum, Building Schools for the Future, University of Essex). There is an opportunity to build on existing progress and make Southend a hub for this type of development in future years. This would improve the borough's ability to meet future

workforce requirements and bring significant benefits to local residents.

## Strong labour demand in the future

The need to replace retiring workers will create labour demand across all types of jobs. The *Working Futures* forecast has predicted that job openings will be in a wide range of industries and occupations, particularly reflecting the need to replace retiring workers.

## A strong and willing stakeholder base

Key stakeholders are well-informed and ready to support improvement in local skills systems. Throughout the early consultation and workshops, there was a good degree of well-informed feedback and ideas for the future. There is a coalition of the willing: this is a significant local advantage.

### Q4

Should we consider other opportunities? If so, which ones?

# Main findings

This section identifies some of the key themes arising from the evidence review and initial consultation exercise, provides some further insight and identifies potential strategic objectives/outcomes.

## **Finding #1: There are multiple skills challenges facing Southend, but there are also key opportunities.**

There are multiple challenges and opportunities facing the borough. The solutions and the process of taking advantage of these will require strong leadership, effective co-ordination and joint working among stakeholders.

A key advantage for Southend-on-Sea is that it has a range of successful education and training institutions. The consultation exercise revealed that, among stakeholders, there is a broad awareness of the key challenges and potential solutions.

Shared vision and leadership, that is inclusive and builds on the commitment and knowledge already present, is clearly needed.

## **Finding #2: Driving up productivity and meeting industry's future skills requirements are key challenges for the borough.**

Raising productivity is a difficult challenge, as it involves changing the way businesses and employers operate.

A shift towards high value-added economic activities will require organisational development and investment in capital and skills. As such, the value of change must be realised by business and be in-line with market demand.

According to economic theory the following

aspects of skills formation and supply are significant factors in improving productivity:

- Improving leadership and management skills
- Addressing skills gaps that negatively impact organisational performance
- Developing skills that make the best of capital investment/new technology
- Skills planning for business growth
- Implementing improvements to HR management and in-work skills training

## **Finding #3: Southend-on-Sea has an open labour market**

Labour freely moves in, out and around the borough without regard to administrative boundaries. The wider South-Essex and London labour markets are closely linked to Southend's. A skills strategy and delivery plan must recognise the proportion of local people that work outside of the borough, and that many local employers employ staff that commute in from other boroughs.

## **Finding #4: Southend-on-Sea has significant disparity in deprivation and educational attainment**

There is a wide range of performance between schools in Southend. The percentage of pupils achieving 5+ A\*-C or equivalents including A\*-C in both English and Mathematics GCSEs – varies from 100 per cent, to 23 per cent.

Southend-on-Sea also has a wide variance



in deprivation, with some impoverished ward areas scoring highly on the Indices of Multiple Deprivation (Milton, Victoria, Kursaal). Other ward areas have low levels of deprivation and high average earnings (Leigh, Leigh West, Thorpe).

### **Finding #5: There is a common ‘millennial’ skillset needed by young people**

The ‘millennial’ skills challenge means that high levels of technical skills, soft skills, communication skills, project management and entrepreneurial skills need to be developed by young people in order to equip them for a lifetime of work and learning.

These skills will be integral to the ability of local employers to continue to trade profitably in the future. According to local employers, it is important to have a workforce who possess positive attitudes to work; as well as technical and professional expertise.

### **Finding #6: Meeting the millennial skills need and changing employer requirements, requires an agile skills infrastructure**

Creating a system that can consistently adapt to the skills needs of local employers is a significant challenge for Southend. Accordingly, it is important for employers to be part of the infrastructure that supports skills development. There also needs to be a productive and open dialogue with the many education providers in the town. Employers can also collaborate to achieve critical levels of demand for specialist skills, attracting training provision to the locality, or saving costs on off-site training.

With a national economy facing unprecedented change, it is difficult to predict specialist skills needs in 10 years’ time. Accordingly, it is important to focus efforts on encouraging the right attitudes and foundations (millennial skills as described above) – and to enable an agile response by skills support providers, including

both employers and public sector organisations. This should create the right foundations and core skills, along with a responsive, tailored, and effective skills infrastructure for specialist needs.

### **Finding #7: Current promotion of work skills and career resilience in young people is patchy and not sufficiently resourced**

Although there are a number of very good initiatives that bring employers into contact with primary and secondary schools and their pupils, there is no cohesive approach to building resilience in young people for their future career choices and pathways. Southend-on-Sea’s schools are becoming increasingly independent in terms of their management, finance and operations. This introduces new challenges in terms of aligning school education with the needs of the local economy.

### **Finding #8: There will be opportunities stemming from the major regeneration projects scheduled to take place in the borough over the next 15 years**

There is an estimated £1 billion of construction expenditure due to take place in Southend-On-Sea over the next 15 years.

Accordingly, there will be a significant number of construction jobs generated, as well as jobs connected to the new buildings and their final use.

### **Finding #9: Southend on Sea’s transport infrastructure links are critical in enabling businesses access to local and national labour markets.**

Southend’s international airport, nine rail stations and key arterial highways play a vital role in bringing workers in, and enabling commuters to work outside the borough. Protecting and developing these links is crucial to maintain a productive local workforce and to continue to generate wealth for local residents.

# Objectives and Outcomes

Before discussing the conclusions from the Review section of this document, it is important to acknowledge that the purpose of an efficient and effective labour market is to support Southend-on-Sea's local economy and population.

**Raised productivity** is a desirable outcome as it means that more value will be generated per unit of labour used in the local economy, which in turn will lead to increased organisational efficiency, higher levels of employment and increased average salaries. There is a direct link between higher productivity and higher salaries. Highly productive jobs add more value and tend to be internationally tradable, more resilient and adaptable to change.

**Jobs growth** is a desirable outcome in Southend-on-Sea, as the rate of jobs growth has been relatively low in recent years. In the context of a growing local population and local workforce it is important to create jobs to maintain employment levels and continue to generate wealth locally.

**Meet the current and future skills needs of employers.** For local employers to operate efficiently and successfully they need an adequate supply of labour with the right skills. Talent and skills are two of the main 'attractors'

for businesses seeking to invest in the area. It is also important to continue to provide local employment opportunities to residents.

**Increasing the skills attainment and wages of the lowest earners** is another desirable outcome. Improving attainment helps the economy by developing a more productive workforce. It helps individuals by developing their transferable skills, increases household income and reduces the number of hard-to-fill vacancies.

**An inclusive workforce** helps to build a healthy, sustainable community. Skills improvement can bring those at disadvantage or risk of unemployment nearer to the active labour market. This helps to reduce the spatial concentration of disadvantage and poverty.

## Q5

Are these the right outcomes to aim for?  
How would you adapt or add to these?

Desired outcomes from an effective skills and labour system and market

Raised productivity

Jobs growth

Meet the current and future skills needs of employers

Increase skills attainment and wages of lowest earners

An inclusive workforce

# Developing a strategy

The next step is to take these findings, and organize them into a coherent strategic response. The following chapter describes a response based on five key areas of focus. They are:

- 1. Leadership**
- 2. Life transitions**
- 3. Agility in provision**
- 4. Skills charter and a virtual academy for skills and employment**
- 5. Utilisation of assets and networks**

In order to provide greater definition and illustrate the potential of these areas of focus, we have provided some possible delivery ideas to support the implementation of a skills strategy. These are detailed at the end of each section. The ideas proposed are not fixed or prescribed to any particular stakeholder. They are designed to start a dialogue and we would welcome your feedback on these ideas.

## Q6

Are these the right areas of focus?

How would you adapt or add to these?

# Ambition Southend: (A) Leadership

## STRATEGIC OBJECTIVES:

### 1) Create a shared vision and convene effective leadership in skills

Convening effective leadership from stakeholders across the borough is particularly important when seeking change in employer practices and lobbying for resources/powers from central government.

The principal functions for leadership in skills are to:

- Set out a shared vision for skills and communicate it simply and effectively
- Convene the borough's business and community leaders to champion the skills strategy, provide advocacy for skills development and influence other institutions and employers
- Encourage leadership and commitment from all stakeholders (this could form the basis of a 'skills pledge' tailored to different stakeholders)
- Engage employers in relevant skills issues
- Create and implement a delivery plan for a Skills Strategy, detailing the roles and responsibilities of the Council, employers, education institutions, local communities and individuals.

There are also a range of further actions which may bring additional benefits in this area:

- Develop positive, forward-looking messages about the local economy
- Highlight and communicate future local labour market needs and opportunities
- Provide a coherent information portal for skills and careers

- Offer tailored information for employers, parents, and individuals
- Be clear and open about the challenges in terms of deprived neighbourhoods. Publish neighbourhood action plans
- Set out and negotiate skills pledges for various constituencies.

### 2) Articulate the changing role of the Council from direct delivery to leadership and influence

It's important to recognise that, with declining council resources, there should be an emphasis on sustainable solutions that encourage self-help and which enable people and employers to help themselves.

Part of this role could be advocacy and coordination. Some stakeholders suggested a lead body or one-stop-shop that could broker solutions for skills.

## RATIONALE:

**There are many skills issues and challenges, and many institutions, employers and organisations. Progress can only be made through collaboration**

Making progress on skills and forging effective working relationships between stakeholders, employers, education and training providers, and residents is a significant challenge.

Leadership and engagement needs to be owned across public and private sector partners. Business leaders and skills exemplars can be champions for the agenda, and should be used to lobby other businesses and government for investment and change.

## The economy is diverse, with mostly small businesses as well as some large corporates

For example, Southend-on-Sea has a relative advantage in high-tech sectors such as aviation and engineering, cultural and creative industries, specialist manufacturing and specialist construction. Micro-businesses employing between one and four staff dominate the local economy.

Marshaling these industries and employers to create a coherent and integrated approach to skills will require cogent leadership.

It was suggested that perhaps the borough would benefit from better ambassadorial promotion in order to engage internal and external stakeholders productively in skills issues.

## The perception exists that the skills landscape is cluttered and uncoordinated

There were perceptions that there are a lot of skills initiatives, clutter and constant change.

There is scope for improving clarity, coordination and coherence of skills support.

Some consultees felt that a one-stop-shop or information brokerage service for skills would be helpful.

There was reported confusion amongst employers in terms of the new apprenticeship levy:

- Employers consulted were critical of the specificity of new apprenticeship standards and the practical implications of the new system
- There is a requirement for a mechanism for building clarity and awareness for employers on the Apprenticeship Levy scheme.

## There is the perception that the public sector has a wider role to play

Public sector bodies (the Council, Hospital, HMRC, etc.) spend significant amounts on providing services in the borough. These organisations should be encouraged to utilise their purchasing power to support skills development in the local population.

## DELIVERY IDEAS:

- Create a skills leadership group from the education, private and public sectors to champion skills development
- Engage with local businesses on their specific labour market priorities
- Drive a consistent message across local partners of the labour market requirements for employers and development opportunities.
- Increase awareness of skills development opportunities for employees and residents
- Council to highlight its own (and wider public sector) role in employment, training and skills development
- Develop an initiative to use the voluntary and social sectors as a means of providing work experience for young people
- Act as a navigator to local businesses and people to reduce confusion on skills and employment issues Identify key employment and skills gaps in the labour market and invite responses from the provider network

### Q7

**Leadership – Are these the right objectives and delivery ideas?  
How would you adapt or add to these?**

# Ambition Southend: (B) Life transitions

## STRATEGIC OBJECTIVES:

### 1) Develop a 'life transitions approach' to supporting skills

Develop an action plan that seeks to intervene at crucial points of life transition for local residents, covering the following stages:

- Early years (0-4)
- Transition to high school and subject/option choice
- The transition from school to work
- Work-experience part-time work/volunteer opportunities from 14+
- University to work
- Parents - new parents, returners/role as influencers
- Redundancy/career change
- Up-skilling of existing employees, especially those with low wage, low productivity positions

This approach would involve establishing some key resources and initiatives for each stage.

### 2) Focus on priority neighbourhoods and families

It was widely reported in consultations and workshops that skills and labour market disadvantage was spatially concentrated. In addition, it was also recognised that there were families with multi-generational unemployment and low aspirations.

The wards with the highest levels of deprivation are located within the east of the borough with Kursaal, Victoria and Milton being ranked the highest on the IMD (2010). 1 in 4 children live in poverty in these wards, compared with 1 in 5 across England.

Further, it is recognised that more can be done to better support vulnerable learners and those not in employment, education or training (NEETs). Developing a collective approach that seeks to attract external funding and investment in order to replicate the best of national projects targeting the issues associated with these learners would be beneficial. National funds such as European Social Fund, and likely successors, may offer a productive source of funding to trial and develop initiatives in this area.

## RATIONALE:

### A life transitions approach builds on the key intervention activities currently delivered by the Council and other key stakeholders.

The approach taken by the Council and other stakeholders and institutions fits well with a life transitions approach, as many existing activities are targeted at these specific transitional stages. This also seemed to be a consistent theme throughout the consultation and workshop discussions.

According to consultees, and reflecting practice elsewhere over the past 30 years, there are several core skills for employability and career progression:

- Work readiness
- Attitudinal qualities and motivation
- Presentation and communication skills
- Self-reliance and problem solving
- Practical business and office IT skills

Many consultees regarded the transition from school and college to the world of work as a huge step and one in which intervention and support are required.

Further, with growing frequency, market forces will necessitate changes of job – with additional support required for those leaving/re-joining specific workforces.

Several employers who were consulted were critical of young people’s attitude to work and soft, or core skills such as time keeping and communications.

Primary school engagement with careers, work and employers was thought to be important. It was noted that the 60-Minute Mentor programme was well-received and had started to operate in some primary schools in the borough.

### **Parent workers and returners to work are an important resource**

Returners to work can offer useful flexibility to employers that are not seeking to employ a full-time member of staff. Many of the town’s employers in retail, banking and the care sector already recognise the important contribution of returners, but more can be done to communicate the benefits of this type of employment.

New 30-hour childcare provision for working parents will further support parents back into work and increase flexibility of the workforce.

### **Consultees reported that direct intervention with neighbourhoods and families was needed**

The influence of parents and guardians was also cited as being critical in school performance and career choice.

It was identified that direct intervention to engage disenfranchised families and communities would be beneficial; such as targeted counseling or support to enter the workforce. Community-based initiatives often work best with these groups.

The A Better Start Southend Work Skills Project has made some inroads in this area and is a model that could be expanded to increase the

scale and volume of support.

## **DELIVERY IDEAS:**

- Emphasise key role of attitudes, core skills and relevant vocational training in securing initial employment
- ‘Aspiration days’ and coaching in schools to highlight industry opportunities and career pathways
- Develop flexible careers information to provide residents with the skills to help them navigate the labour market themselves, now and in the future
- Re-build connections to employment networks in deprived areas through employer engagement programmes
- Promote the importance of maths and English to parents, new parents and those furthest from the labour market
- Shift in focus to highlight ‘blue chip’ employers’ use of apprenticeships to access high-demand technical professional roles
- Using new technologies to identify, understand and exploit labour market opportunities
- Develop apprenticeship routes to qualifications from 16 years
- Facilitating and encouraging part-time work alongside studying, to build experience

## **Q8**

**Life transitions – Are these the right objectives and delivery ideas?  
How would you adapt or add to these?**

# Ambition Southend: (C) Agility in provision

## STRATEGIC OBJECTIVES:

### 1) Build aspiration, informed decision-making and work readiness among young people

It is felt that a significant number of young people lack aspiration and ambition, and do not have sufficient knowledge or familiarity with the world of work.

There is a need to provide pathways for all school pupils into suitable qualifications choice, careers choice, and training or job entry. In particular, this is needed for pupils in the most deprived areas who do not have access to a range of positive role models.

There needs to be a much stronger connection between the education system, pupils and the world of work. Careers education and guidance are not a significant priority in national education policy and resources to support careers guidance are pressured. New, flexible methods of providing this information should be piloted and, if successful, mainstreamed.

### 2) Develop enterprise skills

Micro and small businesses now dominate the Southend-on-Sea economy. Increasingly young people are required to become self-employed or self-reliant in the workplace. Enterprise skills obviously provide initial guidance on starting out and succeeding in setting up a business, but these skills are also transferable into a job and the workplace.

Enterprise skills also have a good tie-in to the transition to work; for example, managing your digital presence, knowing how to present yourself, doing market research and communication and client/customer-facing skills.

### 3) Develop “millennial skills” future-proofing skills and labour market provision

Young people today need a different range of core skills to succeed in their lifetime careers, which embrace communications, technical, digital literacy and entrepreneurial skills.

Increasingly, jobs require workers to have good technical skills and the ability to apply them across a range of industries, technologies, services and contexts. Therefore, communication skills, ICT and digital skills, and project management skills come to the fore in terms of employer requirements.

Some employers also need to improve their HR planning, recruitment and personnel training practices in order to remain competitive in their marketplace. These have been termed “millennial skills” among stakeholders in Southend-On-Sea. These skills, and the challenges facing employers, require a responsive education and training infrastructure and an understanding of the employer-base.

## RATIONALE:

### Current education policy results in an under-provision of vocational career pathways

There are a number of strong disincentives that discourage provision of vocational qualifications, careers advice and guidance, and personal development in school education. The current national curriculum and OFSTED performance criteria incentivise academic qualifications and attainment over other positive outcomes such as apprenticeship or job entry, which may better



suit certain pupils. Careers services are now an optional service to be organised and funded by individual schools. Pressures on education budgets, combined with the national curriculum, can mean there is little flexibility over educational provision. Also, with the focus on testing and qualifications results, schools can lack the resources or time to engage better with employers.

### **Current education policy and funding criteria lead to a lack of provision for pupils who do not wish to enter university**

Clearly, for a significant proportion of young people, apprenticeships and job entry post-16 are valid progression routes, and university is not a suitable option. Yet the education system currently does not provide sufficient support or positive outcomes for these pupils. There is a common opinion among all stakeholders in Southend that renewed effort on guidance, personal development, careers advice and work experience in schools is warranted. This will need a high-profile initiative with strong leadership across all stakeholders.

### **There are some successful initiatives operating in the borough on which to build**

Whilst the existing Connexions service and initiatives that involve employers and work experience were widely praised by stakeholders, it was acknowledged that more needs to be done. There is also some good work experience provision, but overall there is a critical lack of places, particularly as it is now mandatory for FE colleges to offer all students work experience placements.

### **The capacity of education and training provision will need to be increased to deal with future skills requirements in the borough**

There are a number of critical future skills requirements, including: construction projects, (e.g. Airport Business Park Southend, Better Queensway, etc.), increasing social care requirements, digitalization and technological advances. Currently, government funding is too rigid and does not enable providers to be agile in meeting these future requirements.

The inflexibility of central government controlled skills funding is also a challenge

There is also the challenge of fitting nationally-funded training schemes to local employer needs. An example was given of social care apprenticeship standards not being fit for purpose, and the challenge of finding sufficient construction trainers that will deliver what employers need.

### **The Southend-on-Sea economy is reliant on micro and small businesses**

There is a significant challenge in achieving enterprise growth and 'scaling-up' SMEs to become the large employers of the future.

Enterprise has become a significant strand of activity for FE colleges – as many young people have had to become self-employed as a means of getting their first source of work and income. There was a perceived gap in marketing skills in SMEs, particularly digital skills.

It was reported in consultations that employers don't always understand young people's skills and capabilities. There may be a tendency to write-off a lot of young people who, with the right support, could possess the right skills and talents to participate actively in the labour market.

### **Digital skills are a big opportunity**

Digital skills are a major opportunity for the borough and there are some dynamic start-ups and established businesses that would benefit from future digital transformation.

## DELIVERY IDEAS:

- Develop a guide to career pathways and transitions (such as 'career tube maps' for young people and parents)
- Entry-level 'taster' courses for skilled trades jobs supported by local employers
- A dedicated careers advice service and guaranteed work placements for those at risk of disengagement
- Develop information for workers on dealing with redundancy, career change and new qualifications requirements
- Develop local youth training and apprenticeship guarantee
- Introduce 'apprenticeship ambassadors' to promote apprenticeships to students
- Develop an employer youth skills pledge
- Measures to increase information exchange between employers and education providers
- Foresight programme to examine how the OFSTED regime and qualifications system can be adapted to better meet employer needs
- Develop an 'out of school' millennial skills programme for residents
- Employer engagement programme for schools to develop enterprise skills provision
- Engaging local recruitment agencies in the conversation around managing skills demand

## Q9

**Agility in provision – Are these the right objectives and delivery ideas?**

**How would you adapt or add to these?**

# Ambition Southend: (D) Skills charter and a virtual academy for skills and employment

## STRATEGIC OBJECTIVES:

### 1) Encourage leadership and commitment from all stakeholders via a 'Skills Charter'

This could be furthered through the creation of a 'skills and careers pledge', with pledges tailored to suit a range of stakeholders. For example:

**Southend-on-Sea Borough Council** pledges to: champion an ambitious skills strategy, provide accurate information on skills; help employers find the right training and skills for their organization and provide intensive support for deprived communities/those at the furthest distance from the labour market.

**Businesses** pledge to: work with the Council and educational institutions to predict, plan for and communicate their future workforce requirements, to train their workforce; to engage in work experience programmes with schools.

**Individuals** pledge to: write a career plan; to attend meetings on time; to demonstrate serious and meaningful communication with employers, skills providers and other staff.

### 2) Wide leadership and ownership of the Skills Charter

Activity around a skills charter is to be owned and led by a broad leadership base incorporating public, private and education sectors. These leaders will become skills champions, and be able to influence, through their own informal networks, other stakeholders to progress the skills agenda.

### 3) Continue to develop a Virtual Academy for Skills and Employment

There is an estimated £1 billion plus worth of regeneration activity planned in Southend during the next 15 years. A Virtual Academy for Skills and Employment has been initiated with the intention of identifying and facilitating a pipeline of local talent in order to meet the workforce requirements associated with future projects.

Critically, the academy facilitates a ready flow of information between the Council, Council suppliers and local education institutions.

Information gathered through the academy enables the Council to utilise its procurement practices to further support the development of local skills initiatives. Through the academy, private sector suppliers can better access a ready supply of labour to support their businesses.

Although in its infancy, the academy shows promise and has potential to be expanded across a range of projects, institutions and suppliers in the future.

## RATIONALE:

### No single organisation can tackle the borough's skills issues alone

Progressing the skills agenda requires commitment and action from all stakeholders. Where resources are limited, particularly in the public and education sectors, they must be pooled, targeted and used to lever investment and engagement from other sources.

### Setting out clear expectations in a skills charter is an effective model to achieve social and economic inclusion

Skills charters that set out a vision, expectations, behaviours and commitments, have proved successful in other localities.

It is essential that social value agreements are built into the Virtual Academy for Skills and Employment. This would mean being explicit about the links between employment, social inclusion and sustainable communities. It should also lead to the explicit aims of economic inclusion of local residents and setting expectations for local employment, training and guaranteed interview schemes.

### **Significant development projects will be delivered in the borough**

There are many multi-million pound projects planned within the borough during the next 15 years. These include: The Airport Business Park Southend, Better Queensway and the Thames Estuary Experience. These projects will lead to the creation of new jobs in a wide variety of sectors and trades.

### **Growing sectors have been identified that will have significant labour needs in the future**

Human health and social care, education, public administration, cultural and creative industries, specialist manufacturing and specialist construction are all growing industries, with significant future labour demand, due to either expansion and/or the need to replace retiring workers

More thought and action needs to be put into creating the best entry level jobs and career progression routes through and between these industries.

### **Southend-on-Sea has an open labour market and wide labour catchment area**

Evidence on commuting patterns suggests an open labour market in South Essex.

There are opportunities for job growth from

regeneration activity, and with an open labour market there is a risk that residents from outside the borough will take these jobs if local career pathways are not sufficiently developed.

To increase local wages local jobs will need to become more productive and to add more value. As discussed earlier, this will require working closely with businesses to improve their performance and business practices.

### **The Apprenticeship Levy should be explored to maximise local benefit**

The apprenticeship system should be tailored to Southend's unique situation and proposition: its sectors, employers, and regeneration opportunities.

Apprenticeship schemes shared among employers could be considered or single schemes that can combine core skills such as digital, customer management, communication, literacy, numeracy, problem solving and project management – with specific employer and industry experience.

### **DELIVERY IDEAS:**

- Establish a network of industry/sector sources to support local knowledge and sharing of future employment opportunities and career pathways
- A consistent focus on the skills that enable individuals and employers to make informed decisions and use of (digital online and social media) connections to share available knowledge
- Facilitating a wide conversation around how skills support is essential to the borough's medium and long-term success
- Further developing the Virtual Academy for Skills and Employment to support local residents to access upcoming employment opportunities.
- Supporting and promoting volunteering as a route into work

## Q10

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Skills charter and a virtual academy for skills and employment – Are these the right objectives and delivery ideas?

How would you adapt or add to these?

# Ambition Southend:

## (E) Utilisation of existing assets and networks

### STRATEGIC OBJECTIVES:

#### 1) **Lever hard assets and infrastructure**

The existing capital assets (buildings, etc.) of the local schools, the Council, local FE and HE providers are significant. These assets could be utilised to provide live skills training opportunities to local people. This is particularly important in terms of providing skills for construction, and attempting to create opportunities for local residents.

#### 2) **Lever soft assets, digital opportunities and infrastructure**

From the business networks and political relationships that already exist, to the skills, experience and networks of workers who commute to London – there are a wide range of human assets, knowledge and connections that could be deployed to improve the skills and labour market outcomes in the local economy.

A skills strategy also needs to grasp the opportunities presented by developments in digital technologies and the significant investment in broadband technology, mobile technology and ‘smart cities technologies’ that is being made in the borough.

#### 3) **Create links between industries, businesses, individuals and the existing social and economic heritage**

Southend-on-Sea has been developing a strong social and historical narrative about its role on the Thames Estuary, and as a centre for the fishing industry, visitor economy and

restaurants. The links between heritage, industries and business activities could be further exploited to provide skills development opportunities for local residents.

### RATIONALE:

#### **There are existing institutional strengths and networks**

The borough has a range of education and training institutions, employers and the local authority itself which have capacity, capability, are dynamic, and are undertaking exemplary activities. Further, the borough is developing new international links, via London Southend Airport, with locations such as Groningen, Netherlands; Faro, Portugal, and Malta.

#### **There are industry strengths, as well as niche industries**

There is a small, vibrant fishing industry, and a range of high-quality seafood restaurants/businesses in Leigh-on-Sea. Other outlets may aspire to providing high quality seafood and traditional skills within the sector could be further exploited. There is no reason why apprentices, staff training, and HR development strategies could not play a significant role in developing these businesses further (organisations such as the North Thames Fisheries Local Action Group are seeking to do just that).

#### **The borough’s heritage is also an asset to be used as part of the skills strategy**

Another example is the proposed Thames Estuary Experience development. From an economic development perspective these

are assets and relationships which could be mutually reinforcing. For example, the local heritage story could be part of customer care and tourism information training among visitor economy staff. The recent UK-wide tour of the iconic poppies installation at Barge Pier Shoeburyness, and the interaction with local schools and colleges, is a good example of this.

### **Some existing firms are exemplars in employability, work preparation and skills training**

Work readiness is a big issue with employers – and this is one of the main motivations for them to take part in skills development initiatives.

Some large employers in Southend-on-Sea provide employability training, financial capability sessions, CV training to local communities and young people for free. This could be better promoted amongst local stakeholders and employers.

There are also local networks and partnerships that could be used to progress the skills strategy, such as Southend Business Partnership.

## **DELIVERY IDEAS:**

- Convene boards and provide information targeted at utilising existing hard assets to support skills development.
- Facilitate information exchange amongst local stakeholders to improve awareness of assets/support capacity in other organisations
- Utilise existing business to business networks to raise awareness among employers and unlock local knowledge as a resource for skills development
- Targeted communication with local business partners to encourage participation in skills initiatives
- Develop training materials and marketing collateral about the heritage of Southend to be produced and made available to schools and education staff
- Developing closer links between museums, visitor attractions and local, relevant businesses.

## **Q11**

**Utilisation of existing assets and networks – Are these the right objectives and delivery ideas?**

**How would you adapt or add to these?**

# List of consultation questions

## The consultation questions posed throughout this document are:

- Consultation question 1:** Should we consider other strengths?  
If so, which ones?
- Consultation question 2:** Should we consider other weaknesses?  
If so, which ones?
- Consultation question 3:** Should we consider other challenges?  
If so, which ones?
- Consultation question 4:** Should we consider other opportunities?  
If so, which ones?
- Consultation question 5:** Are these the right outcomes to aim for?  
How would you adapt or add to these?
- Consultation question 6:** Are these the right areas of focus?  
How would you adapt or add to these?
- Consultation question 7:** Leadership – Are these the right objectives and delivery ideas?  
How would you adapt or add to these?
- Consultation question 8:** Life transitions – Are these the right objectives and delivery ideas?  
How would you adapt or add to these?
- Consultation question 9:** Agility in provision – Are these the right objectives and delivery ideas?  
How would you adapt or add to these?
- Consultation question 10:** Skills charter and a virtual academy for skills and employment –  
Are these the right objectives and delivery ideas?  
How would you adapt or add to these?
- Consultation question 11:** Utilisation of existing assets and networks – Are these the right objectives and delivery ideas?  
How would you adapt or add to these?



# Responding to this paper

## We are keen to hear your feedback, suggestions and comment.

In order to take part in this consultation, please email your written response, clearly identifying the individual(s) or organisation that you represent, to: [economicd@southend.gov.uk](mailto:economicd@southend.gov.uk).

**The deadline for submitting your response to us is 17:30pm, Friday 22nd December 2017.**

Please ensure that the written feedback provided is constructive, productive and succinct.


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A summary of this publication can be provided in alternative formats such as Braille, audio-tape, or in large print and translated into alternative languages.


Please email [economicd@southend.gov.uk](mailto:economicd@southend.gov.uk)

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# Southend-on-Sea Borough Council

Agenda  
Item No.

Report of Deputy Chief Executive (Place)

to  
Cabinet  
on

19 September 2017

Report prepared by: Jeremy Martin, Energy and Sustainability  
Manager

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## Energy Opportunities Project

Place Scrutiny Committee  
Executive Councillor: Councillor Holland  
Part 1 (Public Agenda Item)

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### 1. Purpose of Report

- 1.1. The purpose of this report is to seek approval to launch a set of energy generation, storage and management services under the Southend Energy brand underpinned by minimum standards and an associated marketing campaign.

### 2. Recommendations

- 2.1. **This proposal recommends that the Council establishes a set of minimum standards for energy generation and storage devices and associated management services to be managed through the proposed governance process**
- 2.2. **That the Council should market the devices and services to help households to save money and reduce their net energy consumption**
- 2.3. **That the scheme be supported by an appropriate governance process, as set out in Para 5, that will approve suppliers and processes for the scheme and the marketing for both the scheme as a whole and individual suppliers.**
- 2.4. **To note that the scheme will be funded over time by referral fees and marketing contributions from suppliers with an initial investment of £50k from the Business Transformation Fund (already approved) to launch the scheme and to fund one staffing post until revenues cover on-going costs. Over time, any net revenues will be used to fund the energy team.**

### 3. Background

- 3.1. In late 2014, the Council adopted the Low Carbon Energy and Sustainability Strategy 2015-2020 (LCESS) which identifies CO2 reduction through energy projects as a priority.
- 3.2. Energy prices for households and businesses are set on a further upward trend despite uncertain levels of wholesale energy prices. Wholesale energy prices have levelled off in 2017 following sharp rises in 2016 but the non-commodity elements of the average household bill have risen to be more than 50% of the unit price and are set to rise by above average inflation for the foreseeable future. The non-commodity costs include those incurred in managing the electricity grid including the new capacity market and the costs of balancing supply and demand which is National Grid's single largest cost (£2bn) and fastest rising.
- 3.3. Electricity generation is expected to continue to change rapidly as coal is phased out by 2025 and as more renewable and nuclear generation facilities come on stream.
- 3.4. Electricity demand is expected to rise over the next 10-25 years driven by the electrification of heat as the government continues to incentivise electric heating over gas, additional cooling and mechanical ventilation required by climate change and the electrification of transport.
- 3.5. As supply and demand patterns change nationally, the risks of imbalances that are unmanageable increase with outlying areas becoming at greatest risk. Local resilience should be a priority within the overall Climate Change Adaptation process.
- 3.6. The energy industry is expanding services that will help it to manage supply and demand and to encourage consumers to use less energy at peak time and to use more at times when supply outstrips demand. Some of these services have been available to large commercial consumers for more than 15 years, such as demand side management where consumers are paid to turn off energy consuming equipment when the grid requires it. Other services are more recent, such as the Capacity market that was launched in 2015-16 and time of day tariffs that are still in development but are common in other parts of the world. A 2015 study for the Infrastructure Commission by Imperial College estimated that, if adopted fully, these services would be worth £8bn per annum by 2030. Collectively, these services can be called Grid Rebalancing Services. The approach is further described in the BEIS/Ofgem Smart Energy plan published on 24 July 2017  
[https://www.gov.uk/government/publications/upgrading-our-energy-system-smart-systems-and-flexibility-plan?utm\\_source=Energy%20Saving%20Trust%20Ltd&utm\\_medium=email&utm\\_campaign=8520914\\_28\\_07\\_17%20Weekly%20Policy%20Update&utm\\_content=Smart%20energy%20plan&dm\\_i=N26,52MS2,LTOEG7,JFKC0,1](https://www.gov.uk/government/publications/upgrading-our-energy-system-smart-systems-and-flexibility-plan?utm_source=Energy%20Saving%20Trust%20Ltd&utm_medium=email&utm_campaign=8520914_28_07_17%20Weekly%20Policy%20Update&utm_content=Smart%20energy%20plan&dm_i=N26,52MS2,LTOEG7,JFKC0,1).
- 3.7. Domestic versions of these Grid Rebalancing Services are available in the US and are set to be launched in the UK with several companies testing processes and systems in Innovate UK projects and ready to launch commercially. The

prerequisite for consumers to be able to exploit these services will be having a battery installed in their home and an agreement with an aggregator to manage the process. Consumers will be paid to allow their home to be operated from the battery from time to time and for their battery capacity to be used to sell services to the grid. Overall, there are an estimated 14 services or revenue streams available to households with the first to be available, Firm Frequency Response, expected to be valued at around 30% of the average consumer's electricity bill.

- 3.8 The Feed-in-Tariff (FiT) regime has been cut substantially making solar PV very much less attractive. Batteries are currently more expensive than is desirable but they make solar PV more economically viable. Recent improvements in battery technology have dramatically increased the life of the equipment and the cost of batteries continues to fall. Some combined PV and battery systems are close to achieving 15-20 year paybacks including funding, maintenance and subscription costs whilst adding grid rebalancing services can dramatically increase the economic benefit.
- 3.9. There are few standards in the market relating to marketing and installation of energy generation and fewer relating to storage. The Renewable Energy Association has launched a Consumer Code of Conduct and the Institute of Engineering has a standard for solar PV installation. No organisation addresses grid rebalancing services making this market open to rogue traders and misleading marketing.
- 3.10. Fuel poverty nationally had been estimated by DECC (2016) at 10.4% but this was before the sharp increases in energy prices experienced in the second half of 2016. In Southend, fuel poverty overall is estimated at under 10% but 27 Lower Super Output Areas (LSOA) are above 10% and 4 are above 15%. With energy inflation set to increase by more than general inflation, fuel poverty is set to increase. Many consumers will be able to off-set the higher energy costs by engaging with Grid Rebalancing Services but many vulnerable households will find this very confusing and difficult to engage especially as multiple services are likely to become available with different financial profiles and revenue opportunities.
- 3.11. The Government sponsored and regulated scheme to assist vulnerable consumers with energy efficiency measures, Energy Companies Obligation (ECO) has been cut from £49 to £30 per electricity consumer to reduce bills. The new ECO processes are concentrating on insulation with very little budget for new boilers or other efficiency measures. The Council has joined LEAP which is an energy industry scheme to promote take up and to advise consumers on ways to reduce their energy costs which will help them to identify both behavioural and equipment based opportunities. The minimum standards and the marketing will therefore seek to engage with schemes that are using the mechanisms established in the 2011 Energy Act to allow householders to fund energy efficiency equipment using the future energy savings available. These schemes are starting to be available as improved versions of the previous failed Green Deal scheme using the same regulations and safeguards for consumers.

## 4. Proposal

- 4.1. Many services will be appropriate for different households in a new market that will have the potential for services to be offered by less scrupulous operators. The Council therefore proposes to establish a marketing scheme under the Southend Energy brand incorporating minimum standards to assist Southend Households to exploit the new markets. This independent verification will help the quality suppliers to promote their services locally increasing take-up whilst helping consumers to make better choices.
- 4.2. Specific marketing will be deployed to target households who could be vulnerable to fuel poverty recognising that reducing the costs to these families for heating and powering their home can have on health and well-being. It will be critical for these customers that equipment can be paid for using the provisions of the Energy Act 2011. Residents will always be advised to regularly review their energy tariffs and to compare the value of products and services with other suppliers.
- 4.3. The minimum standards will cover matters such as financial provisions, warranty, maintenance and the ways these should be linked to finance and product life, ways in which revenue should be shown, some minimum technical requirements particularly relating to safety and matters relating to services. The standards will also link to the marketing of services under the Southend Energy brand whereby companies can use the brand and will also receive support from Council marketing services. Over time, the standards can be extended to include other energy related devices and services.
- 4.4. The Council expects to enter into partnership agreements with suppliers that will offer services and products through Southend Energy such that reasonable marketing and customer liaison costs are covered either directly or through appropriate referral fees. Such amounts will be small as a proportion of each contract, will be declared to customers (although the exact amounts will remain in commercial confidence) and any surpluses will be used primarily to fund the implementation of LCESS, the Council's energy team and then other resources within the Council.
- 4.5. Six potential partners and services have been identified so far with initial discussions progressed to date. Some of these services may be bundled together by the same partner. It should be noted that some of these products and services will by their nature be offered on a long term contract basis, typically 15-25 years. The names of the partners are withheld to comply with confidentiality agreements:
  - 4.5.1. LED/Battery/Solar proposition expected to make households 80% independent of the grid. Savings between 20-40% are expected for most households net of any maintenance, service and funding costs. No initial cost to householder. This supplier is expected to provide a grid rebalancing service as a bundle during 2017.
  - 4.5.2. Battery/Solar proposition at a low initial capital cost. Credit will be available in 2017. This supplier is expected to provide a grid rebalancing service as a bundle during 2017.



- 4.5.3. Free to Roof Solar PV. The free to roof solar market that has been dormant for 2 years is starting to re-emerge. This will provide a solar PV system with energy used by households charged at 7p per kWh (compared to 14p+ for grid electricity). Feed-in-tariffs will be retained by the funder to repay capital costs.
- 4.5.4. Grid rebalancing. Independent aggregators are set to launch domestic services in 2017 for households with batteries installed. Initial revenues to households expected to be around 30% of the average household electricity bill. Around 12-13 additional revenue streams are expected to be delivered which will increase revenues over time even if the initial revenue stream is reduced through over provision.
- 4.5.5. Storage Heater Controls. This supplier will provide a device that can be retrofitted to automatically control storage heaters. 20-40% electricity savings have been demonstrated through better matching of available heat with demand.
- 4.5.6. Green Deal type provision of energy saving equipment using savings generated to fund the supply. The service will provide funding as well as installation now that the Green Deal Finance Company has been closed while the supply, installation and delivery will be governed by the provisions of the 2011 Energy Act.
- 4.6. It is anticipated that all contracts will be formed between the householder and the supplier except where the Council chooses to buy services direct through appropriate procurement processes.
- 4.7. Whilst the primary target for services is the domestic market, many of the products and services will be appropriate for businesses
- 4.8. A Governance process has been established to approve changes to the standards, to approve supplier propositions to be accepted in the scheme and to manage the deployment of the scheme. The Governance process is described at Section 5.

## **5. Governance**

- 5.1. Governance control will be required for implementation and long term operation of the scheme. It is proposed that the Southend Energy partnership should also be managed through the same process.
- 5.2. An Energy Opportunities Board (EOB) has been created to manage implementation, approve marketing plans including PR, to approve the minimum standards and changes over time and to approve suppliers and supplier propositions on the scheme. It is anticipated that the EOB should meet monthly for the first 6-9 months and then at least quarterly in addition to the quarterly meetings that already take place with Southend Energy.
- 5.3. The EOB will be led by the Director of Public Protection and will comprise of the Energy and Sustainability Manager, a member of the Communications team

and the Energy Opportunities Officer with attendance by the Deputy Chief Executive for Place at his discretion.

- 5.4. Day to day negotiation and operation of the scheme will be managed by the Energy and Sustainability Manager who will also continue to manage Southend Energy.

## **6. Timescale**

- 6.1. The earliest possible implementation would be November 2017 but implementation may be delayed to early 2018, following a period of consultation on the minimum standards with the industry and negotiations with potential suppliers.
- 6.2. A period of pre-sales and initial customer consultation will be undertaken using leads gathered from enquiries for previous solar schemes, South Essex Homes and staff leads to ensure that messages and processes are tested. These initial customer discussions and installations will be subject to agreement from the customers to be able to use their details in marketing.
- 6.3. A launch event will be planned in early November using early customer examples to show the potential benefits to households. The event will be held on the pier and will involve planned media briefings and presentations to maximise coverage.
- 6.4. During 2018, the energy team will seek to present the proposition frequently to residents associations, business forums, faith groups and other groups including South Essex Homes and associated social landlords to promote the scheme and to maximise take-up.

## **7. Direct Savings**

- 7.1. Savings for households will vary by product and service and by household circumstances. Based on one LED/Battery and Solar proposition that is likely to be available from launch, most households occupying houses will be able to save 20-40% of their annual electricity costs in the first year although some may see savings at a lower level. These savings will increase by the extent to which energy inflation exceeds RPI each year. Bundling additional services with this proposition is projected to provide an opportunity for further savings of around 30%.
- 7.2. If 3,500 households take up the example proposition above in the first 3 years, between £0.5-1.5m will be released as savings to these households each year.
- 7.3. The project is unlikely to present any direct savings to the Council but is expected to generate revenue in excess of costs over time. Exact revenue has yet to be negotiated with individual suppliers but early conversations have indicated that contributions to implementation resources and marketing expenditure will be available in addition to a profit share or referral fee. It is likely that the revenue will exceed costs approximately 18 months after launch and that the proposed initial investment will have been recovered by the end of 3 years assuming 3,500 installations.

## **8. Other Benefits**

- 8.1. The proposal will save between 1,700 and 5,300 tCO<sub>2</sub> per year based on 3,500 taking up the example proposition as above. The CO<sub>2</sub> reduction represents 0.2-0.7% of total CO<sub>2</sub> emissions for the entire borough.
- 8.2. The proposal will release money into the economy or help households to pay their bills. Reduced debt or better heating of properties is known to have an impact on health – this benefit to public health is unquantifiable.
- 8.3. Implementation of the services and products through this scheme will increase local power resilience as well as reducing the load on the local grid infrastructure.
- 8.4. Most of the services available through the scheme will require internet connections which will be provided where the householder does not already have connection. This will increase interconnectivity and will help to promote the Smart City strategy within Southend.
- 8.5. Assisted living services are available using sensors in the home based on very similar technologies and services. Combining these services with installations through the scheme will cut the costs of providing assisted living services in addition to the benefits from both the energy and the assisted living schemes.
- 8.6. Two of the objections to the smart meter rollout are that energy suppliers can identify private information from smart meter data and that vulnerable people will be unable to move their usage into cheap usage periods when time of day pricing follows implementation. Provision of batteries through the scheme will remove these objections by hiding real consumption because the battery acts as a buffer whilst also providing time-shifting of consumption to protect consumers from high energy cost periods.

## **9. Risks**

- 9.1. Planning. Most of the proposed products and services are not subject to planning or are classed as permitted development. The major exception is Solar PV within the conservation area where any installations facing the highway will require planning permission.
- 9.2. Distribution Network Operator (DNO). Approval for the grid connection of the solar will be required from the DNO – UK Power Networks. As most of the electricity generation will be used on site this is not expected to be a problem but regular liaison will be required. This process will be managed by the individual suppliers.
- 9.3. Technology. There is little technology risk in the services identified to date because all of this equipment and services have been established for many years and in volume. Batteries have been supplied into energy markets for more than 20 years with new battery technologies tried and tested before implementation. Solar PV is well established and improving while grid rebalancing services have been available in the commercial marketplace for over 15 years. The innovation in these proposals are mainly different ways to

package services and funding to make significant savings given the new price points, capability and availability of equipment matched against the rising cost of energy.

- 9.4. Reputation. There is a reputational risk if any of the suppliers fail to match the minimum standards or if few households take up the service. The Governance process is designed to manage the first risk whilst proper marketing will encourage households to take up the services which will offer significant benefits.
- 9.5. Falling Capital Costs. There is a risk that falling capital costs mean that early adopters of the propositions could be left in a long term contract that is less advantageous than later offers due to falling capital costs. This is unlikely despite the near certainty that capital costs will fall because the offers are a bundle of equipment, services and funding set against prevailing energy costs. The reduction in FiTs, increases in interest costs and increases in energy prices have been shown in sensitivity testing to offset any likely reductions in capital costs.
- 9.6. Performance. The financial projections for each service and product depend on the calculated savings and revenue generation from the measures being achieved. These have been calculated cautiously to ensure that the risks are on the upside. Industry quality standards and the provisions for quality management incorporated into the 2011 Energy Act provide assurance on this risk.
- 9.7. Weather. Performance of solar can be weather related and a cool summer with lower than average sunlight may result in a lower yield than predicted. Conversely, a summer with higher than average sunlight will generate a higher yield.
- 9.8. Resources. Some initial Council resources will be required before the revenue available to be earned matches running costs. The cost is estimated at £50k including one post as Energy Opportunities Officer and around £15k marketing in addition to direct resource and marketing contributions. It is estimated that revenues will match costs within 18 months of launch and will repay the initial investment within 3 years but there is a risk that these milestones could be delayed.

## **10. Funding**

- 10.1. No Council Capital will be required for this proposal.
- 10.2. £50k funding has been approved from the Business Transformation Fund to fund one member of staff plus marketing costs until revenues match the direct costs of the scheme – estimated at 18 months from launch.
- 10.3. One full time staff member will be required as the key point of contact and support for the scheme to be funded from the long term revenues expected to be generated.

## **11. Financial Summary**

- 11.1. The project will provide an income stream from referral fees or profit share which will build over time. It is estimated that revenues will exceed costs from around 18 months from launch.
- 11.2. The major beneficiaries of the scheme will be households that engage with services and equipment provision with between £0.5-1.5m being saved by residents each year based on 3,500 installations.

## **12. Assumptions**

- 12.1. The following key assumptions are included in the financial summary:
- Average household electricity consumption is 4,500 kWh per annum
  - 1,200 households per year take up the LED/Battery/Solar proposition each year saving between 10-40%.

## **13. Other Options**

- 13.1 Other options considered include:
- Do nothing. Doing nothing will remove the opportunity for Southend residents to make significant savings on their energy costs in the face of rising energy prices and remove the opportunity for improved local grid resilience. Households wishing to engage with the market would be exposed to a confusing marketplace without support.
  - Select a single supplier. Different households will require different packages for equipment, services and funding such that no single supplier is able to deliver all options. A single supplier would also require a lengthy and costly procurement process.

## **14. Corporate Implications**

### **14.1. Contribution to Council's Vision & Corporate Priorities**

14.1.1 This project will support the delivery of the Council's second Low Carbon Energy and Sustainability Strategy which was adopted in late 2014.

14.1.2 This project will provide significant savings for households and indirect health benefits supporting Council priorities of Healthy and Prosperous.

14.1.3 This project will save between 1700 and 5,300 tCO<sub>2</sub> contributing to Council priority of Clean.

### **14.2. Financial Implications**

No Council capital is required for this project whilst one off revenue funding of £50k from the Business Transformation Fund has been approved for the early months before revenues match and then exceed direct costs, estimated at 18 months.

### 14.3. Legal Implications

14.3.1 It is expected that each supplier will enter into a partnership agreement with the Council to meet the minimum standards and to provide funding to the Council in the form of referral fees and/or profit share as well as appropriate direct contributions to marketing and direct costs. Where a South Essex Homes tenant or any other tenant of the Council wishes to implement one of the services, appropriate landlord's permission will be required.

### 14.4 People Implications

14.4.1 One additional permanent role will be required to provide a central point of contact and reference for the scheme. Over time, the revenues from the scheme will exceed the costs of this role.

### 14.5 Property Implications

14.5.1 There are no implications for Council properties from this proposal

### 14.6 Consultation

14.6.1 The relevant industries, Imperial College, Property and Finance have been consulted. Further discussion has also taken place with Innovate UK, Energy Systems Catapult and the new Green Deal Finance Company.

### 14.7 Equalities and Diversity Implications

14.7.1 There are no equalities and diversity implications as a result of this report.

### 14.8 Risk Assessment

14.8.1 The risks are reviewed in full at Section 8. The major risks relate to falling capital costs and to timing in that revenues may take longer than 18 months to exceed direct costs.

### 14.9 Value for Money

14.9.1 This project will use savings achieved from packages of renewable energy, grid rebalancing revenue and the extra efficiencies generated from battery technology to derive benefits for households in Southend. No Council capital will be deployed for this project.

### 14.10. Environmental Impact

14.10.1 The proposal will save 1,700-5,300t CO<sub>2</sub> per annum based on 3,500 households implementing one of the available propositions.

# Southend-on-Sea Borough Council

Agenda  
Item No.

Report of Corporate Director for Place

to  
**Cabinet**

on

**19 September**

Report prepared by: Krithika Ramesh, Project Officer and  
Justin Styles, Senior Engineer, Major Projects and Strategic  
Transport Policy

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## Southend Central Area Transport Scheme (S-CATS) Phase 2 London Road

**Place Scrutiny Committee**  
**Executive Councillor: Councillor Tony Cox**  
**Part 1 (Public Agenda Item)**

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### 1. Purpose of Report

- 1.1 To provide Cabinet with an update on the progress of the 'Southend Central Area Transport Scheme (S-CATS)'.
- 1.2 To advise Cabinet that two design options have been developed for S-CATS Phase 2 - London Road (between Queensway and College Way, refer to **Appendix 1** for scheme extents) based on "concept design and vision statements" which were included in the S-CATS cabinet paper submitted on 15 March 2016 (**Appendix 2**). These design options were submitted with the Business Case application to the South Essex LEP for Local Growth Funding (refer to **Appendix 3** for design options).
- 1.3 To advise Cabinet that Design Option A has emerged as the preferred option as it scored higher on the scheme options matrix (refer to **Appendix 4**). However, Design Option B also meets all the project objectives and the final selection between the two options will be made upon conclusion of on-going stakeholder and public consultation.

### 2. Recommendations

- 2.1 That Cabinet considers the proposed design options for London Road (between Queensway and College Way) and confirm that either of the two options can be taken forward to construction. This confirmation will allow selection of final design to be carried out in consultation with stakeholders and public.
- 2.2 That Cabinet approves that drainage works can be started along London Road in September 2017 in preparation for the scheme construction to start in October 2017.

- 2.3 That delegated authority be given to the Chief Executive and Deputy Chief Executive (Place), in consultation with the Leader of the Council and the Executive Councillor for Transport, Waste and Regulatory Services, to agree the final design option, Option A or Option B, selected after stakeholder and public consultation, be taken forward to implementation with a programmed commencement in October 2017, together with the advertisement of any necessary Traffic Regulation Orders.

### 3. Background

- 3.1 The Southend Central Area Transport Scheme (S-CATS) is a Local Growth Fund Scheme that has an allocation of £7m. The purpose of the scheme is to take forward aspects of transport and public realm infrastructure that are seen as necessary to support both housing and employment growth in the Town Centre.

The scheme is being developed in four phase:

<b>S-CATS</b>	<b>Phase 1:</b> Victoria Avenue Improvements	<b>Phase 2:</b> London Road Area (between Queensway-London Road roundabout and College Way)	<b>Phase 3:</b> Stud end of London Road Area (between College Way and Victoria Circus)	<b>Phase 4:</b> Victoria Circus
Financial Year	2016-2017	2017-2018	2018-2019	2019-2020
Local Growth Fund	£1m	£2m	£2m	£2m

Phase 1 included a series of junction improvements along Victoria Avenue that better manages traffic into and out of the town centre. Access and public realm improvements along London Road, College Way, Queens Road and Elmer Avenue are the next steps to encourage more residents and tourists to visit and spend time in the Town Centre and for local businesses to flourish.

Therefore, Phase 2 focuses on London Road (between Queensway and College Way), which is the key western approach for pedestrians and cyclists into the town centre. Phase 2 also includes streetscape works on the College Way / Queens Road / Elmer Avenue route between London Road and The Forum / South Essex College.

The scheme supports and compliments the improvements made to A127/A13 Victoria Gateway and links to the junction improvement works along Victoria



Avenue and continues public realm, walking & cycling enhancements being undertaken along Victoria Avenue as a part of S-CATS phase 1.

- 3.2 The Business Case was submitted to the South East LEP (SELEP) in July 2017 to unlock £2m from the Local Growth Fund to deliver S-CATS Phase 2.

Southend Central Area Transport Scheme (S-CATS) represents a major opportunity to support the continued growth and regeneration of the Southend Central Area. It is the delivery mechanism for the policies set out in the Southend Central Area Action Plan (SCAAP) Revised Proposed Submission Document that are aimed at strengthening and transforming the Town Centre sub-regional role as a successful commercial and retail destination, cultural hub, educational centre of excellence, leisure and tourism attraction – an excellent place to live, work and visit.

- 3.3 Two design options have been developed for London Road based on ‘Concept designs and Vision Statements’ for the S-CATS scheme which were included in S-CATS cabinet paper submitted on 15 March 2016 (**Appendix 2**).

In both options the key features of the proposed layouts include:

- Realignment of the carriageway to include provision for cycling
- Replacement of Sainsbury’s’ mini roundabout with simple junction that is at a raised level acting as a traffic calming feature simplifying movements for pedestrians at this location
- Replacement of the mini roundabout junction at College Way with a simple junction that is also at a raised level acting as a traffic calming feature
- Raised tables at London Road’s junction with Ashburnham Road and Gordon Road
- Reduction in speed limit from 30mph to 20mph
- Sustainable Urban Drainage System along the footway and cycleway
- Improved street lighting
- Block paving of footway, cycleway and parking bays
- Improvements to landscaping including introduction of trees and planters

These changes will require the reallocation of road space to provide a larger area for pedestrians and an improved street environment, while also maintaining essential access for delivery vehicles, taxis and cars.

- 3.4 Improved safety, access and mobility in the town centre area will encourage more walking and cycling, resulting in positive benefits for health and well-being, whilst also enabling a “shop local” culture, reinforcing the offer of the High Street.
- 3.5 Public realm and transport investment plays a key role in raising aspirations, the quality and growth potential of an area and is therefore at the core of this work. The scheme will invest £7m in improvements, which will support both Borough Council and private sector investments and development.

## **4. Other Options**

- 4.1 The Southend Central Area Action Plan (SCAAP) will guide development and regeneration within the town centre area and central seafront until 2021. The Southend Central Area Action Plan (SCAAP) Revised Proposed Submission Document sets out all known major potential development sites and the vision for them within the central area which includes the key sites identified for the Southend Central Area Transport Scheme.
- 4.2 Without the improvement that S-CATS Phase 2 will bring, the wider improvements to the Town Centre as set out in the SCAAP, both completed and planned will not fully maximise their intended benefits. This will have on-going consequences for securing investment in Southend.
- 4.3 This intervention will demonstrate a strong commitment to provide the infrastructure needed to support growth in the Town Centre. Whilst the development will be phased over the SCAAP period, it must be recognised that in order to encourage the investment and to revitalise the Town Centre, a clear funded route for infrastructure development must be put forward to support the SCAAP developments and further economic growth.
- 4.4 The other option would be to take no action on these issues and continue as now in which case the investment opportunity would be lost. This would reduce the contribution to supporting local health and wellbeing and restrict accessibility and local mobility, and potentially undermine business confidence and investment within this area.
- 4.5 This scheme is a critical element of a wider improvement to support planned growth in Southend Central Area. Therefore if the scheme is not progressed there will be a greater impact from planned growth, including reduced highway capacity, increasing congestion and a lack of access to sustainable transport choices.

## **5. Reasons for Recommendations**

- High quality public realm enhancements will create spaces within the Town Centre to attract more people to the area, encourage activities in the public spaces and revitalise the commercial areas.
- Improved access to the High Street will encourage more walking and cycling
- The better streets and public spaces will bring greater civic pride to encourage investment and visitor numbers supporting the local economy.
- To support the spatial planning activity identified in the SCAAP and other plans either prepared or being prepared by the Council's planning team.
- To support and align with S-CATS phase 1 to provide a welcoming Gateway to the Town Centre.

## 6. Corporate Implications

### 6.1 Contribution to Council's Vision & Corporate Priorities

The SCATS will be fully aligned to delivering the vision and corporate priorities, particularly prosperous in respect of supporting the SCAAP and other plans either prepared by or under preparation by the Council's planning team.

### 6.2 Financial Implications

The SCATS is seeking funding of £7m from the South Essex Local Enterprise Partnership. The allocation is profiled across four years as set out below and is wholly grant funded. The allocation for 2017/18 will deliver the Phase 2-London Road improvement and support design work to enable the other scheme elements to commence in 2017/18.

Financial Year	2016-2017	2017-2018	2018-2019	2019-2020
Local Growth Fund	£1m	£2m	£2m	£2m

### 6.3 Legal Implications

Any necessary Traffic Regulation Orders will be identified and follow the legal processes.

### 6.4 People Implications

The scheme affects the lives of all those who live, work and visit the town. The implications are positive as the intention to improve accessibility and safety and improve the public realm.

### 6.5 Property Implications

The schemes proposed will affect land for which the Council is the highways authority and will involve working with private landowners and local business, especially Sainsbury's, to bring forward detailed proposals.

### 6.6 Consultation

The consultation process for this work is based on the "Southend Together" toolkit which seeks to engage and inform residents, businesses and key stakeholders throughout the life of the project.

Detailed stakeholder engagement plan attached (**Appendix 5**)

### 6.7 Equalities and Diversity Implications

Best practice will be adopted in the design proposals with the aim to improve accessibility for pedestrians, cyclist and the disabled which will be a major factor in the development of the scheme.

Different user groups have different needs and part of the development of the final design plans will be a full equality analysis as part of the stakeholder engagement plan.

## 6.8 Risk Assessment

Risks are reviewed throughout the life of the project and mitigation measures undertaken to reduce risks.

## 6.9 Value for Money

S-CATS Phase 2 represents Very High Value for Money with a BCR of 4.06.

The following Value for Money indicators have been estimated for S-CATS Phase 2:

- Present Value of Benefits (PVB): £8.43 million (2010 prices with future benefits over a 60-year appraisal period discounted to 2010).
- Present Value of Costs (PVC): £2.07 million (2010 prices with future costs over a 60 year appraisal period discounted to 2010).
- Net Present Value (NPV): £6.36 million (2010 prices discounted to 2010).
- Benefit Cost Ratio (BCR): 4.06.

Sensitivity analyses show that a four-fold increase in scheme costs would be required to reduce the BCR to 1.0. Sensitivity analyses also show that the BCR is not overly sensitive to small changes in the main assumptions.

(Refer to **Appendix 6** for more details)

## 6.10 Community Safety Implications

Understanding the community safety impacts and improving the quality of streets and public spaces provided in the Town Centre area is an essential part of this scheme.

## 6.11 Environmental Impact

This will be considered in the effective re-use of materials, sustainability of the supply chain, flood risk and managing surface water systems, low energy lighting systems and ensuring that corporate policies are considered.

## 7. Background Papers

Southend Central Area Action Plan (SCAAP) Revised Proposed Submission Document:

**[http://www.southend.gov.uk/info/200420/development\\_plan\\_documents/391/southend\\_central\\_area\\_action\\_plan\\_scaap](http://www.southend.gov.uk/info/200420/development_plan_documents/391/southend_central_area_action_plan_scaap)**

## 8. Appendices

**Appendix 1:** Southend Central Area Transport Scheme (S-CATS) Phase 2 scheme extents.

**Appendix 2:** Southend Central Area Transport Scheme (S-CATS) Cabinet paper submitted on 15 March 2016.

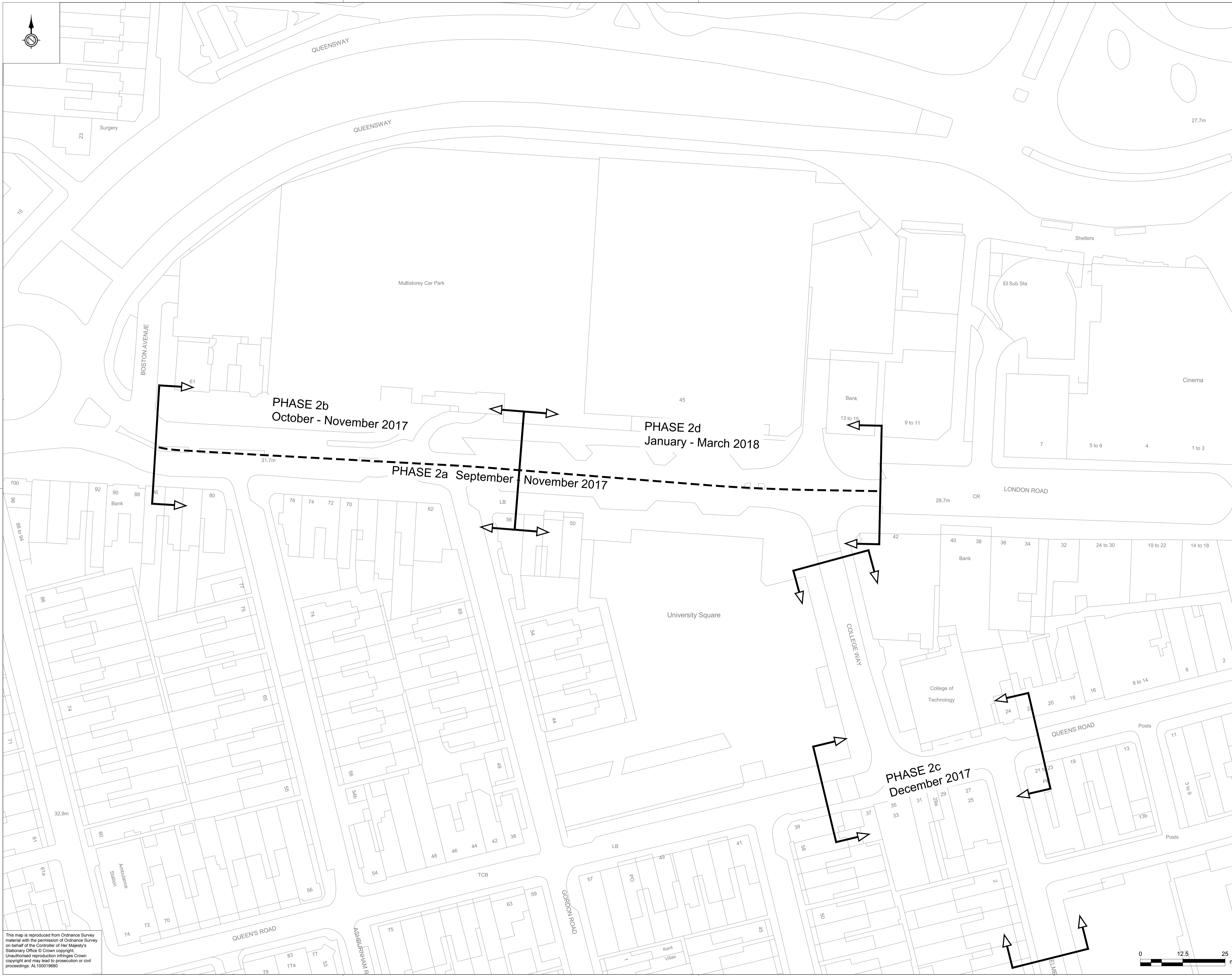
**Appendix 3:** Southend Central Area Transport Scheme (S-CATS) Design Options.

**Appendix 4:** Southend Central Area Transport Scheme (S-CATS) Phase 2 scheme options matrix

**Appendix 5:** Southend Central Area Transport Scheme (S-CATS) Phase 2 Stakeholder engagement plan

**Appendix 6:** Southend Central Area Transport Scheme (S-CATS) Phase 2 Economic Appraisal

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Revisions			
Rev	Details	Auth	Date
A	Original Issue.		

**SAFETY, HEALTH AND ENVIRONMENTAL INFORMATION**

In addition to the hazards/risk normally associated with the types of work detailed on this drawing, note the following significant residual risks

Construction	None.
Maintenance/Cleaning	None.
Use	None.
Decommissioning/Demolishing	None.

**Southend-on-Sea Borough Council**

Department for Place

PO Box 5560, Civic Centre  
Victoria Avenue, Southend on Sea,  
SS2 6ZQ

Project Title

**S-CATS Town Centre**

Drawing Title

**London Road Phase 2 Construction Phase Plan**

Drawn	Date	Scale
MKW	08/08/17	@ A1
Checked	Date	1:500
Review	Date	
Approved	Date	Revision
		A

Drawing Status	
Preliminary	Construction
Tender	As Constructed

Drawing Number  
SBCC10702-102/SBC/LR/C/0017

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# Southend-on-Sea Borough Council

Agenda Item No.

## Report of Corporate Director for Place

to  
**Cabinet**

on

**15 March 2016**

Report prepared by: Paul Mathieson, Group Manager, Major Projects and Strategic Transport Policy and Krithika Ramesh, Project Officer

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### Local Growth Fund - Southend Central Area Transport Scheme Update and Future Development

**Place Scrutiny Committee**  
**Executive Councillor: Councillor Martin Terry**  
**Part 1 (Public Agenda Item)**

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#### 1. Purpose of Report

- 1.1 To provide Cabinet with an update on the progress of the 'Southend Central Area Transport Scheme'.
- 1.2 To seek views from Cabinet on the draft "concept design and vision statements" for Victoria Avenue, London Road (Town Centre), Southchurch Road (between the High Street and Chichester Road) and Victoria Circus (see **Appendix 1** for scheme extents), which will be developed into preliminary design layouts for consultation to support the Business Case application to the South Essex LEP for Local Growth Funding
- 1.3 To advise Cabinet that a preliminary design has been developed for the Carnarvon Road junction with Victoria Avenue (incorporating a right turn facility) which can now be taken forward to the detailed design stage as set out in **Appendix 2** and subsequently proceed to Business Case submission as above.

#### 2. Recommendations

- 2.1 That Cabinet considers the proposed "concept design and vision statements" for the Southend Central Area Transport Scheme and agree that these be worked up into option layouts and taken forward for stakeholder and public consultation sufficient for SELEP Business Case submission and funding approval in June. In consulting on these proposals the Cabinet also agrees that other suggestions in and around the Town Centre to improve access and movement would be welcomed.
- 2.2 That Cabinet approves the preliminary layout design for the traffic signal junction at Carnarvon Road and Victoria Avenue, incorporating a right-turn out of Carnarvon Road, so that detailed design can commence. Any

**loss of vegetation caused by the change in road layout will be replaced within the scheme.**

**2.3 That Cabinet approves the principal that, wherever possible, landscape elements are designed with integrated Sustainable Urban Drainage Systems (SUDS) in mind and that permeable surface treatments will be considered to attenuate surface water run-off from the Town Centre area and reduce the risk of flooding.**

**2.4 That delegated authority be given to the Chief Executive and Corporate Director for Place, in consultation with the Leader of the Council and the Portfolio Holder for Public Protection, Waste and Transport following circulation of details to Ward Councillors and discussions with the Leaders of the opposition parties to agree:-**

- the preliminary design layouts developed from the “concept design and vision statements” for consultation and subsequent submission of the Business Case for approval, with a programmed commencement in 2017/18. Details to be brought to a future Cabinet meeting to agree the final design for construction.**
- the detailed design proposals for the Carnarvon Road junction to be taken forward to Business Case submission for implementation in 2016/17, together with the advertisement of any necessary Traffic Regulation Orders**

### **3. Background**

**3.1 The Southend Central Area Transport Scheme (SCATS) is a Local Growth Fund Scheme that has an allocation of £7m. The purpose of the scheme is to take forward aspects of transport and public realm infrastructure that are seen as necessary to support both housing and employment growth in the Town Centre. The scheme is at the concept and preliminary design stages and it is timely that Cabinet considers the proposals so far, in order that a Business Case submission can be made to the South East LEP (SELEP) in June to release the Local Growth Funding allocated to this scheme.**

**3.2 The draft Southend Central Area Action Plan (SCAAP) outlines the policy response to the challenges and opportunities presented within the Southend Central Area, as part of the spatial strategy for Southend set out in the Core Strategy. This makes provision for a large share of the Borough’s new growth and regeneration to be focussed in the Central Area. The SCAAP, when adopted, will give site specific policies aimed at strengthening and transforming Southend Town Centre’s sub-regional role as a successful commercial and retail destination, cultural hub, educational centre of excellence, leisure and tourist attractive, and as a place to work and live.**

**3.3 The SCATS will support this vision by building upon existing successes and investment and unlocking the potential of significant regeneration opportunities. Developments within the Central Area will be supported by transport and public realm improvements to create a safe and vibrant atmosphere for communities and businesses and as a welcoming visitor experience.**

3.4 Public realm and transport investment plays a key role in raising aspirations, the quality and growth potential of an area and is therefore at the core of this work. The scheme will invest £7m in improvements, which will support both Borough Council and private sector investments and development.

3.5 Improved safety, access and mobility in the town centre area will encourage more walking and cycling, resulting in positive benefits for health and well-being, whilst also enabling a “shop local” culture, reinforcing the offer of the High Street.

3.6 The draft “concept design and vision statements” are focussed on the first four areas with the fifth area of more detail comprising Carnarvon Road:-

1. *Victoria Avenue*

The vision for Victoria Avenue is for it to be a gateway into the town centre. The key design features will include:

- Gateway Features  
Gateway features that create a visual connection with the town centre and gradually increase in drama and visual impact as the town centre is approached;
- Use of Subway  
Study the level of pedestrian usage of the subway and consider replacing it with at-grade crossings;
- Public Realm Improvements  
Refurbish the footways and adjust the accesses to the service road, especially along the west side of the road with high quality paving, lighting, seating and tree planting. Improve the public spaces to better serve the Civic area and the new residential developments, extending to Victoria Gateway;
- Sustainable Urban Drainage Systems  
Identify potential locations and type of SUDS to attenuate surface water run-off from this area to reduce the risk of flooding.

2. *London Road – from Queensway to Victoria Circus*

Improvements in the area will be focussed on enhancing the experience for visitors, residents and workers, and extending the activities in the public spaces throughout the day and into the evening. The key design features will include:

- Encouraging more pedestrian footfall & cycling  
High quality public realm enhancements to create a pedestrian-priority area and improvements for pedestrians and cyclists.
- Outside seating areas  
The restaurants and cafes could make better use of space on the street to create a more vibrant atmosphere.
- Alignment Improvements

Changes to the allocation of road space to provide a greater area for pedestrians and a better street environment, whilst maintaining essential access for delivery vehicles and taxis.

- Sustainable Urban Drainage Systems  
Identify potential locations and type of SUDS to attenuate surface water run-off from this area to reduce the risk of flooding.

### 3. Victoria Circus

Victoria Circus is a focal point for the Town Centre attracting people from Victoria Gateway, London Road and Southchurch Road towards the High Street. Improvements will focus on:-

- Encouraging more pedestrian footfall through a better public realm  
The public realm improvements will consider additional seating, landscaping elements and features that help establish the space as a focal point and activity space, whilst maintaining the desired pedestrian routes across the area and access for emergency vehicles;
- Welcoming access routes  
The alleyway from Victoria Gateway to Victoria Circus is one of the main routes to and from the Town Centre and should welcome people and encourage them to visit the High Street. Introduction of vertical features like canvas along the side walls, colourful roof features and lighting will help highlight this route to the town centre.
- Sustainable Urban Drainage Systems  
Identify potential locations and type of SUDS to attenuate surface water run-off from this area to reduce the risk of flooding.

### 4. Southchurch Road – short section linking Carnarvon Road and the High Street

- Improve appearance of the Deeping underpass  
The appearance of the Deeping parapet and access to the underground service area needs improvement;
- Pocket Park  
Enhancement of landscaping elements (with integrated SUDS) to provide a coherent, linked number of green spaces essential for improving the environment of the area;
- Pedestrian crossing  
Surface treatment at the pedestrian crossing at the entrance of the Deeping to highlight this as a route to the High Street (also to be considered as part of the Better Queensway Project)

### 5. Carnarvon Road junction with Victoria Avenue

- Provide a new right turn out of Carnarvon Road

Identified need for the right turn from Carnarvon Road on to Victoria Avenue, partly due to the re-development of the old College site;

- Replacement of vegetation  
Any loss of vegetation caused by the change in the junction layout will be replaced within the scheme;
- Traffic Movements  
Impact on traffic movements are negligible with the signal timings consistent with junctions either side and pedestrian movements

#### **4. Other Options**

- 4.1 The Southend Central Area Action Plan (SCAAP) will guide development and regeneration within the town centre area and central seafront until 2021. The Preferred Approach version of the SCAAP sets out all known major potential development sites and the vision for them within the central area which includes the key sites identified for the Southend Central Area Transport Scheme.
- 4.2 The other option would be to take no action on these issues and continue as now in which case the investment opportunity would be lost.

#### **5. Reasons for Recommendations**

- 5.1 The concept design and vision statements to guide the SCATS focus on ensuring that:-
- High quality public realm enhancements will create spaces within the Town Centre to attract more people to the area, encourage activities in the public spaces and revitalise the commercial areas.
  - Improved access to the High Street will encourage more walking and cycling
  - The better streets and public spaces will bring greater civic pride to encourage investment and visitor numbers supporting the local economy.
  - To support the spatial planning activity identified in the SCAAP and other plans either prepared or being prepared by the Council's planning team.

#### **6. Corporate Implications**

##### **6.1 Contribution to Council's Vision & Corporate Priorities**

The SCATS will be fully aligned to delivering the vision and corporate priorities, particularly prosperous in respect of supporting the SCAAP and other plans either prepared by or under preparation by the Council's planning team.

##### **6.2 Financial Implications**

The SCATS is seeking funding of £7m from the South Essex Local Enterprise Partnership. The allocation is profiled across four years as set out below and is wholly grant funded. The allocation for 2016/17 will deliver the Carnarvon Road improvement and support design work to enable the other scheme elements to commence in 2017/18.

Financial Year	2016-2017	2017-2018	2018-2019	2019-2020
Local Growth Fund	£0.75m	£2.25m	£2m	£2m

### 6.3 Legal Implications

Any necessary Traffic Regulation Orders will be identified and follow the legal processes. In the case of London Road and Victoria Circus, procedures to obtain permission for outside seating and event spaces will be consulted upon and followed.

### 6.4 People Implications

The scheme affects the lives of all those who live, work and visit the town. The implications are positive as the intention to improve accessibility and safety and improve the public realm.

### 6.5 Property Implications

The schemes proposed will affect land for which the Council is the highways authority and may involve working with private landowners to bring forward detailed proposals.

### 6.6 Consultation

The consultation process for this work is based on the “Southend Together” toolkit which seeks to engage and inform residents, businesses and key stakeholders throughout the life of the project

There will be a stakeholder engagement plan prepared and all aspects of the design plans for Victoria Avenue, London Road and Victoria Circus will be consulted on.

### 6.7 Equalities and Diversity Implications

Best practice will be adopted in the design proposals with the aim to improve accessibility for pedestrians, cyclist and the disabled which will be a major factor in the development of the scheme.

Different user groups have different needs and part of the development of the final design plans will be a full equality analysis as part of the stakeholder engagement plan.

### 6.8 Risk Assessment

Risks are reviewed throughout the life of the project and mitigation measures undertaken to reduce risks.

#### 6.9 Value for Money

This will be assessed in the financial analysis and Business Case preparation.

#### 6.10 Community Safety Implications

Understanding the community safety impacts and improving the quality of streets and public spaces provided in the Town Centre area is an essential part of this scheme.

#### 6.11 Environmental Impact

This will be considered in the effective re-use of materials, sustainability of the supply chain, flood risk and managing surface water systems, low energy lighting systems and ensuring that corporate policies are considered.

### 7. Background Papers

Preferred Approach Southend Central Area Action Plan

[http://www.southend.gov.uk/downloads/download/603/scaap -  
december 2015](http://www.southend.gov.uk/downloads/download/603/scaap_-_december_2015)

### 8. Appendices

**Appendix 1** SCATS – Scheme Extents

**Appendix 2** SCATS – Layout of proposed Carnarvon Road junction with Victoria Avenue

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QUEENSWAY/  
LONDON ROAD SCHEM  
(COMPLETED 2014)

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Revisions			
Rev	Details	Auth	Date
A	Original Issue	KR	Jun-17

SAFETY, HEALTH AND ENVIRONMENTAL INFORMATION	
In addition to the hazards/risk normally associated with the types of work detailed on this drawing, note the following significant residual risks:	
Construction	
Maintenance/Cleaning	
Demolition/Refurbishment	

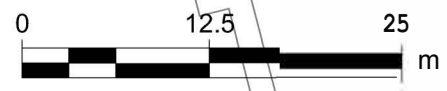
**Southend-on-Sea Borough Council**  
 Department for Place  
 PO Box 5560, Civic Centre  
 Victoria Avenue, Southend on Sea,  
 SS2 6ZQ

Project Title  
**S-CATS Town Centre**  
 Drawing Title  
**London Road Phase 2 Option A**

Drawn KR	Date 08/06/2017	Scales@A1
Checked CDS	Date 23/06/17	<b>1:500</b>
Review JMS	Date 26/06/17	
Approved XXX	Date 26/06/17	Revision A

Drawing Status	
Preliminary	<input checked="" type="checkbox"/> Construction
Tender	<input type="checkbox"/> As Constructed

Drawing Number  
 SBCC10702-102/SBC/LR/C/0008



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Revisions			
Rev	Details	Auth	Date
A	Original Issue	-	Apr-17

SAFETY, HEALTH AND ENVIRONMENTAL INFORMATION	
In addition to the hazards/risk normally associated with the types of work detailed on this drawing, note the following significant residual risks	
Construction	None
Maintenance/Cleaning	None
Use	None
Decommissioning/Demolishing	None

**Southend-on-Sea Borough Council**

Department for Place

PO Box 5560, Civic Centre  
Victoria Avenue, Southend on Sea,  
SS2 6ZQ

Project Title

**S-CATS Town Centre**

Drawing Title

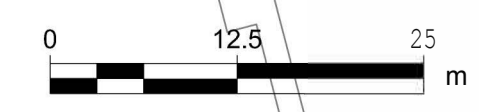
**London Road Phase 2 Option B**

Drawn MKW	Date 08/06/2017	Scales @A1
Checked CDS	Date 23/06/17	<b>1:500</b>
Review JMS	Date 26/06/17	
Approved KR	Date 26/06/17	Revision A


Drawing Status	
Preliminary	<input checked="" type="checkbox"/> Construction
Tender	<input type="checkbox"/> As Constructed

Drawing Number  
SBCC10702-102/SBC/LR/C/0009

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# Southend Central Area Transport Scheme (S-CATS)

## Phase 2: London Road

### Key Benefits and Scheme Options Matrix

Doc. Ref: Key Benefits /  
Options Matrix

Version: 04

Date: July 2017

# The Place Diagram—Key benefits tool

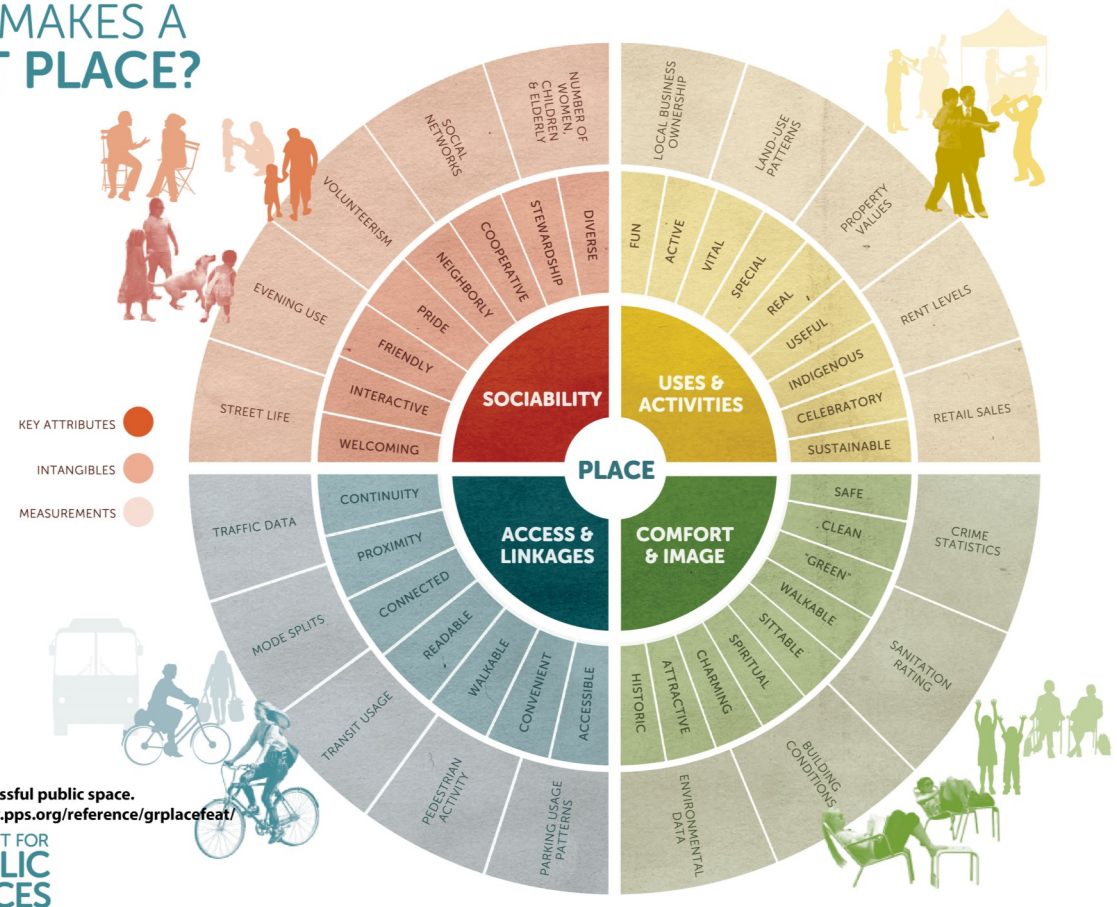
In evaluating thousands of public spaces around the world, [Project for Public Spaces](#) found that to be successful, they generally share the following four qualities: they are **accessible**; people are engaged in **activities** there; the space is **comfortable** and has a good image; and finally, it is a **sociable** place: one where people meet each other.

**The Place Diagram** (shown on the right) developed by Project for Public Spaces has been used as a tool to represent the intangible benefits linked to the tangible key benefits of the S-CATS Phase 2 scheme options (Scheme option plans enclosed in Appendix 3).

In the following pages, the intangible benefits achieved by Option A and B are shown in the Place Diagram, whilst those that are not achieved have been removed (spiritual, historic and stewardship).

Tangible and intangible benefits of Option A that score higher than Option B are marked with a star symbol .

## WHAT MAKES A GREAT PLACE?



Attributes of a successful public space.

Source: <https://www.pps.org/reference/grplacefeat/>



# EXISTING LAYOUT

## Tangible issues

### Unattractive Gateway to Town Centre

The existing streetscape fails to create an attractive gateway due to poor quality of public realm, street clutter, and lack of greenery, street furniture and facilities for cyclists.

### Fails to encourage walking and cycling

The existing road layout lacks any facilities for cyclists. Cyclists entering this section of London Road from Queenway Roundabout would have to leave the cycle path and join the carriageway.

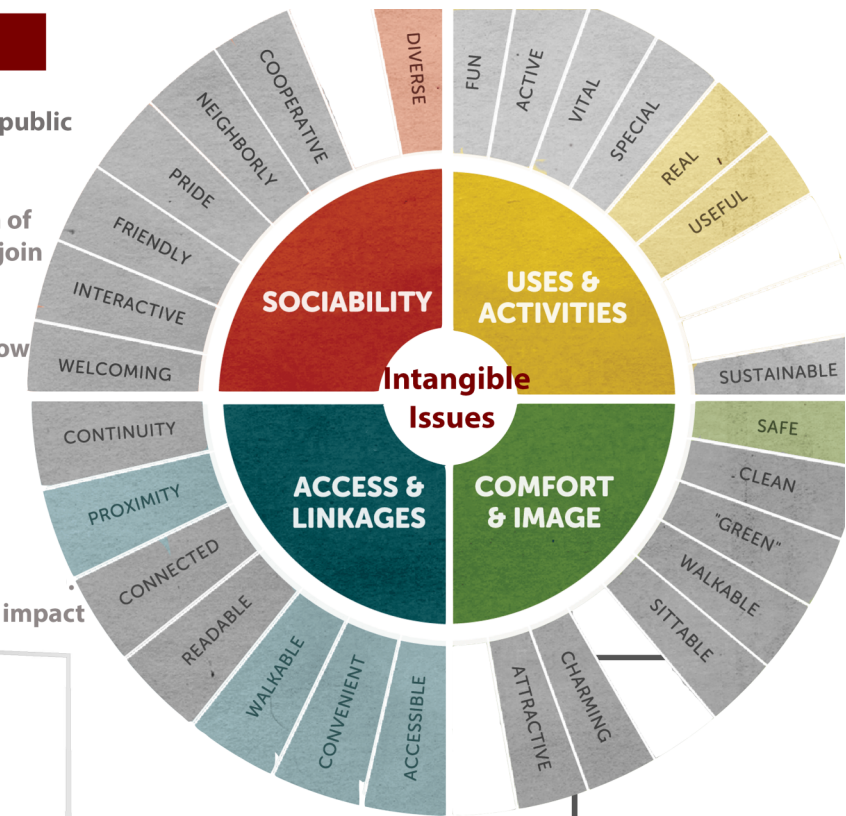
There are twice as many pedestrians using this section of London Road compared to vehicles but as can be seen in the allocation of space is disproportionate to the flow. There is a lack of street furniture that would provide resting spots, especially useful to elderly and those with mobility issues.

### Safety for pedestrians and cyclists

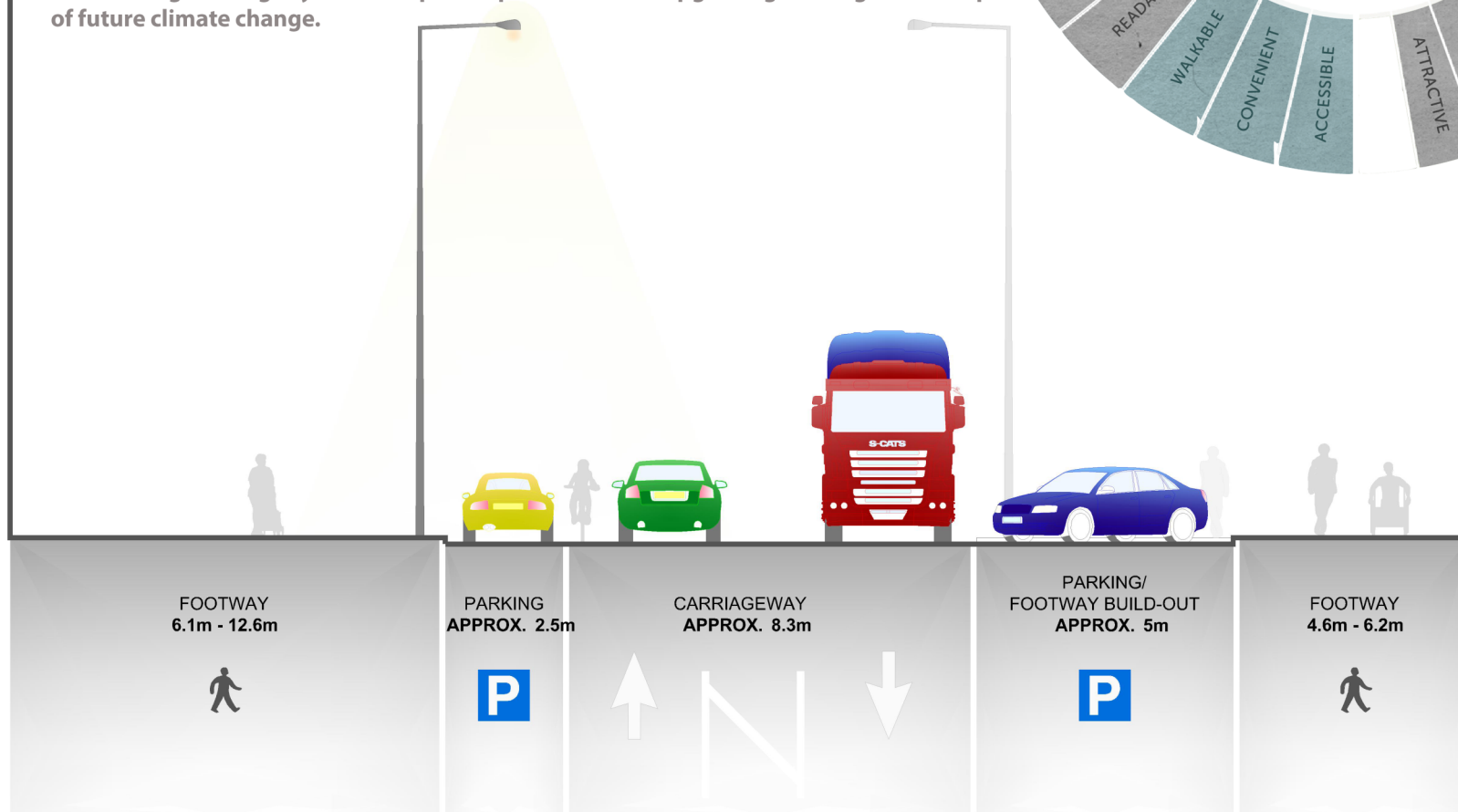
The width of carriageway, lack of cycle lane and street clutter fails to create a safe and friendly environment for pedestrians and cyclists.

### Climate Adaptation/ SUDS

The project area has large impermeable surfaces and a lack of greenery. The existing drainage system is in poor repair and needs upgrading to mitigate the impact of future climate change.



● Intangible issues



# OPTION A

## Tangible benefits

### Welcoming Gateway to Town Centre

Improved environment for visitors and residents with public realm enhancements, landscaping, lighting and street furniture.

★ The additional cycleway/footway along the centre of the carriageway provides the opportunity for planting and street furniture to create a more welcoming impact.

### Encouraging walking and cycling

Widened and improved footways, realignment of carriageway to provide additional space for pedestrians and cyclists, cycle parking, traffic calming measures and better signage.

★ Central footway/cycleway puts pedestrians and cyclists in a prime location which will change the overall character of the space from one that supports car use to one that encourages more walking and cycling.

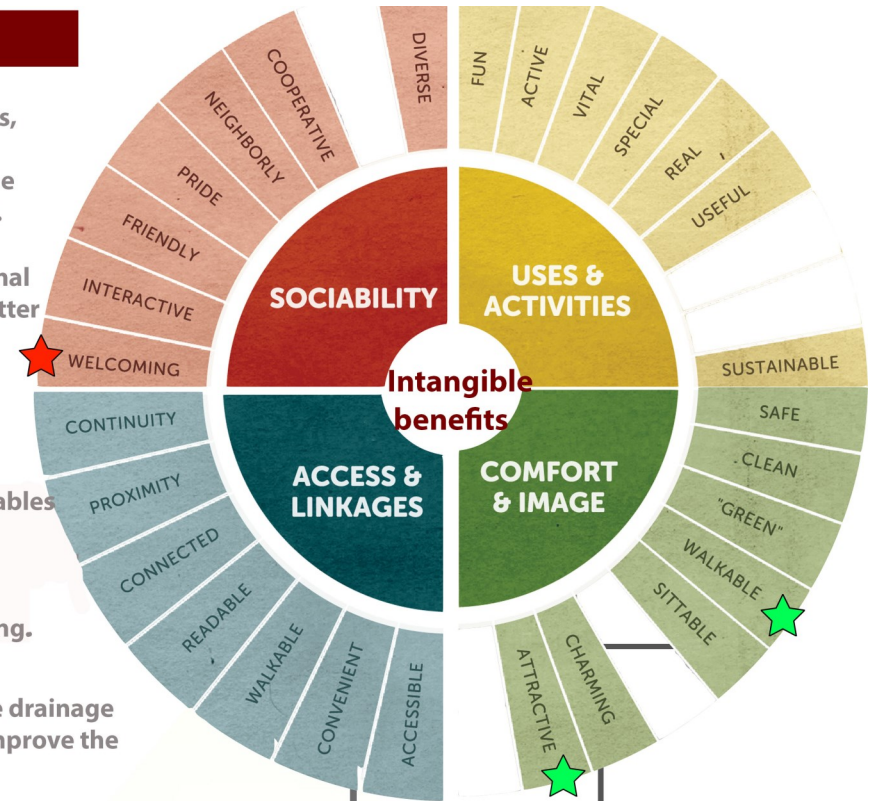
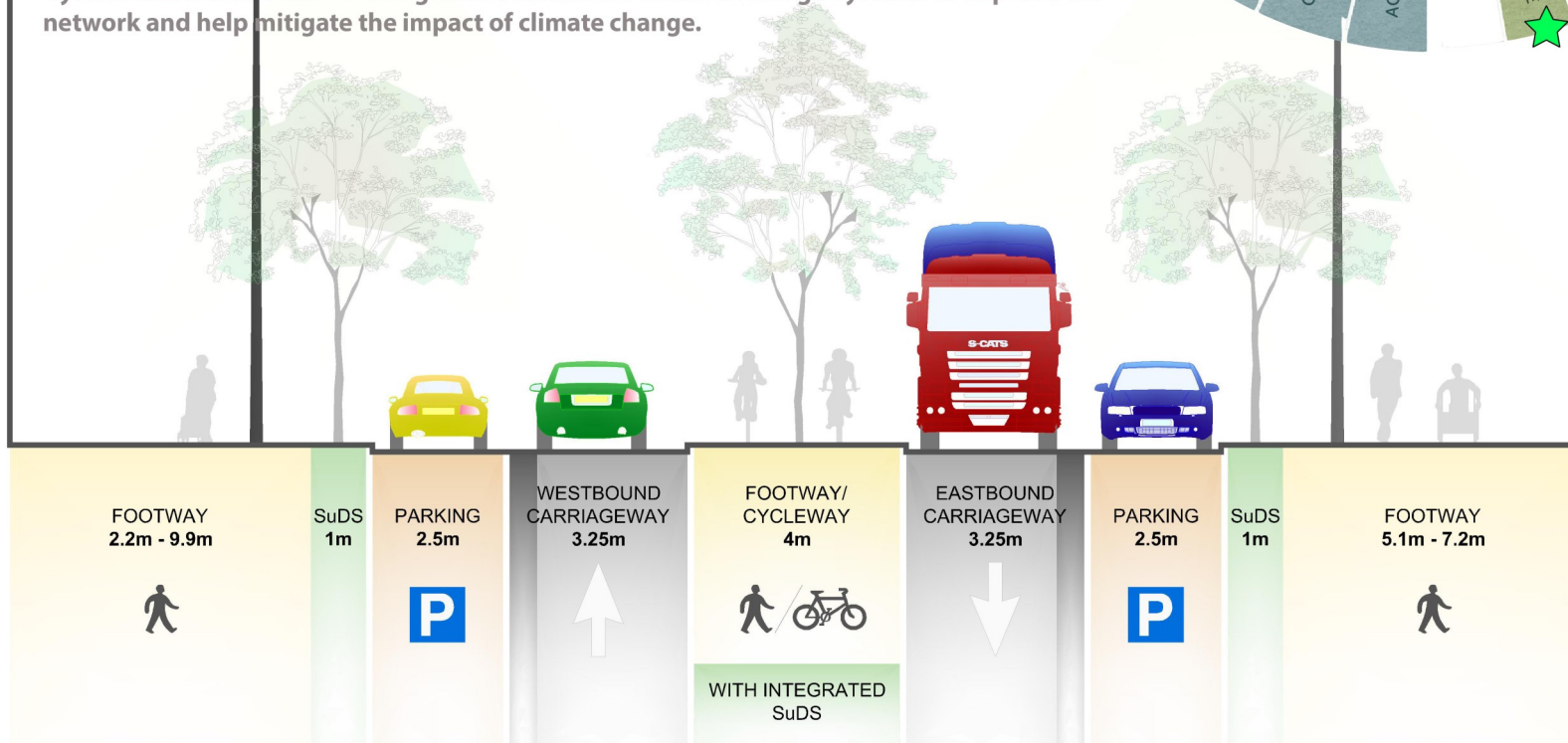
### Improved safety for pedestrians and cyclists

Improved permeability for pedestrians and cyclists across junctions with raised tables  
The carriageway width is reduced to 3.25m one way with detailing that visually reduces the width further and the speed is reduced from 30mph to 20mph.  
This will improve the perceived safety for pedestrians and cyclists.

Cycleway with clear signage, improved footway, street furniture and better lighting.

### Climate Adaptation/ SUDS

The proposed layout includes addition of trees and green spaces, upgrades to the drainage system and introduction of integrated Sustainable Urban Drainage Systems to improve the network and help mitigate the impact of climate change.



● ● ● ●  
Intangible benefits achieved by the Option A

★ ★  
Tangible and intangible benefits of Option A than score higher than Option B



# OPTION B

## Tangible benefits

### Welcoming Gateway to Town Centre

Improved environment for visitors and residents with public realm enhancements, landscaping, lighting and street furniture.

However the combined cycleway/footway at the edge of the scheme are less favourable as they create greater conflict between user groups.

### Encouraging walking and cycling

Widened and improved footways, realignment of carriageway to provide additional space for pedestrians and cyclists, cycle parking, traffic calming measures and better signage.

However the combined cycleway/footway at the edge of the scheme are less favourable as they create greater conflict between user groups.

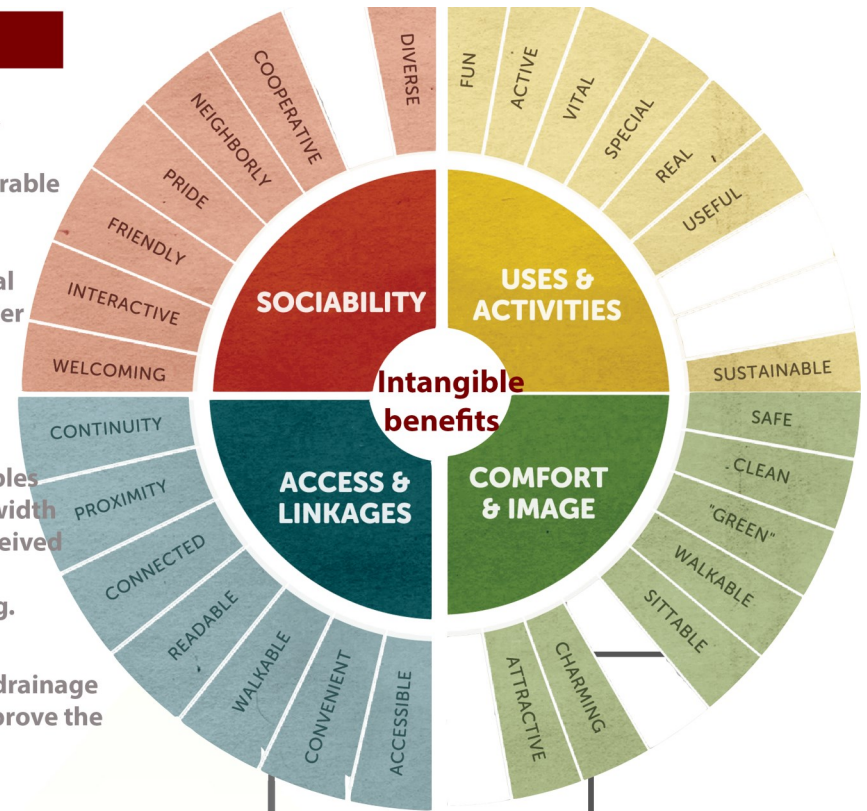
### Improved safety for pedestrians and cyclists

Improved permeability for pedestrians and cyclists across junctions with raised tables. The carriageway width is reduced to 3.0m with detailing that visually reduces the width further and the speed is reduced from 30mph to 20mph. This will improve the perceived safety for pedestrians and cyclists.

Cycleway with clear signage, improved footway, street furniture and better lighting.

### Climate Adaptation/ SUDS

The proposed layout includes addition of trees and green spaces, upgrades to the drainage system and introduction of integrated Sustainable Urban Drainage Systems to improve the network and help mitigate the impact of climate change.



Intangible benefits achieved by the Option A

Based on the key benefits of each scheme option as described in the previous pages, they score as follows:

Scheme objectives		To support and align with S-CATS Phase 1 to provide a welcoming Gateway to the Town Centre.	Improve safety, accessibility and health and wellbeing through improved provision for pedestrians and cyclists.	To encouraging more pedestrian footfall & cycling through quality public realm improvements and enhancements to walking/cycling infrastructure.	To support the development of the centre of Southend in terms of delivering new housing, increased local business and the improved offer for tourist	To integrate Sustainable Urban Drainage Systems where possible to mitigate impacts of climate change	To contribute to the wider SCAAP ambition.	Overall Rating
Scheme Options								
R a t i n g	Existing layout	0	0	0	0	0	0	0/18
	Option A (With Pedestrian and Cyclist path along the centre of the carriage-way with integrated SUDS)	3	3	3	2	3	3	17/18
	Option B (With Pedestrian and Cyclist path along existing footway with integrated SUDS)	2	3	2	2	3	3	15/18



# Southend Central Area Transport Scheme (S-CATS Phase 2)

## Engagement and Consultation Plan

Doc. Ref: Comms plan

Version: 04

Date: June 2017



# Project support

<b>Project Team</b>	<b>Krithika Ramesh</b> <b>Justin Styles</b> <b>Chris Styles, Neil Handley, Matt Mills</b> <b>Collette Kemp</b>
<b>Construction</b>	<b>Eurovia</b> <b>TBC</b>
<b>Communication</b>	<b>Media Team</b> <b>Michael Sargood</b>
<b>Policy</b>	<b>SCAAP Policy team</b> <b>Mark Shepard</b>

## Communication objectives

- Awareness: To create general awareness about the planned works.
- Comprehension: To increase stakeholders' understanding of the projects goals and function.
- Information sharing: Establish a process for sharing information between stakeholders about the planned activities.
- Collaboration: To develop the designs for the improvements with maximum participation from all stakeholders and to support collaboration between different teams to enable effective management of the construction.
- Responsibilities: Assign responsibilities for tasks and information dissemination.
- Managing expectation: Early engagement of stakeholders to ensure they understand levels of improvements the scheme will bring about.

## Stakeholder Analysis

Three potential stakeholder groups have been identified:

**Partners:** Local organisations from the community, public and education sector which may be keen to partner with the Council to support or help to promote the concept of S-CATS. This group may also include local groups that are interested in place-making. Partner organisations may also have opportunities to engage residents or other interested parties through their own events and promotions etc.

**Core business:** Individual businesses or groups of business which may not be directly impacted by the work but may want to be kept involved

**Direct beneficiaries:** Businesses, representative groups or organisations likely to be directly affected by the proposed S-CATS concept

### Partners

The Forum/Southend Central Library

Focal Point Gallery

University of Essex (Gateway Building)

South Essex College

Sustainable Motion CIC

Get Healthy Southend

Southend Museum

Beecroft

South Essex Homes

Local schools in the area (Barons Court, St. Helen's, St. Mary's) etc.

Local Walking and Cycling groups

Resident associations (may be linked to South Essex Homes)

Care homes / residential spaces

Mother and Toddler groups

Environmental groups

C2C

The potential partners will require a briefing in person with key representatives to explain the S-CATS scheme, the theory, context and outline designs. Opportunities for promotion and advocacy should be explored.

Any issues and concerns should be picked up and logged/actioned before major public consultation takes place.

# Stakeholder Analysis

## Core Business

Southend Business Improvement District

Southend Business Partnership

Main High Street / Southchurch Road businesses (i.e. those that are not directly affected by the proposed scheme)

The Victoria Shopping Centre

Royals Shopping Centre

The Core Business group should be briefed individually on the outline concepts, theory and context. Any issues and concerns should be picked up, logged and where possible actioned before major public consultations take place. Further meetings to iron out key issues may be required.

## Direct Beneficiaries

Sainsbury's

Odeon

All other businesses / restaurants on the London Road S-CATS area

All businesses on Queens Road, Elmer Approach in S-CATS area

Local Taxi representatives

Those individuals or organisations who were particularly keen to engage (positively or negatively) during the SCAAP consultation period

The Direct Beneficiaries group should be briefed individually on the theory and context for S-CATS, and where necessary some outline concepts put forward. There will certainly be concerns and issues raised which will need to be considered, addressed before consultation goes public. This is an opportunity to gain initial responses from those businesses who will be most affected by the scheme at an early stage.

## Stakeholder Analysis

	<b>Stakeholder group</b>	<b>Section</b>	<b>Event</b>	<b>Date</b>
1.	London Road businesses	All	Focus Group meeting London Road- Road closure	July 2017
2.	Pedestrians	All	London Road- Road closure	July 2017
3.	Sainsburys' supermarket	London Road	London Road- Road closure	July 2017
4.	Cyclists	All	London Road Closure Event	August 2017
5.	Taxis	London Road	Focus group meeting London Road Closure	October 2017
6.	Public Transport users	All.	London Road– Road closure	July 2017
7.	Deliveries	London Road	London Road-Road Closure	June 2017
8.	Motorists		Undecided	August 2017
9.	South Essex College	All London Rd.		June 2017
10.	Forum/ Library	London Road/ Queens Road		June-July 2017
11.	Local residents	All		August 2017
12.	Community and resident groups			July 2017



# Stakeholder Analysis

## Decision Makers

<b>Audience</b>	<b>Desired outcome of communications</b>	<b>Comments/ Notes</b>
Department for Place	Collaborate among themselves and with other teams to ensure efficient and timely delivery of the project.  Resolve on-going management challenges.	
Cabinet	Approve the all design plans and associated implementation efforts.	
Senior Management Team	Approve the all design plans and associated implementation efforts.	
Councillors	Understand the planned improvement works and the benefits it will bring. Support the planned improvements and associated implementation efforts Be aware of the funding liability and associated implications.	
Portfolio Holder	Approve and support the planned improvements and associated implementation efforts.	

# Tools & Techniques/ Timing of Communication Activities/ Roles & Responsibilities

<i>Communication method</i>	<i>Target Audience</i>	<i>Timing</i>	<i>Responsibility</i>
Scheduled meetings/ Reports	<b>Project Comms team</b>	On-going	Krithika Ramesh Collette Kemp
One-on-one briefings	<b>Portfolio holder and councillors</b> Formal route will be through one-to-one briefings. Ad hoc email and telephone calls where necessary from individual members of the Project Team and media team.	Ad-hoc	Content: Krithika Ramesh Collette Kemp Michael Sargood  Approval Paul Mathieson  Distribution: Debee Skinner
Emails	<b>Local MP's</b>  <i>They will be included on the distribution list for stakeholder mail-outs and other key communications.</i>	Ad-hoc	Debee Skinner
SBC intranet	<b>SBC staff</b> <i>Brief messaging and visuals with bulletins/updates.</i>	July 2017	Collette Kemp Debee Skinner
Presentations	<i>To be used for briefings to members, the media and other key stakeholders at beginning and end of project.</i>	July 2017	Paul Mathieson Krithika Ramesh Justin Styles
Press releases	<b>Residents</b> <i>Share key messages and implementation activities.</i>	October 2017	Media Team
Flyer / Poster	<b>At Council, Police station, Court House,the Beecroft and other offices along Victoria Avenue , The Forum, University</b>	October 2017	Collette Kemp
Resident letters	<b>Residents</b>	October 2017	Krithika Ramesh
Stakeholder Group workshops/ Stickyworld	<b>All directly impacted stakeholders</b>	On-going	Krithika Ramesh
Variable-message signs	<i>Share key messages and implementation activities.</i>	Construction phase	Justin Styles
Customer Service Centre	<b>Residents</b> <i>Contact point for comments/complaints– provide script</i>	Construction phase	Collette Kemp Debee Skinner
Social media	<b>Residents</b> <i>Posting of brief messages and visuals on the Council's Facebook and Twitter accounts in an effort to stimulate resident dialogue/engagement.</i>	August 2017	Debee skinner Michael Sargood

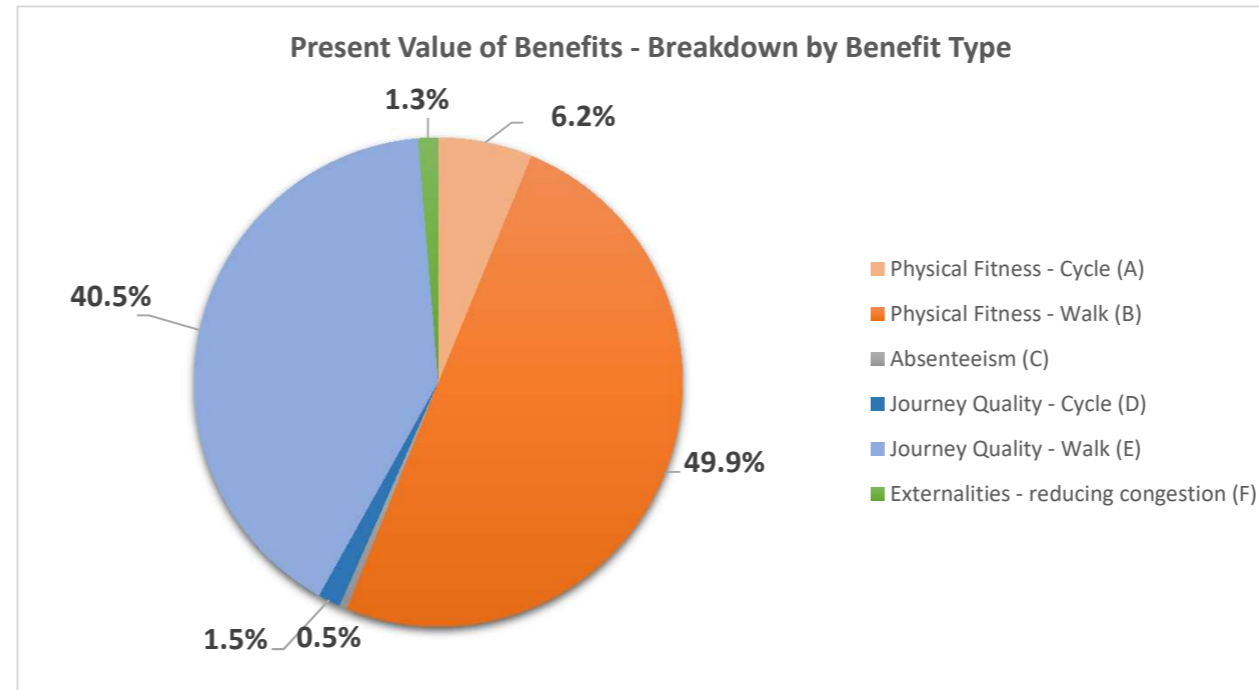
Appraisal Summary Table		Date produced:	21	7	2017	Contact:				
<b>Name of scheme:</b>		S-CATS Phase 2 London Road				<b>Name</b>				
<b>Description of scheme:</b>		Improvements to public realm on London Road between Queensway roundabout and College Way, comprising footway replacement, wide raised crossings, new central reserve with tree planting, footway and segregated cycle lanes, and new LED lighting. Seating and cycle parking will also be provided along London Rd. London Rd / College Way mini-roundabout to be removed. New footway and planting on College Way / Queens Rd, and new footway on Elmer Avenue.				<b>Organisation</b>		Southend-on-Sea Borough Council		
						<b>Role</b>		Promoter/Official		
Impacts	Summary of key impacts	Assessment								
		Quantitative			Qualitative	Monetary £(NPV)	Distributional 7-pt scale/ vulnerable grp			
Economy	Business users & transport providers	No impact on business vehicle journey times or business vehicle operating costs expected as traffic capacity on London Rd and access to all business premises is to be maintained.			Value of journey time changes(£)	0	N/A	0	Not assessed	
					Net journey time changes (£)					
		0 to 2min	2 to 5min	> 5min						
		-	-	-						
	Reliability impact on Business users	No impact expected.				-	N/A	0		
	Regeneration	S-CATS Phase 2 represents the next step in supporting the continued growth and regeneration of the Southend Central Area, by improving the public realm and streetscape on the key western approach for pedestrians and cyclists into the town centre. The improvements are expected to work towards creating the right conditions for employment growth in Southend.				-	Beneficial	N/A		
	Wider Impacts	Phase 2 is a necessary precursor to Phase 3 which is expected to lead to wider economic impacts. Wider impacts for Phase 2 not assessed separately.				-	-	-		
Environmental	Noise	Slight reduction in vehicle trips due to mode shift to walking and cycling will lead to slight beneficial noise impacts. Monetary value estimated using WebTAG Marginal External Costs method.				-	Slight Beneficial	1,092	Not assessed	
	Air Quality	Slight reduction in vehicle trips due to mode shift to walking and cycling will lead to slight beneficial impacts on local air quality.				-	Slight Beneficial	-	Not assessed	
	Greenhouse gases	Slight reduction in greenhouse gas emissions expected due to mode shift to walking and cycling. Monetary value estimated using WebTAG Marginal External Costs method.			Change in non-traded carbon over 60y (CO2e)	-	Slight Beneficial	3,650		
					Change in traded carbon over 60y (CO2e)	-				
		Landscape	No impact expected.				-	Neutral	-	
		Townscape	Scheme will enable sense of place to be restored to London Rd, through well-designed environmental design measures including tree planting to soften the urban environment.				-	Slight Beneficial	-	
		Historic Environment	No impacts expected on any known or potential historic environmental assets.				-	Neutral	-	
	Biodiversity	No impacts expected on biodiversity or geological interests.				-	Neutral	-		
	Water Environment	Reduced surface water discharge expected as SUDS to be implemented as part of the new walking / cycling central reserve on London Rd.				-	Slight Beneficial	-		
Social	Commuting and Other users	Slight beneficial impact on congestion as a result of mode shift from private car to walking / cycling for commuting and other non-business journeys. Will lead to slight reduction in journey times and vehicle operating costs. Monetary value estimated using WebTAG Marginal External Costs method.			Value of journey time changes(£)	-	N/A	102,277	Not assessed	
					Net journey time changes (£)					
		0 to 2min	2 to 5min	> 5min						
			Impact not assessed.				-	N/A	-	
		Physical activity	Increased levels of physical activity resulting from an increase in walking and cycling trips into central Southend. Key scheme components expected to encourage increased cycling are the segregated on-road cycle lanes and additional cycle parking. General public realm improvements expected to encourage increase in walking trips. Quantitative and monetised impact estimated using TAG Units A4-1 and A5-1.			Increase in cycling trips per day: 39 (21 individuals) Increase in walking trips per day: 257 (135 individuals)		Moderate Beneficial	4,778,688	
		Journey quality	Improved journey quality for pedestrians and cyclists, resulting from new on-road segregated cycle lanes, additional cycle parking, upgraded street lighting, reduced kerb level, renewed pavement, seating, directional signage, and tree planting. Monetary benefit estimated using TAG Units A4-1 and A5-1.			Benefits to approx. 150 cycle trips per day and 8,100 walking trips per day.		Moderate Beneficial	3,546,530	
		Accidents	Slight beneficial impact on accidents as a result of reduced car trips on the highway network. Monetary value estimated using WebTAG Marginal External Costs method.				-	Slight Beneficial	16,748	Not assessed
		Security	Improved personal security expected due to upgraded street lighting.			Benefits to approx. 150 cycle trips per day and 5,200 walking trips on London Road.		Sight Beneficial	N/A	Not assessed
		Access to services	Impact not specifically assessed, although no impact expected.				-	Neutral	N/A	Not assessed
	Affordability	No impact on personal affordability expected.				-	Neutral	N/A	Not assessed	
	Severance	Reduced severance on London Rd as a result of carriageway narrowing, new central footway / cycle lanes and wide raised crossing areas.			Benefits to approx. 150 cycle trips per day and 5,200 walking trips on London Road.		Moderate Beneficial	N/A	Not assessed	
	Option and non-use values	No change in availability of transport services.				-	Neutral	N/A		
Public Accounts	Cost to Broad Transport Budget	Includes preparatory, construction and supervision costs, and risk layer. Also includes maintenance costs over the full appraisal period. Optimism Bias at 15%. Real cost inflation on construction costs at 1% per annum for 5 years. Costs paid for through developer funding are removed from PVC and treated as a disbenefit in the PVB.			PVC: £2.08 million NPV: £6.36million (PVB: £8.44 million) BCR: 4.06		N/A	-2,076,831		
	Indirect Tax Revenues	Slight reduction in indirect tax revenues as a result of mode shift from private car to walking and cycling.				-	N/A	-10,754		

**S-CATS Phase 2 London Road**  
Active Mode Economic Appraisal

Southend-on-Sea Borough Council

**Present Value of Benefits (PVB) breakdown by benefit type**

Type	PVB (£ 2010 prices discounted to 2010)	
Physical Fitness - Cycle (A)	524,977	6.2%
Physical Fitness - Walk (B)	4,210,773	49.9%
Absenteeism (C)	42,938	0.5%
Journey Quality - Cycle (D)	126,161	1.5%
Journey Quality - Walk (E)	3,420,369	40.5%
Externalities - reducing congestion (F)	113,013	1.3%
Developer Costs	0	
	<b>8,438,232</b>	
<b>Present Value of Costs (PVC)</b>	<b>2,076,813</b>	
<b>Benefit to Cost Ratio (BCR)</b>	<b>4.06</b>	



# Southend-on-Sea Borough Council

Agenda

Item No.

Report of Deputy Chief Executive (Place)

to

**Cabinet**

on

19<sup>th</sup> September 2017

Report prepared by: Ciara Phipps  
Assistant Curator of Social History

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## Museums Service – Large Objects Collection

Place Scrutiny Item  
Executive Councillor: Councillor Ann Holland  
Part 1 (Public Agenda Item)

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### 1. Purpose of the Report

To acquaint Members with the large object social history collection of Southend Museums Service and set out a future plan for maximising related resources.

### 2. Recommendations

**That following a pre-scrutiny report on 10 July 2017, Members approve proposals for the future of the Museum Service's large object social history collection.**

### 3. Background

#### 3.1 Southend Museums Service's 'large' object collection

Southend Central Museum is fully accredited by Arts Council England and is curated by a professionally trained team.

The museum service currently holds a varied collection of 'large' objects within the social history collection. Given their relevance and importance to the area, the key items within this collection include a complete C.1875 farming wagon, printing presses and all associated equipment from the Padgett print studio, a prototype television and large floor radios included in our extensive EKCO collection.

Over the years, the museum has acquired a number of fireplaces and surrounds with no context or information, damaged domestic wares with no provenance, and replica furniture that has no connection to either of our historic properties. With little or no relevance to Southend, the community, or to our current collections development policy approved by Cabinet in 2014, these large objects are taking up a significant amount of valuable storage space, which could be used for objects that are more appropriate and for better storage of the large objects we currently have and any future acquisitions to the collection.

It is essential to develop and maintain the large objects that will be vital in telling the stories of the area in an accessible, innovative and exciting way in any future displays within the museum service. Given this, it is essential to the care and storage of these objects, that we can fully access each object and add any other relevant and interesting items to the collection when they become available. This is currently not possible given the overcrowding of our storage space with irrelevant or incomplete large objects.

### **3.2 Proposals**

It is proposed that this collection of large objects is considerably rationalised in order to prepare for and focus our collections, in order to adhere to standards of best practice within the museum, in which rationalisation is an essential activity. The museum plans to dispose of objects that are badly damaged, have no relevance to the local area, no research value or significance, and will not be displayed within the museum service. This process will be undertaken according to guidelines by the Museums Association Code of Ethics and the Museums Association Disposals Toolkit. The objects in question will go through the ethical disposal process, which involves using the Collections Trust scoring system to assess each object, formally offering the objects to other museums for acquisition, after which objects can be put up for sale to generate income for the museum stores, and finally if no alternative option is found, disposed of.

This rationalisation would be the first phase of a larger rationalisation project undertaken on the social history collection as a whole, however to begin the process it is essential to start with the largest and most difficult objects to store. If this collection is not reduced in volume, other more relevant and important objects will suffer given the lack of access and space within our current storage facilities to sufficiently care for and interpret them. This rationalisation would provide us with much needed space in order to collect and accept donations of relevant, interesting and important objects into the collection.

### 3.3 The Future of the Large Objects Collection

In the short term, the assistant curator of Social History and the conservator of the museum service are assessing the large objects collection for its condition, relevance, storage needs and for potential future display.

- First action will be to rationalise the collection by judicious disposal. A significant proportion of the large objects collection appears to be unaccessioned and therefore never officially entered into the museum collection. With the original donors consent, where possible, transfer to other registered museums (always the first choice); sale, or in the case of those in particularly poor condition, disposed of.
- In the event of sold items, all funds go towards the conservation and packaging of those that remain and ring-fenced for the on-going work of Southend Museums. They would not be part of any Council budget savings.
- A number of accessioned objects have been identified which are damaged and or irrelevant to the Museum Service's requirements and it is proposed that these too are disposed of. Many of the objects are duplicates and once again have no relevance to the area or the community.
- The Museums Service intends to place notices in the Museums Journal (the museums professional publication) inviting other registered museums to express an interest.
- The medium term plan is for the remaining material to be reorganised and stored in its current offsite store in Tickfield. Here the material will be accessed and engaged with during store tours, curatorial talks, future museum display, and interpretation planning.
- Having the space to move around the objects, care and conserve them more appropriately, and for the public to interact with them, is something this project will facilitate.

### 3.4 Suggested timetable for the large objects rationalisation project

An indicative timetable would be:

September-October 2017	Sorting and listing the large objects. Separation of the objects into accessioned and unaccessioned groups. Moving them all to assess each one.
November 2017-January 2018	Identification of unwanted large objects based on their condition, relevance and their potential for future display. Offer the unwanted objects to other registered museums via the Museums Journal disposals section.

March 2018	Agree next steps of remaining objects.
April-June 2018	Disposal of unwanted and damaged large objects that have not been allocated to different museums or ethically sold.
June-August 2018	Reorganisation of the large objects store to ensure each of the remaining objects can be accessed, condition checked and located.
September 2018	New store tour to the public to encourage visitors to see our newly accessible large objects and 'stars' of the new museum.

At Pre-scrutiny, some Members expressed a wish to see a list of objects identified for disposal before the items are disposed of. The Museum Service will make such a list available during the process.

#### **4. Other Options**

The only alternative option would be to not undertake this project. This would mean we would continue to have overcrowded, inaccessible and inappropriate storage conditions. This option is not suitable given the responsibility the Museums Service has to care for the collections and potentially risks museum accreditation

The success and development of the service will be determined by the large rationalisation project as a whole, which this smaller pilot project falls into. Rationalisation is standard practice within the museum sector and ensures best practice in collections' care. In order to build audiences, care for collections appropriately, and to develop interpretation, it is essential to have organised, high quality and relevant collections, which can be cared for correctly and are accessible.

#### **5. Reasons for Recommendations**

The recommendation is essential to the maintenance and development of the Museums Service and our collections. According to accreditation standards and ethical best practice set out in the Museums Associations Code of Ethics, it is vital to maintain collections for future generations by incorporating responsible disposal into the museums long-term collection development policy.

#### **6. Corporate Implications**

##### **6.1 Contribution to Council's Vision and Critical Priorities**

Part of the Council's vision for a 'better Southend' is to be achieved by having a museum service that is efficiently run and organised, and itself has a clear vision of what it wishes to achieve. These proposals do exactly that. This section of the collections will be more coherently and efficiently organised, focused on the heritage of Southend, more economical to maintain and far more accessible to both our staff and customers. These proposals strongly conform to the Council's Critical Priority 6 'Become a high performing organisation'.



## 6.2 Resource Implications (Finance, People, Property)

At present, the work on the large objects collection is being conducted as part of normal museum activities.

## 6.3 Legal Implications

There are no significant legal issues raised by these proposals.

## 6.4 People Implications

There are no significant issues concerning people raised by these proposals.

## 6.5 Property Implications

There are no significant property issues raised by these proposals.

## 6.6 Consultation

This matter was presented to SBC Members at Place Scrutiny on 10 July 2017 and their considerations have been incorporated into this paper.

We have consulted with SHARE Museums East ChangeMakers network, the head of which was the Convenor of the Museums Association's Ethics Committee and was instrumental in developing new guidelines on the ethical disposal of collections. It was agreed rationalisation is a fundamental aspect of good collections care and management, which would hugely benefit the Social History collection at Southend Museums Service.

After discussions with the Director of Museums for Arts Council England, it was agreed, the importance and value of responsible disposal is vital in improving museum storage, care and interpretation of collections. To care for relevant and important collections, it is imperative we re-home, sell or dispose of any damaged or irrelevant objects that do not fit within our collections development policy.

We have also consulted with the Social History Curators Group network who agreed that rationalisation of large social history collections benefits museums by ensuring current collections are sufficiently accessible, and for the future of social history collecting where relevant.

## 6.7 Equalities Impact Assessment

There are no significant equalities issues raised by these proposals.

## 6.8 Risk Assessment

The main risk is that if we were not to deal with this large collection, the logistics of inevitably having to deal with it in the future, perhaps in a hurry, could seriously affect our capacity to deliver any future content within the service in a controlled way.

## 6.9 Value for Money

Storage is expensive, even if the costs are subsumed in normal revenue expenditure. The potential of paying for external storage in future, for objects that we may want to take in, would be unnecessary if we can clear space in our current stores. Objects that could not be stored due to lack of space would require funding for external storage, if their need for the collections was great enough. This could be negated if this rationalisation project is undertaken.

## 6.10 Community Safety Implications

There are no significant safety issues raised by these proposals.

## 6.11 Environmental Impact

There is a small environmental impact if a number of varied objects are disposed of. This can be reduced by taking the trouble to explore other avenues of disposal (gift, transfer, sale) before physically discarding items. The environmental impact can also be reduced by following council procedures for the disposal of, for example, cathode ray tubes and electronic waste.

## 7. Background Papers

The Following papers were consulted:

SBC Corporate Plan and Annual Report 2015

SBC Corporate Priorities 2016-2017

Southend Museums Service Collections Development Policy 2014 - 2019

Museums Association Code of Ethics

Museums Association Disposals Toolkit

Collections Trust, Collections Management: A guide to selecting a review methodology for collections rationalisation.

## 8. Appendix

Appendix 1 - Images of examples of objects for disposal



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# Southend-on-Sea Borough Council

Agenda  
Item No.

Report of Deputy Chief Executive for  
Place

to

Cabinet

on

19 September 2017

Report prepared by: Lynsey Adams, Project Officer and Neil  
Hoskins, Programme Manager, Major Projects & Strategic  
Transport Policy

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**Highways/Transport Infrastructure Asset Management (HIAM) – An Asset Management  
Approach and Plan for Highway Infrastructure**

**Place Scrutiny Committee(s)**  
**Executive Councillor: Councillor Tony Cox**  
**Part 1 (Public Agenda Item)**

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## 1. Purpose of Report

- 1.1. To provide Cabinet with an update on progress in developing the Council's approach to Highways/Transport Infrastructure Asset Management (HIAM).
- 1.2. To agree of the Highways Infrastructure Asset Management Plan (HIAMP) and supporting documentation set out in **Appendix 1**.
- 1.3. To inform Cabinet of the change of the Council's banding for the next Department for Transport self-assessment questionnaire (SaQ) return.
- 1.4. To agree the approach as set out in the HIAMP which will assist the continued implementation and development of asset management and also support the basis for consistency amongst UK local authorities and therefore the delivery of the benefits associated with asset management.
- 1.5. To agree the Lifecycle Plans which comprise the approach to the maintenance of an asset from construction to disposal and which may be used to demonstrate how funding and/or performance requirements are achieved and through appropriate maintenance strategies For example, the different treatment options and the balance between renewal and routine maintenance; which will assist in setting the priorities for investment.

## 2. Recommendations

### 2.1. Cabinet are recommended:

- 2.1.1. **To agree the HIAMP and appendices as the Council's approach to asset management and operational service delivery.**

- 2.1.2. To agree continued cross boundary joint working on asset management, enabling better understanding and development of collaborative working, benchmarking and efficiency, resilience, customer communications and operational delivery to support the management of assets in Southend-on-Sea.**
- 2.1.3. To note the lifecycle plans which form the basis for the prediction of future performance of a group of assets, based on investment scenarios and maintenance strategies.**
- 2.1.4. To agree that the HIAMP and appendices will influence the Council's approach to highway maintenance and management of assets in order to meet the requirements as set out by the Department for Transport.**
- 2.1.5. To note the increase of the Council's banding for the next Department for Transport self-assessment questionnaire (SaQ) return. The result of which will be the Council will receive it's full funding award and improving the case for additional funding grants by adopting asset management principles.**

### **3. Background**

- 3.1.** In December 2014, the Government announced that £6 billion was being made available between 2015/16 and 2020/21 for local highways maintenance capital funding.
- 3.2.** From that funding, £578 million has been set aside for an Incentive Fund scheme, to reward councils who demonstrate they are delivering value for money in carrying out cost effective improvements.
- 3.3.** Since then, the Government has announced a further £250 million between 2016/17 and 2020/21 to help tackle potholes or stop them forming as part of a Pothole Action Fund and in November 2016, a further £1.1 billion was announced for local roads.
- 3.4.** In January 2017, each local highway authority in England (excluding London) was invited to complete a self-assessment questionnaire (SaQ), in order to establish the share of the Incentive Fund they are eligible for, in 2017/18. This includes those authorities who are currently deemed Band 3 from the 2016/17 round.
- 3.5.** Each authority will score themselves against 22 questions, and place themselves into one of 3 Bands on the basis of the available evidence.
- 3.6.** The Incentive Funding awarded to each local highway authority was based on the score in this questionnaire, and will be relative to the amount received through the needs-based funding formula.
- 3.7.** In 2017/18, only authorities in Band 3 will receive the full share of the £578 million Incentive Fund whilst authorities in Band 2 received 90% and Band 1 authorities 60%. The percentages for Bands 1 and 2 will further decrease in

subsequent years, with only authorities in Band 3 being awarded their full share of the funding.

- 3.8. On the 22 September 2015, the Cabinet received a report on the Transport Asset Management Strategy (TAMS) – Guiding principles and draft action plan. Work to provide a robust framework for managing highway/transport assets and which meet the requirements by Department for Transport (DfT) has been undertaken.
- 3.9. The HIAMP and supporting documents have been produced using the 14 recommendations as set out by the Highways Maintenance Efficiency Programme (HMEP) Guidance, commissioned by Department for Transport (DfT).
- 3.10. HMEP prepared this Guidance for local highway authorities, which is endorsed by UK Roads Liaison Group (UKRLG), to support the adoption of asset management principles and enable implementation of the benefits of long term planning. This will support a more effective and efficient approach to the management of highway infrastructure.

The guidance hierarchy adopted by the UKRLG is shown below:

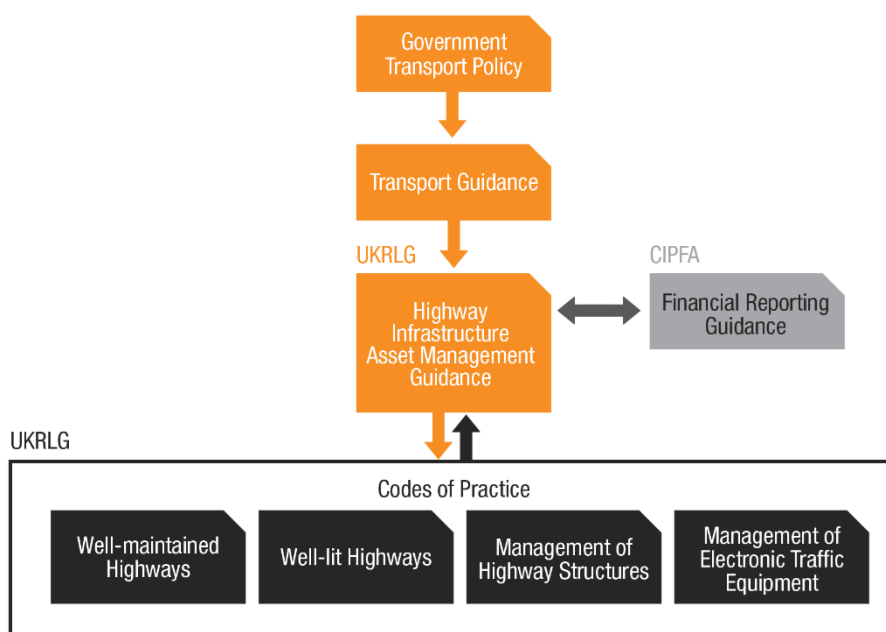
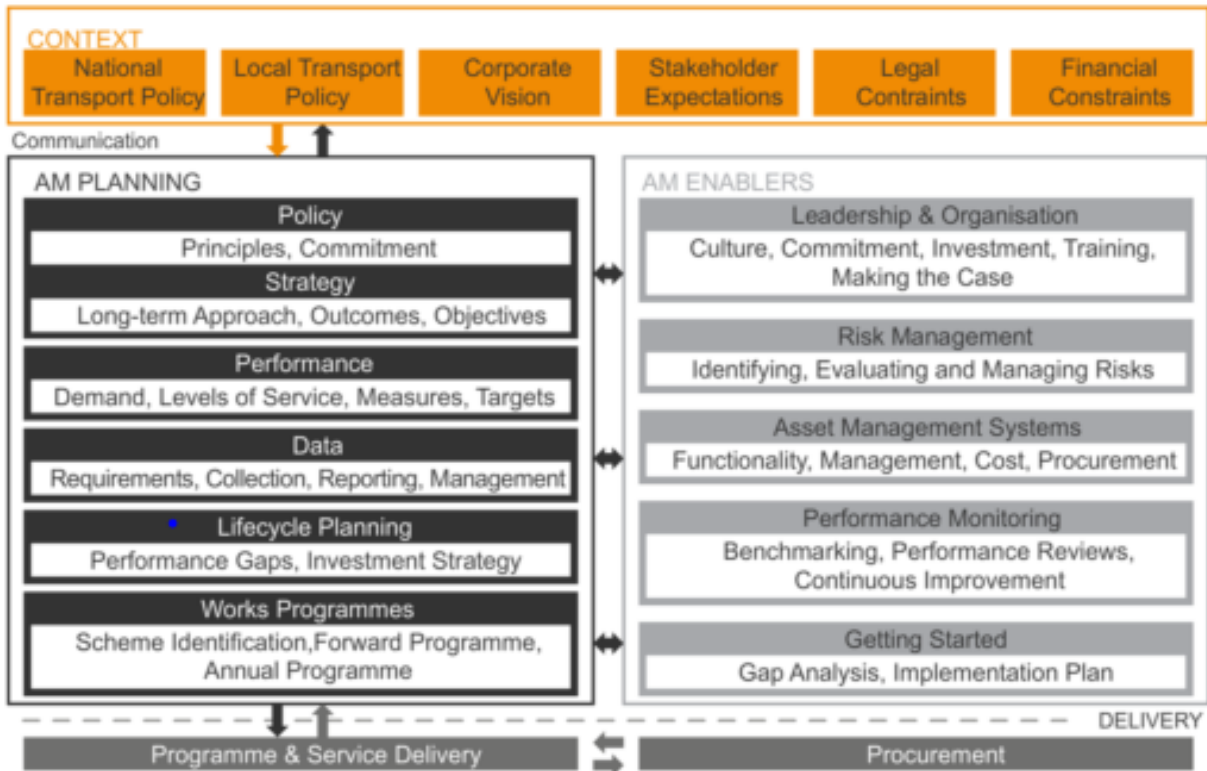


Figure 1 – UKRLG Guidance Hierarchy

- 3.11. Since the TAMS, considerable work has been undertaken to establish a framework for the Council’s Highway Infrastructure Asset Management Plan to achieve the top Band of 3.
- 3.12. Following a ‘dry run’ of the questionnaire in the summer of the 2015, in the return of the SaQ for 2015/2016 and 2016/2017 the Council was assessed to be a Band 2 authority. Following the continuing work of the Major Projects and Strategic Transport Policy Group to meet the requirements of SaQ the Council

can be declared a Band 3 authority for the next submission, expected to be due in the autumn of 2017

- 3.14.** The framework for Highway Infrastructure Asset Management sets out the activities that support asset management and with processes necessary to develop, document, implement and continually improve asset management. Asset Management Framework taken from Highways Maintenance Efficiency Programme (HMEP) Guidance:



- 3.15.** Apart from the Highways Infrastructure Asset Management Plan (HIAMP) the framework comprises of Asset Management Policy and Strategy, Setting and Measuring Performance, Asset Data, Lifecycle Planning, Works Programmes, Asset Management Leadership and Organisation, Risk Management, Asset Management Systems, Performance Monitoring and Implementation.
- 3.16.** Lifecycle planning principles for assets should be used to review the level of funding, support investment decisions, prioritise and substantiate the need for appropriate and sustainable long term investment.
- 3.17.** Development and use of lifecycle plans will demonstrate how funding and performance requirements are achieved through appropriate intervention (treatment option) and investment strategies, with the objective of minimising expenditure while providing the required performance.
- 3.18.** Lifecycle Plans for critical assets include Carriageways, Traffic Signals, Street Lighting and Structures. Further work is required to complete Footways and Drainage plans.



#### **4. Other Options**

- 4.1.** Do nothing and settle for a lower band score (Band 2). However, this would mean that the Council has no credible strategy for investing in assets and resulting in a significant loss of external funding for maintenance equal to £70k-£163k through to 2020/21 This would also affect the Council's reputation as other local authorities across the UK adopt the approach, develop and use collaborative working to do so.

#### **5. Reasons for Recommendations**

- 5.1.** This report provides an overview of the work undertaken to establish the Council with a framework which has the means to deliver a more efficient and effective approach to management of highway infrastructure assets. An appraisal of the HIAMP and appendices will benefit from Member involvement, engagement and support.

#### **6. Corporate Implications**

##### **6.1. Contribution to Council's Vision & Corporate Priorities**

- 6.1.1.** The HIAMP and appendices support the delivery of the Council's Vision and Corporate Priorities.

##### **6.2. Financial Implications**

- 6.2.1.** The Council will lose up to 30% (equal to £70k) of the Incentive Fund allocation from the Department for Transport (DfT) if it does not continue to implement and improve on the asset management at Band 3 through to 2018/19 The percentages for funding allocation for Bands 1 and 2 will further decrease in subsequent years, with only authorities in Band 3 being awarded their full share of the funding.

##### **6.3. Legal Implications**

- 6.3.1.** The Council has statutory obligations to maintain the highway and the HIAMP is an integral part of delivering this obligation.

##### **6.4. People Implications**

- 6.4.1.** The level of resources to ensure that the HIAMP can be maintained will be reviewed.

##### **6.5. Property Implications**

- 6.5.1.** The Council has an obligation to ensure it maintains its highway assets.

##### **6.6. Consultation**

- 6.6.1.** There will be a Member drop in session arranged where the HIAM framework, HIAMP and various aspects of it's associated policies and strategies will be consulted upon.

**6.6.2.** A Stakeholder Engagement and Consultation Plan will be devised and implemented.

**6.7.** Equalities and Diversity Implications

**6.7.1.** Different user groups have different needs and part of the development of the final HIAMP will be subject of a full equality analysis as part of the Stakeholder Engagement Plan. It is important that the Council's assets are maintained in a condition that meets the needs of all its residents and the HIAMP and supporting documents will assist in this.

**6.8.** Risk Assessment

**6.8.1.** This forms part of the HIAMP which is an integral part of the risk based approach. The key risk is that the Council will lose a significant level of incentive grant funding for the Department for Transport if it does not retain Band 3.

**6.9.** Value for Money

**6.9.1.** The HIAMP documents the asset management process to provide clarity and transparency and to ensure the highway infrastructure is efficiently maintained and that investment is targeted to ensure the assets are maintained in their optimum condition.

**6.10.** Community Safety Implications

**6.10.1.** Understanding the Community Safety impacts and maintaining the highway efficiently is a key part of the HIAMP, particularly in respect of the developing investment plan, highway inspection regimes and managing reactive maintenance.

**6.11.** Environmental Impact

**6.11.1** Well maintained and accessible highway infrastructure is vital and fundamental to the economic, social and environmental well-being of the community. Environmental impact will be considered in the effective re-use of materials, sustainability of the supply chain, flood risk and managing surface water systems, low energy lighting systems and ensuring that corporate policies are considered alongside the HIAMP.

**7. Background Papers**

TAMS Report to Cabinet on 22 September 2015, Agenda item no. 30.

**8. Appendices**

**Appendix 1 – Highways Infrastructure Asset Management Plan (HIAMP)**

APPENDIX 1

**Southend on Sea Borough Council  
Highway Infrastructure Asset Management  
Plan**

**June 2017**



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## **Executive Summary (or Foreword by Cabinet Member)**

The Council's highway network is estimated to have a gross value of £811 million (April 2014 valuation). The operation and maintenance of this vital asset supports the Council's corporate vision by delivering the agreed level of service to all road users and by providing value for money.

The Council is under increasing scrutiny in the way that it meets its road user expectations, justifies the infrastructure investment and demonstrates how best use is being made of scarce resources.

It has been fully recognised that embedding asset management in the highways service as demonstrated by best practice is fundamental if the highway network is to continue to be 'fit for purpose'. We will be continually challenging and improving our asset management practices and actively seeking out national and international best practice.

The residents of and visitors to Southend expect safe and reliable journeys. The Council are actively engaging with road users and other interested parties to receive and understand their views about the highway service we are delivering.

A key function of the Highways Infrastructure Asset Management Plan (HIAMP) is to set out how we intend delivering an affordable service with the resources available. Our lifecycle plans cover a wide range of activities, from inspections, to routine and cyclic maintenance, and include structural maintenance and more substantial refurbishments and improvements to all the Council's highway assets.

The lifecycle activities set out in this HIAMP are for what we have classed as the critical assets. A number of these activities reflect best practice (for example, inspection and routine maintenance intervals) and are designed to manage the risk levels.

Other activities, such as structural maintenance to carriageways, are periodic in nature and dependent on a wide range of asset condition factors and other criteria. To estimate the maintenance need, lifecycle planning models have been used to reflect how our critical assets behave over time and assist us determine the future investment need.

Setting out the highway infrastructure lifecycle plans in this manner provides full visibility of the activities required to deliver a safe and reliable highway network. It also enables asset owners and senior decision makers to assess and challenge current practices, helping to identify areas where improvements and efficiencies could be made.

The HIAMP sets out financial plans required to deliver the lifecycle activities. The financial plans provide an indication of the level of investment that is required to deliver the agreed level of service for the critical assets. It is also fully recognised that there are considerable pressures on public finances which impact on these financial plans. As a result, we have developed maintenance strategies for our critical asset types in order to make best use of the available funds and ensure that the highway network remains fit for purpose.

### Updating the HIAMP

The Council is committed to continually improving asset management practices and these will be reflected in future periodic reviews and updates of the HIAMP.

# Introduction

## 1.1 Highway Network

The Council's highway network is over 800 km in length comprising of multiple highway infrastructure asset types, such as carriageways, footways, structures (including bridges and retaining walls), traffic signals, traffic signs, highway drainage and street lighting.

It is predominantly urban, covering the length and breadth of the Borough, consisting of strategic and principal (A) roads, non-principal (B&C) roads, unclassified estate, plus a number rural roads and footways. It is vital to the local economy, tourists and the community, carrying high volumes of commercial and private vehicles and in order for the Council to fulfil its potential, it is important that this network is effectively maintained.

The Council has a significant stock of aging highway infrastructure assets built during the post war era from the late 1950s through to the early 1980s, to which many are approaching or exceeded their design/service life, therefore requiring prudent management to minimise interventions and maximise the benefit of the asset.

The urban nature of the Council highway network means it is in constant demand and has to cater for all types of users. The network is crucial for the day to day functioning of the Borough; as a result, the condition and availability of its highway assets is of great importance and value.

The Council is committed to ensuring the highway network is maintained in a manner that supports its corporate vision, aims and objectives.

## 1.2 Highway Infrastructure Asset Management Plan

The Council's Highway Infrastructure Asset Management Plan (HIAMP) facilitates the implementation of good highway infrastructure asset management through a framework approach to deliver the highest service levels with the available resources. The HIAMP will enable the Council to build upon the existing asset management practices and procedures within the authority and create a continuous improvement framework.

The HIAMP will assist in the delivery of the Council's corporate vision, together with its statutory duties, customer expectations and address its funding limitations. The HIAMP has been developed utilising the knowledge, expertise and experience of senior officers and the highway infrastructure teams within the Council, with the support of external consultants; and links the strategic objectives and the operational activities of the authority.

This HIAMP is the vehicle by which the Council intends to provide a long-term highway infrastructure asset management framework that meets their statutory responsibilities and manages the highway assets to a service level that is affordable, achievable, efficient and

cost-effective. The HIAMP links the need for long term highway infrastructure investment and to the Council's strategic goals, risk policy and desired day to-day service levels of service.

Key to the HIAMP is the constant development and review of detailed lifecycle plans for each physical component of the critical highway assets and the corresponding financial planning and spending priorities. This HIAMP provides a framework for asset management improvement as the data collection systems and data analysis improves.

The Council have adopted long-term works programming and for the critical assets whole life costing principles in an effort to ensure that the most economic cost options are identified and used for the works programming and funding decisions.

Key elements of the Council's infrastructure asset management approach, and set out in this HIAMP include:

- Taking a lifecycle approach to the management of critical infrastructure assets;
- Developing cost-effective management strategies for the long-term;
- Providing affordable levels of service and monitoring service performance;
- Managing risks associated with highway infrastructure assets;
- Sustainable use of physical resources;
- Establishing continuous improvement in asset management practices;

The Council's HIAMP has been aligned with the Highways Infrastructure Asset Management Guidance (HIAMG) which is regarded as best practice guidance published by Department for Transport's Highways Maintenance Efficiency Programme (HMEP) and supported by UK Roads Liaison Group. The Guidance makes 14 recommendations and is based around an asset management framework (an adapted version for Southend is at Figure 2.1) approach to aspire to all the benefits from infrastructure asset management.

### **1.3 Scope of HIAMP**

Effective highway asset management requires good quality data, long-term programming and whole life costing models providing cost options which inform the works programming and funding decisions processes. Key elements of the Council's infrastructure asset management approach includes its:

- Asset Management Policy and Strategy;
- Asset Management Communications Strategy;
- Asset Management Performance Management and Continuous Improvement Framework;
- Life-cycle planning approach to the management of critical assets;
- Affordable levels of service;
- Management of highway infrastructure risks;
- Sustainable use of physical resources;

- Continuous improvement in the delivery of the asset management service;

This HIAMP's sets out the processes used for the management of the highway infrastructure assets, highlights the present strengths and weaknesses of the current management approach and seeks ways Southend can improve its asset management service.

## **1.4 Asset Management Framework**

The Council has developed the following asset management framework for all its activities and processes which are necessary to manage, document, implement and continually improve delivery of its highway infrastructure asset management.

The framework is summarised below.



# Southend's Asset Management Framework

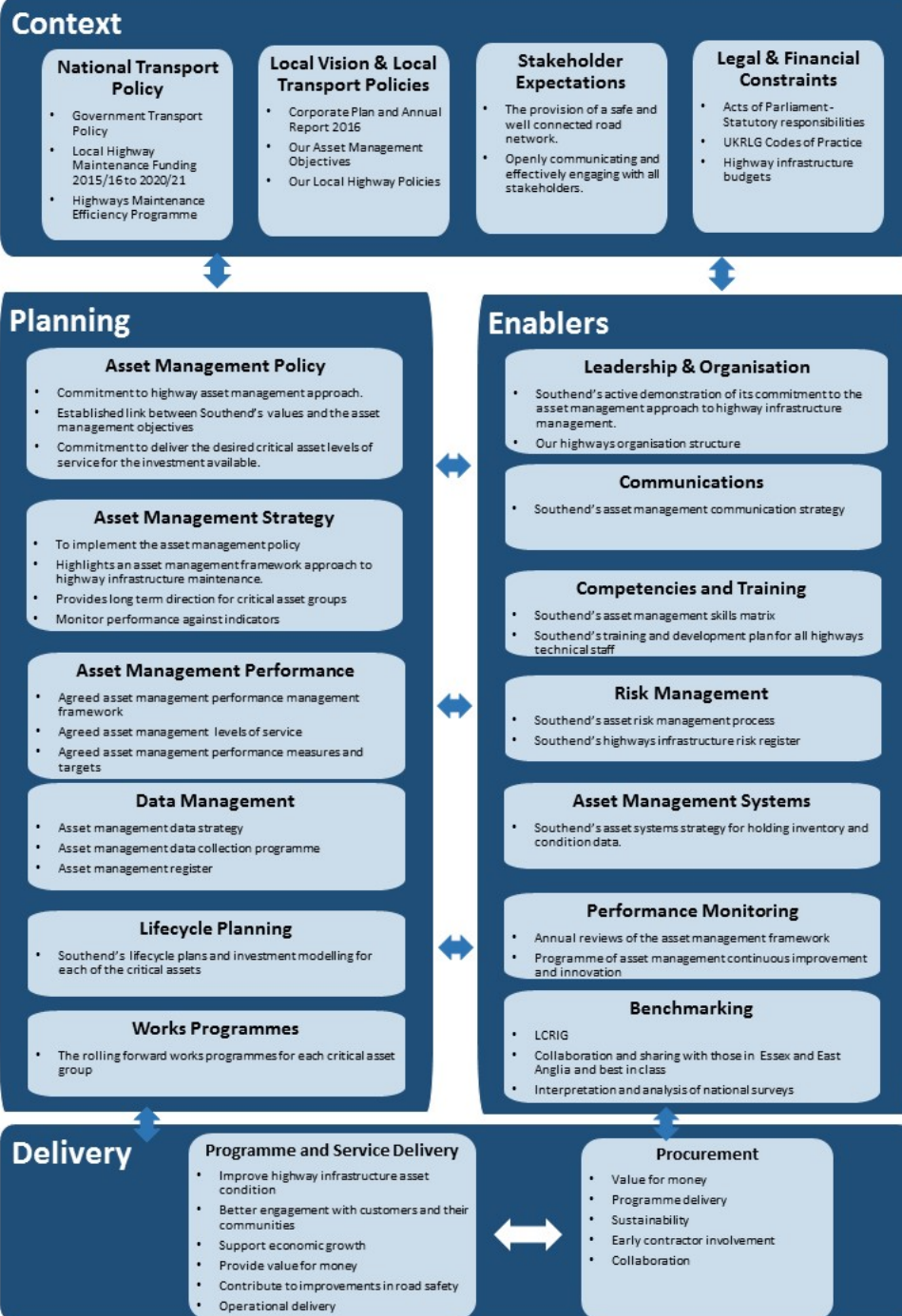


Figure 2.1 -Southend's Asset Management Framework

## 1.5 Asset Management Context

The asset management context includes a variety of relevant and influencing factors that need to be taken into consideration when determining the Council's expectations for the asset management service. These factors include: National transport policy, the Council's

vision and its local transport policies, the expectations of stakeholders together with its legal and financial constraints.

## **1.6 Asset Management Planning**

The asset management planning sets out the key activities that are undertaken by the Council as part of their asset management planning process. These activities include:

- Asset Management Policy – the Council’s published commitment to highway infrastructure asset management and provides the link between the corporate vision and objectives and the asset management objectives;
- Asset Management Strategy – the Council’s published strategy on how the asset management policy will be delivered using the asset management framework, and includes all critical assets, and the Council’s commitment to continuous improvement;
- Asset Performance – the Council’s agreed levels of service and how the performance will be measured, reported, and actions taken to drive improvement;
- Data Management– the Council’s strategy for asset data management and collection, without which informed decisions cannot be made;
- Lifecycle Planning – the Council’s lifecycle plans for the critical assets to inform decision makers about optimum investments and impacts, when combined with investment scenarios and stakeholders desired levels of service;
- Works Programmes – the Council’s programme of works for each highway infrastructure critical asset;

## **1.7 Asset Management Enablers**

Asset management enablers are the series of supporting activities that facilitate the implementation of the asset management framework. They include:

- organisational asset management leadership linking councillors, chief officers, asset owners, and all asset management staff;
- adoption of an asset management culture;
- effective communications with all asset management stakeholders;
- collaborating with all asset management stakeholders and suppliers to deliver an effective service;
- staff with appropriate asset management competencies and skills within the service;
- effective risk management processes for all critical assets;
- data management strategy;
- asset management performance framework;
- benchmarking asset management best practice with neighbouring highway authorities and best in class;
- collaborating with other highway authorities within Essex and the wider East Anglia;

- fostering a culture of continuous improvement and innovation in asset management practices and in works delivery;

## **1.8 Relationship to Other Documents**

This HIAMP provides the linkage between the corporate vision and objectives and the detailed highway operational and business plans.

Other relevant key documents are:

- Highway Asset Management Policy and Strategy;
- Local Transport Plan 3 (2012 – 2026) (Revised 2015);
- Southend Borough Council Corporate Plan and Annual Report 2016;
- Performance Management and Continuous Improvement Framework 2017;
- HMEP Highways Infrastructure Asset Management Guidance (2013);
- Well Managed Highway Infrastructure – A Code of Practice. (2016);

## **1.9 Key Stakeholders**

The highway network and all its individual elements is the Council largest and most valuable asset and in 2014 was valued at £811 million. Good management of these assets impacts directly on a broad range of stakeholders and users of the network including:

- Elected councillors;
- Council officers;
- Residents;
- Road, whether residents, those passing through or visitors;
- Statutory undertakers;
- Local businesses;
- Visitors/tourists.

The information generated by a HIAMP is designed to enable greater involvement by all stakeholders in the management of the highway infrastructure.

## **2. Asset Management Policy and Strategy**

BS ISO55000:2014 (Asset Management) provides a succinct definition of asset management:

*“Asset management enables an organisation to realise value from assets in the achievement of its organisational objectives”*

The Council highway network is a fundamental part of the authority’s highway system and it is essential that it is effectively managed and maintained. The asset management framework approach aims to provide the process to improve the management of the highway assets ensuring the Council meets the needs of the community, while providing

support to the changing demands of businesses and supports the growth of the local economy.

In order to achieve this we have aligned the Highway Asset Management Policy objectives and delivery priorities with the corporate values and objectives. The Asset Management Strategy has been developed to deliver the Highway Asset Management Policy.

## **2.1 Asset Management Policy**

The AMP is a high level document which establishes the Council's commitment to highway infrastructure asset management and demonstrates how the highway asset management objectives align with the Council corporate values and objectives. The Policy gives the asset management stakeholders visibility of how asset management supports the delivery of the corporate vision.

## **2.2 Asset Management Strategy**

The Highway Asset Management Strategy is the Council's primary highway asset planning tool to ensure that the Highway Asset Management Policy is delivered and supports the wider objectives in the Corporate Plan.

The HAMS fulfils the following functions:

- It sets out the contribution to the wider objectives in the Corporate Plan, the Local Transport Plan and other strategies and plans at the local, regional and national level through the prioritisation of investments in maintenance of the highway infrastructure.
- It establishes the Council approach to prioritising, mitigating and managing critical risks associated with the highway network and ensuring that the network is resilient to major incidents such as extreme weather.
- It identifies, and where possible, quantifies the long term strategic highway asset planning risks that will affect the Council ability to deliver highway services in a sustainable fashion. These risks include construction price inflation, climate change and continued reductions in Central Government funding and the strategic actions that are needed to mitigate or manage these.
- It identifies the most cost effective way of achieving all of the above using forecasting models to enable the Council to select investment strategies and models to different maintenance activities that should minimise costs over the long term.
- It will form the basis of future LTP funding as the Government expects local authorities to have strategies and plans in place to justify future bids.

## **3. Levels of Service**

The levels of service are developed for an asset, categorised under the service groupings and can be used to evaluate and measure performance.

Levels of service are:

“the agreed service quality for a particular activity or service area against which performance can be measured. Service levels usually relate to quality, quantity, reliability, responsiveness, environmental acceptability and affordability”.

Levels of service can be developed from both asset condition (existing / desired) and demand aspirations (i.e. what the asset is expected to deliver).

### **3.1 Why Use Levels of Service?**

Levels of service are an integral component of the asset management process. They are used to define service delivery levels (or service options) for each asset type. The level of service are part of the criteria used to prioritise maintenance schemes, to monitor agreed performance measures and identify how the level of service are being delivered.

The Council levels of service will be used:

- to develop asset specific strategies to deliver the agreed level of service;
- to identify the costs and benefits of the agreed levels of services;
- as a measure of the effectiveness of the HIAMP.

Future developments of this HIAMP will seek to consult with customers of the proposed type and level of service to be offered and whether these align with the individual's expectations.

### **3.2 Current Practice**

The Council adopted its Highway Maintenance Strategy in 2015 and it includes performance indicators (local and National) by which service delivery can be measured. The adoption of these performance indicators allows a greater level of accuracy and sophistication on the asset management performance.

### **3.3 Development of Levels of Service**

This HIAMP contains initial target levels of service for each asset type and has been developed by considering the key factors that impact on both the operational and maintenance of each asset type. These target levels of service may include condition, demand or both.

The actual levels of service are determined through consultation with asset management stakeholders and includes legislative requirements, customer expectations, Council's corporate goals and objectives and best practice guidelines. In addition to these, levels of service will vary from asset type to asset type.

The initial levels of service were based on current practice and will be the subject of continuous monitoring and development. Annual reviews will be undertaken in order to review actual performance against targets.

## **4. Measuring Performance**

### **4.1 Performance Management Framework (PMF)**

The purpose of the asset management PMF is to support the Council in delivering its asset management priorities through a robust, transparent and repeatable process for recording, monitoring, analysing, and reporting performance for all its critical infrastructure assets.

A PMF, that links strategic and operational criteria, is fundamental to a holistic asset management approach. It enables the Council to assess and demonstrate the impact that different investment scenarios will have on the performance of the infrastructure network, levels of road user satisfaction, engineering/contract measures and condition targets.

In particular the PMF can:

- demonstrate actual performance against targets to all asset management stakeholders
- show the effectiveness of the spend on infrastructure assets

### **4.2 Importance of Performance Management**

Successful asset management delivery requires the ongoing monitoring of performance in order to ensure that the agreed levels of service are being delivered. Performance management is important to the Council as it provides the ability to:

- Document the differences between actual and planned performance and identify the reasons for any differences;
- Prioritise and allocate diminishing resources effectively;
- Ensure value for money;
- Motivate and engage competent staff, and assign accountability;
- Identify and rectify poor performance at an early stage;
- Learn from past performance to help improve future performance;
- Increase public satisfaction and help improve services for service users;
- Implement action strategies to adapt performance.

### **4.3 Performance Monitoring**

The performance of the highways service is benchmarked against a series of asset management performance indicators for the critical assets initially, with the intention of including the non-critical assets in time.

The asset management performance indicators assess the inventory data quality and coverage for each asset type identified and will be benchmarked against the 5-year action plan and improvement targets developed from the gap analysis.

Robust, high quality inventory and condition data allows the Council to monitor the impact of the HIAMP and review and implement changes if required.

## 5. Asset Data

The availability of good quality inventory data, condition data and supporting information is essential for asset management decision making. This requires the collection, and maintenance of robust, good quality asset data to analyse and report against present asset performance and the monitoring of progress towards achieving asset management targets.

The Council recognises that data is expensive to collect, analyse and maintain, therefore it has implemented a Data Management Strategy to help prioritise its capital funding for its works programmes and provide supporting evidence of its legal responsibilities. Condition of an asset generally relates to its structural integrity and is a key driver for future maintenance and renewals work.

### 5.1 Types of Data

The following asset data types are required:

- **Inventory:** - information on the quantity, location, size, type, age and key components make up of each asset component;
- **Condition:** - quantified and/or observed, a condition rating for a component or whole assets derived from either physical testing, machine based analysis or visual inspection;
- **Use:** - information on the use of assets in the form of information such as traffic counts, heavy vehicle routes, road classification etc.

Good asset data is the foundation on which all asset management processes are built; the availability of appropriate asset data allows all staff involved in the process to obtain an overall view and to apply a consistent management approach.

The Council's present position with respect to its key assets (carriageways, footways, structures, traffic signals, and street lighting) has been assessed as good, however it is recognised that there are gaps in the data, which will be addressed by the Data Management Strategy.

Asset data is required to support the following:

- effective monitoring of, and reporting on, the condition of critical infrastructure assets;
- life expectancy, before intervention of individual assets or asset components;
- asset management levels of service;
- asset management performance indicators;
- future investment scenarios;
- long-term forward works programmes and lifecycle planning;
- valuation assessments for each of the infrastructure assets and any calculation of asset depreciation.





## **5.2 Current Asset Data**

The Data Management Strategy includes an analysis of the extent and reliability of the current asset data held and how to identify the existing data deficiencies. It is accepted that there is insufficient asset inventory data for some of the asset groups, most notably highway drainage.

The quality and quantity of the present inventory and condition data varies from asset group to asset group. Details of what data is currently available is discussed in more detail in each individual asset lifecycle plan (see Appendix D).

# **6. Data Management**

## **6.1 Current Data Management Practices**

The Data Management Strategy provides the current process and procedures to assess and validate the consistency, quality and completeness of data. Additionally, the Data Management Strategy outlines consistent processes and procedures for updating data. A robust Data Management Strategy ensures data is high quality, accurate with little or no gaps and provides high confidence in outputs derived from the data.

The inventory management procedures should include, inter alia, the following:

- Named asset owners responsible for the data for each asset group;
- Inventory verification/validation procedures;
- Updating and refreshing of data collection methods;
- Updating procedures for new works;
- Interaction with highway safety and other highway inspectors;
- Methods for updating the inventory;
- Identification and adoption of appropriate software.

The Council has a number of procedures in place for elements of the data, and is developing its Data Management Strategy to ensure data consistency. The Data Management Strategy will include validation procedures, quality standards and procedures.

## **6.2 Inventory and Condition Data Use**

Inventory and condition data is required to support the following activities:

- Maintaining the highway inventory; so that we know accurately the extent of the highway assets being maintained;
- Routine maintenance management; so that we can demonstrate that safety inspections and reactive repairs are completed in accordance with the approved highway policies;

- Customer queries and service requests; enabling us to track customer queries and demonstrate that we have responded in accordance with our customer care requirements;
- Performance reporting; to monitor performance to a range of stakeholders in accordance with the performance framework.

Once fully implemented, the Data Management Strategy will improve the quality of asset data and it will assist in the development of our highway management practices. The improvement in asset data management will enable improved capability to:

- predict future needs; thus creating better coordinated and more cost effective plans;
- meet future Government requirements for asset valuation
- understand the risks associated with managing the road network, therefore allowing it to manage it better

In simple terms better data management will enable better and more informed decisions about our road network to be made, therefore providing a better value service.

## **7. Lifecycle Planning**

Lifecycle plans demonstrate how investment and/or performance are achieved through appropriate maintenance strategies with the objective of minimising expenditure, and providing an agreed and affordable level of service over time.

Lifecycle planning can be applied to all highway infrastructure assets, however, application of lifecycle planning may be more beneficial to those assets that have the greatest value, require considerable maintenance investment, are high risk and/or seen as critical assets. In some cases, complex approaches may be appropriate and in these circumstances higher quality data and predictive modelling techniques will also be needed.

The benefits of lifecycle planning include the ability to support decision making through:

- long term investment scenarios and the development of appropriate maintenance strategies;
- the determination of the level of investment required to achieve and agreed level of service;
- the identification of future asset performance for different levels of investment and maintenance strategies.

### **7.1 The Lifecycle Planning Process**

The Council is committed to implementing and maintaining a lifecycle planning approach to the maintenance of all critical highway infrastructure assets.

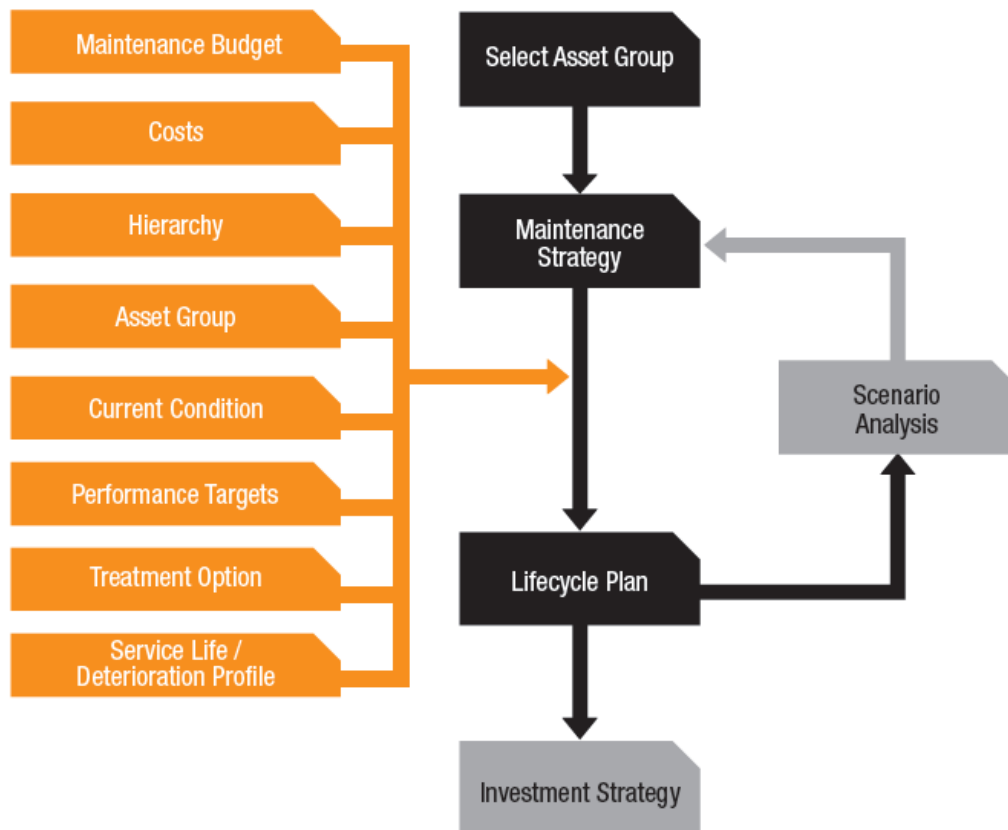
It is presently proactively developing lifecycle plans for most of its key assets including carriageways, footways, structures, traffic signals and street lighting

The outputs from the lifecycle planning scenarios will inform the Council forward investment decisions and support the case for highway asset investment. Outputs will feed into the Council's Performance Management Framework, influencing 'what if' questions such as 'how much budget is required to achieve the desired levels of service?', and, 'what level of service is affordable given the available budget?'

Figure 7.1, below, illustrates a lifecycle planning process that compliments a highway authority's Asset Management Policy and performance management framework. Development of a robust, realistic lifecycle planning process requires reliable and good quality asset data. This is using good practice including the HIAMG and the Institute of Asset Management's Asset Management Anatomy.

The Institute of Asset Management developed the Anatomy to provide an appreciation of asset management: what it is; what it can achieve; the scope of the discipline and a description of the underlying concepts and philosophy, and it aligns with ISO55000 Asset Management.

Figure 7.1 –Lifecycle Planning Process, HMEP Asset Management Guidance, figure 4, page 44



## 8. Work Programming

### 8.1 Introduction

The Council aspire to move towards a long term holistic forward works programme (FWP) which optimises whole life costs and integrates the individual asset type FWP's. The benefits of a long term holistic FWP are:

- Construction and operational efficiencies;
- Coordination of works leading to a reduction in possible congestion;
- reduced disruption to the public;

### 8.2 Current Works Programming

All of the asset types have individual work programmes covering more than one year, with support for a 3 year outline programme.

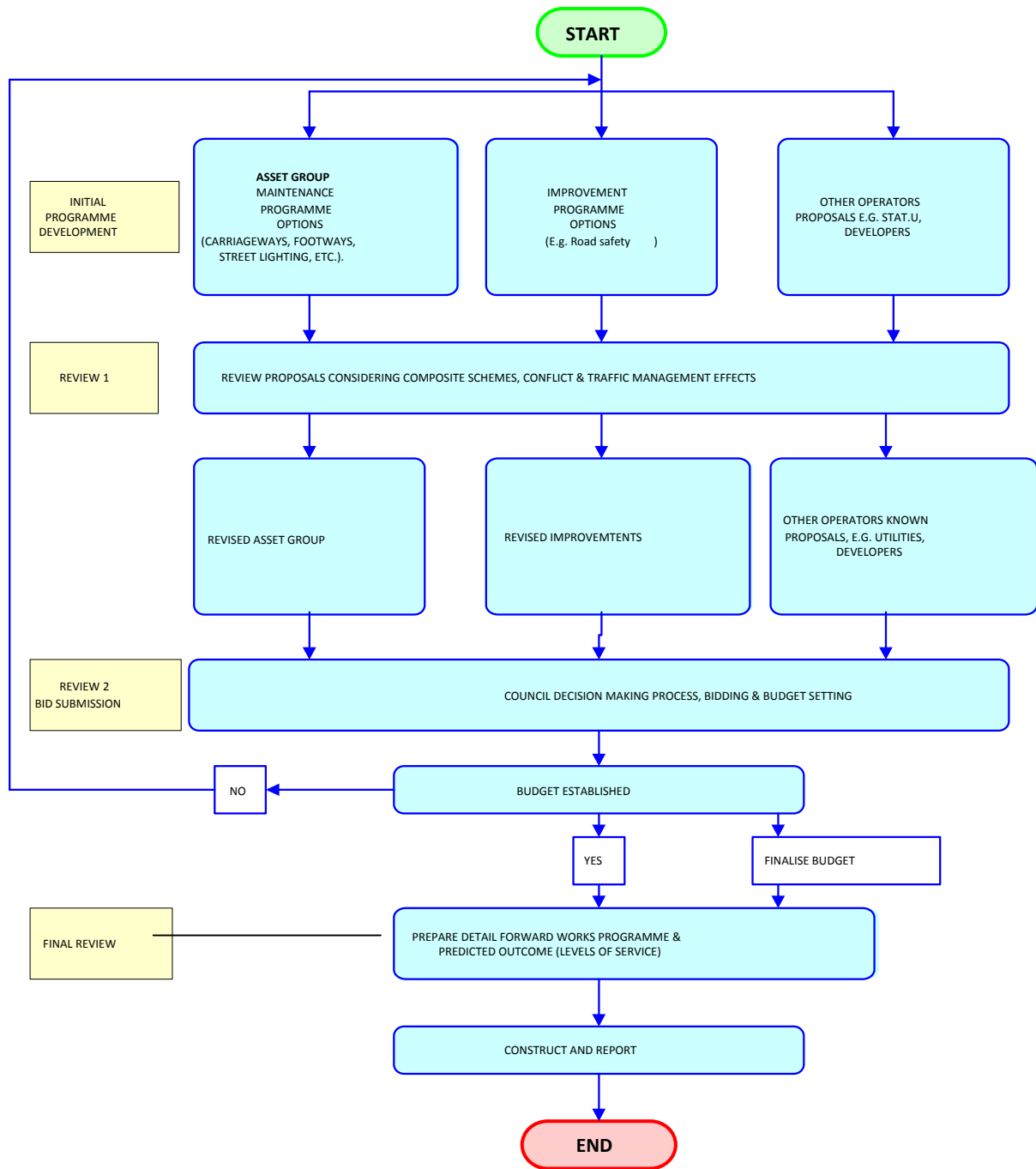
The individual asset type maintenance programmes are developed from asset condition data, priorities and budgets, resulting in a single year detailed programme of work. Carriageway maintenance projects are prioritised from reviewing the current network

condition using survey data (CVI, DVI, SCANNER and SCRIM condition surveys) processed through a Pavement Management System.

Lists of proposed schemes are developed for the different asset types – carriageway, drainage, footways, street lighting, safety schemes, and structures.

Co-ordination of these programmes relies on reviews of work planned for the year, finalised after the Council budget setting process. The adoption of a longer term work programme of, say 5 years, will support greater efficiencies in co-ordinating works on the highway. In addition, it will facilitate the identification of more cost effective solutions.

The current work programming process is shown below in figure 8.2:



**Figure 8.2 Annual Forward Works Programme Process**

### **8.3 Development of a Forward Works Programme**

Adoption of a 3 or 5-year forward works programme will support greater efficiencies in co-ordinating works on the highway and facilitate the identification of more cost effective solutions.

The Council proposes to develop a FWP process based on figure 8.3, below:

**Figure 8.3 – Developing a Programme of Works, HMEP Highway Infrastructure Asset Management Guidance, Figure 6, Page 53**



The Council will investigate whether to adopt a Whole Life Cost (WLC) and Value Management (VM) approach to develop and prioritise the FWP and the selection of the annual maintenance programme. The Council aims to have implemented a 3 or 5-year FWP by 2022/23. The FWP will be developed based on affordable and realistic levels of funding, and this will be reviewed if the actual funding levels available differ.

### **8.4 Scheme Condition Accuracy**

The accuracy of each scheme's condition within the FWP will vary, depending on the time period that the scheme sits within the wider programme:

- **Year 1** – current financial year, work programme already agreed;
- **Year 2** – next financial year, recommendation of works for next round of funding. These schemes should stand scrutiny for economic viability and a genuine need for delivery before they become year 1 schemes.
- **Year 3 to Year 5** - represent a reasonable assessment of likely need, which will include condition and treatment solution options, to be confirmed as the schemes move up the programme.
- **Year 6 to Year 10** - are a best assessment based on age, design life, and condition and residual life. In future, these will be supported by the outputs from asset deterioration modelling.

The accuracy implications of the above assessment are shown in the following table.

<b>Accuracy of programme items</b>		
<b>Years</b>	<b>Subjective Description</b>	<b>Treatment or Scheme Definition Level</b>
1	Scheme will be implemented in year	Actual treatment
2	Firm recommendation	Specific treatment or scheme
3-5	Reasonable assessment	Treatment or scheme type
6-10*	An assessment of long term funding need	Generic treatment
* These years' schemes will require treatments and will be reviewed annually and will move according to scheme condition and funding levels.		

The forward works programme is developed from the data available, however as a result of data gaps and numerous variables, assumptions have to be made based on local engineering experience and expertise. It is not possible, therefore, to predict accurately the precise condition of an asset at any point over a 10 year period, however, it is possible and desirable to predict the scale and types of treatments needed to be carried out in future years on a network wide basis. Such predictions are necessary in order to identify long term future investment need and as a key input into asset valuation.

## **8.5 Current Work Programmes**

### **8.5.1 Carriageways & Footways:**

Current programmes of schemes generally cover a 12 month period with indicative schedules for a further 12 months. The programmes are based on the results of the various condition surveys and engineering inspections, with preparatory software formulating future programmes. It is expected that similar datasets and process will be used to generate a 5-year forward works programme.

### **8.5.2 Highway Structures:**

A 2-year forward works programme has been put in place for all routine maintenance operations. The aim is to produce a 5-year FWP for highway structures using inspection results, estimates of life cycles and the age profiles of critical components. Greater use is to be made of bridge condition indicators (BCI) and the information generated from these.

### **8.5.3 Street Lighting - Programmed Replacements:**

The forward works programme of replacement and improvement works has been driven by the LED replacement programme.

### **8.5.4 Signs and Safety Fences:**

A works programme for safety fences is produced annually. Works for signs and pedestrian barriers are not programmed, however maintenance is conducted on these assets if required and are within the boundaries of a major maintenance scheme.

### **8.5.5 Traffic Signals & Pedestrian Crossings:**

There is currently no annual programme of renewals and replacements. Works are identified for replacement/alterations as part of long term capital funding.

## **9. Risk Management**

Risk management supports the approach adopted for making decisions through the asset management planning process and is covered in the Well Managed Highway Infrastructure, Code of Practice and ISO 31000, Risk Management (47).

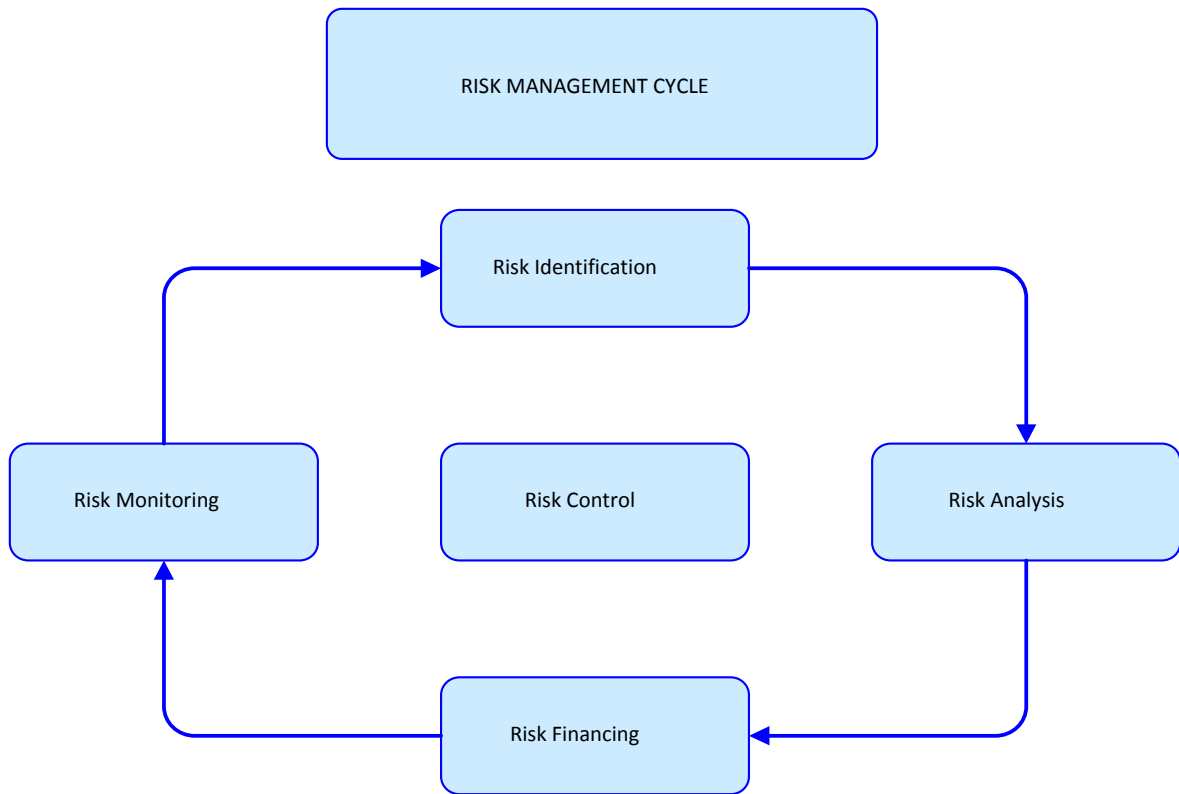
A risk can be defined as an uncertain event which has an effect on the desired performance of an asset or a series of assets. A risk factor is the product of the severity of an event and the likelihood of its occurrence.

Well Managed Highway Infrastructure advises that good risk management requires identification of asset risks, assessing its impact and probability of occurrence. Risk management includes calculating the risk factors, defining the category of risk and timescales to rectify any potential defects to address the risk.



## 9.1 Southend Corporate Risk Management

The Council has an established risk management process, which is illustrated in the following diagram:



**Figure 9.1 Southend Risk Management Process**

## 9.2 Risk Management Process

The aims of the process include:

- Delivery of the Corporate vision and objectives;
- Avoidance of significant loss, damage or injury;
- Avoidance of damage to the Council's reputation;
- Optimisation of the benefits of innovation, and,
- To assist with any anticipated and the management of the consequences of changing social, environmental and legislative requirements.

This process is applied to the highways service.

The steps in the process are as follows:

## 9.3 Risk Register

### 9.3.1 Risk Identification

Each significant activity is reviewed step by step, investigating all aspects of the activity for risks; taking into consideration existing accident records, claim history and national guidance.

As part of this process we have considered each of the following five principal areas:

- **People** – asset management processes, the possibility of human error, and the chance of injury including from stress.
- **Equipment** - all the equipment used, from large machinery in construction to office aids, establishing the hazards associated with their use.
- **Materials** - chemicals in use or formed during work may be subject to assessment under the Control of Substances Hazardous to Health Regulations.
- **Environment** - includes noise, dust, light, ventilation, etc. and may involve effects on the environment from the works. There may, in addition, be issues surrounding the disposal of waste created by any of the processes.
- **Security** – Consider how we can protect vulnerable employees (especially lone workers), equipment, plant and premises from loss, damage and injury. The mobility/portability of items may require different treatments; if in doubt officers should refer to the Council's Risk Management and Insurance Service.

Additionally, the interaction of these five factors need to be considered since the majority of hazards are generally due to a combination of two or more factors. When planning schemes it is necessary to consider how these factors might impact on the delivery of the scheme.

### 9.3.2 Risk Assessment (in the Risk Management Context)

Risk assessment means quantifying how likely a risk is to occur and how damaging the effects will be if it does. Risk is not always bad; without innovation the organisation could stagnate. Risk must be viewed in proportion to the potential benefits of new ways of working, etc. Risk management is about getting the risk/benefit balance broadly right.

There is often confusion with the work based risk assessments required by current health and safety legislation. Although the process used is similar, risk assessment in this context is much wider than simply health and safety; it embraces political, financial, reputation risks as well as those potentially affecting the health and safety of the workforce.

*Risk appetite* is the extent to which the Council embraces risk management rather than tries to control, avoid or transfer it. An example would be the level of excess the Council is prepared to carry rather than to insure.

Combining the likelihood and severity allows the estimation of the significance of the risk and whether further effort is needed to manage it. Proportionality matters: the Council would not normally spend more on controlling risk than it would cost if the related event happens.

### 9.3.3 Defining Risk Levels (Severity)

The severity of a risk event is assessed in the following way:

A **high severity** risk may lead to:

- a fatality
- destruction/loss of essential buildings/resources
- non-provision of a vital service
- ministerial intervention
- prolonged adverse national media coverage over several months
- a big financial loss (say £1m, or enough to threaten the continuity of the service)

This is termed a **level 3** risk or one that will require action by corporate management.

A **medium severity** risk can lead to:

- life changing injury/ill health
- long-term loss of use of essential buildings/facilities
- significant disruption to provision of service
- adverse comments from MP
- some adverse national media coverage
- manageable financial loss subject to control(s)

This is termed a **level 2** risk or one that could be managed by the department.

A **low severity** risk may result in:

- minor injury or ill health
- short-term unavailability of essential buildings/resources
- minor short-term disruption of service provision
- adverse local media coverage
- minor financial loss

This is termed a **level 1** risk or one that could be managed by the budget holder.

### 9.3.4 Defining Risk Levels (Likelihood)

The likelihood of a risk event occurring is assessed in the following way.

**High likelihood:** If the event is very likely to happen in the next 12 months, i.e. a regular occurrence with the loss-causing circumstances arising frequently (daily or weekly). "is very likely to happen" - **likelihood 3**

Medium likelihood: If the event is likely to happen at some point over the next one to two years, i.e. the loss-causing circumstances arise occasionally (a few times a year). "is quite likely to happen" - **likelihood 2**

Low likelihood: If the event has never happened before or has happened but very rarely. "is unlikely to happen" - **likelihood 1**

### 9.3.5 Calculating the Risk (to Prioritise Necessary Risk Management Action)

Of necessity it is appropriate to concentrate on risks that could threaten delivery of an effective service. In order to establish this, the following process is followed:

Multiply the risk level (the severity of the event) by the likelihood to produce an overall score (based on the Risk Matrix shown below in Figure 9.2).

For example, high impact x high likelihood is 3 x 3 = 9.

Likelihood	High (3)	3	6	9
	Medium (2)	2	4	6
	Low (1)	1	2	3
		Low (1)	Medium (2)	High (3)
		Severity		

**Figure 9.2 Risk Matrix**

Action to control risks scoring 6 or more may require inclusion in the departmental or corporate risk register. Mitigating action may reduce risks scoring 3 and 4. For 1 and 2 ratings, there may be no need for immediate action. If the solution is inexpensive and easy it should be undertaken in any event.

Risk level should regularly be re-evaluated to take account of risk management action undertaken to reduce risk and consequent rating.

### 9.3.6 Risk Control

Controlling risk means identifying action(s) to reduce the likelihood, the impact, or both. These actions can be:

- **Preventative:** actions that would stop the event happening or reduce its impact - physically restricting access to hazardous chemicals, insisting on two signatories, implementing authorisation limits, protective equipment, use of sprinklers, etc.
- **Detective:** actions that will detect the event happening in time to allow the individual to stop the worst outcomes occurring - quality checks, alarms, exception reports, accident reports, insurance claims. Best of all is a "trigger event" that tells the individual when the risk is becoming more likely (e.g. statistically, if

graffiti/vandalism is increasing and is not being tackled, it is often followed by serious damage culminating in arson).

- **Directive:** a particular form of preventative control - procedure manuals, guidance notes, instructions, training. These say how to do things safely – but if they are not followed, the risks will still remain.
- **Modifying** risk means changing the activity (or the way it is done)
- **Transferring** risk means using an insurer to cover the cost of damage, or arrangements such as joint working, partnerships or contracting out. However, such arrangements always have a cost and need to be used with caution.
- **Eliminating** risk means stopping an activity because modifying it or controlling it would not reduce the risk to an acceptable level or would be unacceptably costly.

## 9.4 Risk Management Strategy

A Risk Management Strategy usually requires both departmental and corporate risk registers to be reviewed regularly. Items on the corporate risk register should be reviewed as required by the Management Board to ensure that those risks threatening the delivery of Council objectives are actively managed.

The register records an assessment of the potential severity and likelihood of the risk with the current levels of control in place. It then looks at what actions could be taken to reduce or manage the risks further. The risk is then reassessed and a senior officer nominated with responsibility for project managing the agreed improvements.

The revised risk assessment score allows the Management Board, to prioritise risk management action on those risks with the highest scores.

The current Corporate and Directorate Risk Registers are included in Appendix G.

A series of relevant risk registers exist as illustrated below. However currently, no service wide risk assessment has been carried out for all the highways maintenance service. It is intended that this will be undertaken, in line with the process outlined above, as a significant activity within the Council's Improvement Plan.



## 10. Resilient Network

Resilience in the context of the HIAMP is the ability for the highway network to recover from planned or unexpected events and return to providing the required level of service for stakeholders. It is about increasing the physical resilience of highway systems to extreme weather and other events, so when these occur the highway network continues to function.

### 10.1 Department for Transport Resilience Review

In 2014, the Department for Transport (DfT) undertook a review of the resilience of the UK highway network to extreme weather events. This followed a period of extreme weather in 2013/14, which saw high winds and heavy rainfall.

The key recommendation for local roads was:

*“Local Highway Authorities identify a ‘resilient network’ to which they will give priority, in order to maintain economic activity and access to key services during extreme weather. Where Authorities have held formal reviews of the winter’s events, they should ensure that these are enacted; Authorities which were not affected should nevertheless continue to prepare themselves for future extreme weather.”*

This recommendation aligns with the Council’s wider strategies, including the Winter Service Plan, Local Flood Risk Management Strategy, and the Climate Change Strategy for Southend 2020. The Climate Change Strategy sets out our corporate strategy for adaption to the future impacts of climate changes.

The Council detailed methodology for developing resilient highways network is explained in Resilient Network Report issued in 2016.

## 11. Financial Management and Valuation

This section describes the financial implications of this HIAMP. It forecasts the long-term operation, maintenance and capital financial requirements based upon the programmes included in the plan. It is recognised that while there will never be a strategy which warrants zero maintenance, there should be sustainable funding to maintain steady state condition of the asset as a minimum. This should also be accompanied with a clear investment plan which prioritises timely intervention at optimal intervals.

### 11.1 Sources of Funding

Maintenance of highway assets is generally funded from a combination of Capital and Revenue budgets.

**Capital allocations** are made by Central Government through the Local Transport Plan (LTP) process taking into account factors such as road length, classification, traffic figures and road condition data derived from the Road Condition Maintenance Data, published by DfT (Network Condition & Geography Statistics Branch) and from local condition surveys.

**Revenue allocations** are generally funded from a combination of local council tax, business rates, Central Government revenue support and other grants.

The Local Transport Plan settlement is apportioned to both principal and non-principal roads. The non-principal road funds are granted as a block settlement to reduce the maintenance backlog under the Governments 10 Year Transport Plan and are supplemented by revenue funds.

Other sources of funding include Government Grants, and Emergency Capital Funding from Council Reserves and other ad hoc sources.

## **11.2 Highways Maintenance Expenditure**

The highway maintenance budget until recently has been based principally on historical budgets amended to take account of inflation and other influences on the network. Over recent years, however a significant increase in investment has been allocated to highways to provide a stimulus to network asset improvement.

### **How funding need is assessed - Current Practice**

Funding needs for most highway assets is considered using condition assessment information, mainly for carriageways, footways, bridges, safety barriers, trees and street lighting, but there remains some assets where condition information is limited. Further work is required to ensure that this process identifies, in greater detail, the overall funding needed in the medium and long-term.

The current asset management approach for future improvement include;

- Extending condition information to cover all critical assets and to ensure it is fully utilised in decision making;
- A greater consideration of whole life costing with the necessary outcome that the works programmes are able to demonstrate that they are meeting best value principles;
- A requirement for new funding to be increased year on year in line with demands generated by, amongst other factors;
- New adoptions and improvement schemes;
- Increasing pressures from traffic growth;
- Effects of major development projects;
- Changes in regulations.

### **How Funding is Distributed – Option Appraisal**

Allocation of annual funding has been based upon an historic basis supported by whole life costing, condition data, and life cycle planning approach.

The identification of costed options with affordable related levels of service and allows better informed choices to be made. This enables the Council to accurately assess the value of treatments to maintain assets.

Before undertaking this process it is important to identify those options that are unacceptable due to political, social, environmental or economic reasons, and to ensure that robust and fully inclusive levels of service are clearly defined so that the results of the process can be utilised to best effect.

'Initial' option appraisal can be carried out for a single asset or service in order to select the best option in the absence of any other constraints or influences. A 'higher-level' prioritisation, with its greater sophistication, takes into account the competing, and perhaps conflicting demands of the different services and assets across the network.

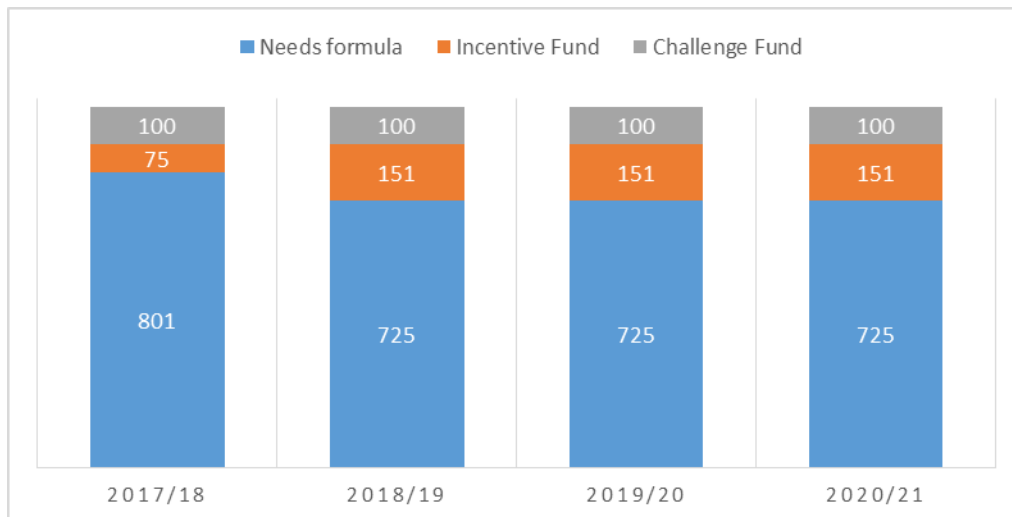
Capital investment on highways infrastructure was just over £15 million in 2016/17 with almost £16 million planned for 2017/18 and £15 million in 2018/19.

### 11.3 Department for Transport (DfT) & Local Government Plans

Since 2006 the DfT has used a formula based approach to deliver both the Highways Maintenance Capital Block and the Integrated Transport Block funding to local highway authorities. From 2015/16, the DfT introduced a new approach to the allocation of the Highways Maintenance Capital Block Grant.

The revised model is now based upon three elements;

- Needs based formula
- Incentive funding
- Challenge fund



**Figure 11 - 3 Local authority highways maintenance funding: 2017/18 - 2020/21**

The DfT set aside £578 million for the incentive fund scheme; and requested that all highway authorities submit a Self-assessment Questionnaire (SAQ) to determine the authority's asset management Band Level. Highway authorities are allocated incentive funding based upon the Band Level determined by the self-assessment.

In January 2016 the SAQ evaluation assessed the Council as Band 2 for the 2016/17 incentive fund allocation, meaning that the Council received 100% of the incentive fund



allocation. If the Council remains in Band 2, the allocation will fall to 90% in 2017/18 and then to 70%, 50% and 30% over the following three years respectively. Achieving Band 3 will ensure that the Council continues to receive 100% of our allocation of the incentive funding in each and every year up to 2020/21. The table below details the funding available based upon our current banding, the last column of the table shows the financial impact of remaining at Band 2 for the duration of the funding period.

	<b>Indicative incentive element by “Band” for self-assessment ranking (£'000)</b>			<b>Loss, if at Band 2 and not Band 3</b>
	<b>Band 3</b>	<b>Band 2</b>	<b>Band 1</b>	
<b>2017/18</b>	116	104	70	12
<b>2018/19</b>	233	163	70	70
<b>2019/20</b>	233	117	23	116
<b>2020/21</b>	233	70	0	163

## 11.4 Future Needs

Demands upon the existing highway network will continue to grow as planned growth areas are developed. Southend’s road network will need to respond to various changes including climate change and the need for increased resilience to adverse weather. This HIAMP, predictive deterioration assessments and future maintenance strategies will need to take these factors into account. Although good progress has been made in recent years in improving overall condition, continued programmes of investment will be required in the future.

## 11.5 Asset Valuation

During each financial year, local authorities have been working towards compiling their Whole of Government accounts (WGA) returns as well as their own Statements of Accounts.

Whole of Government Accounts (WGA) is a set of financial statements for the UK public sector that consolidates the audited accounts of over 1,500 organisations to produce a comprehensive, accounts-based picture, of the fiscal position in any one year.

Up to 2017, local authorities have been recording the value of their highway infrastructure assets at historical cost within their accounts. However, in March 2017, CIPFA/LASAAC, the body responsible for the Code of Practice on Local Authority Accounting in the United Kingdom (the Accounting Code), made the decision not to support WGA for local highway authorities.

The Council has been working to provide depreciated replacement costs for its critical assets and as this work is done and does provide information on its highway asset values.

# Appendices

# Appendix A - Supporting Documents

## Highway Infrastructure Communications Strategy

### • Purpose of the Strategy

The purpose of our Highway Infrastructure Communications Strategy is to ensure that all the asset management communications we provide to our asset management stakeholders, are clear and informative about how we manage our highway infrastructure assets. Whether its performance management information, asset specific policies and strategies or long term investment modelling we want to receive feedback to inform and improve our ongoing service delivery. Our asset management stakeholders includes residents of Southend, interested user groups, our staff, our service providers and their respective supply chain.

We have developed this Communications Strategy so that we can:

- Establish effective lines of communication to be able to engage with our asset management stakeholders.
- Gather asset management customer intelligence so that it can be used to improve our asset management service.
- Improve our relationship and communications channels with our asset management stakeholders
- Demonstrate how we are delivering our asset management policy and thus our Corporate Values.
- Recognise that we have scarce resources and that those resources must be allocated effectively and that in maintaining our highway infrastructure assets we deliver value for money.

In developing this Strategy, it is our expectation that we will:

- Continuously develop and strengthen our highway asset management service through working with our stakeholders.
- Encourage individuals and communities to engage in our desire to improve and develop our asset management service.
- Provide up-to-date highway asset management information on all related matters.
- Demonstrate the effectiveness of our asset management service.
- Provide where required supporting information on why we make asset management decisions, especially when there are conflicting priorities.
- Keep people better informed.
- Highlight the pressures on our asset management service and the tools and techniques we use to deliver the service effectively.

## Strategic Priorities

In 2015 we published our Council Plan and Annual Report setting out the Councils recent achievements, the need to make significant savings and looking forward for the next three years. It also contains our Corporate Values as set out below:

### Living our Values

Our Corporate Values guide how we go about our work. They provide a framework for everything we do from day-to-day activities to key business decisions:

<b>Excellence:</b>	We aspire for excellence in our work
<b>As one:</b>	We work as one organisation responsible
<b>Responsible:</b>	We are all responsible for the performance of our organisation open & honest
<b>Open and Honest:</b>	We are open, honest and transparent, listening to other's views customer care
<b>Customer Care:</b>	Good customer care is at the heart of everything we do
<b>Supportive:</b>	We support, trust & develop each other

To support the successful delivery of our Corporate Values, it is important that we communicate and engage effectively on how we manage our highway infrastructure and includes having in place a clear asset management communications strategy that is aligned with these strategic priorities.

The key communication and community engagement priorities for Southend on Sea Borough Council are to:

- Use the most effective internal and external communications channels in which to invest our increasingly limited resources.
- Focus on being truthful about our highway asset management service and how we will protect the present and future value of the highway infrastructure assets.
- Increase the number of stakeholders who are better informed about our highway asset management service and the number who are more actively involved in commenting on how we develop the service going forward.

### • General Principles of Asset Management Consultations

We will apply some general principles to our asset management consultations.

- There will be open involvement with all regardless of gender, faith, race, disability, sexuality, age and social deprivation.

- We will continue to co-operate with neighbouring boroughs and public bodies to ensure that all our highway asset management matters are appropriately addressed.
- We will seek views of interested and affected parties as early as possible.
- We will choose consultation processes which balance appropriately: cost and time constraints; community impact; and available resources.
- Our consultation and any publications will be clear and concise and avoid unnecessary jargon, without understating the complexities of any decision.
- We will inform those who respond to any consultation of any later stages in the process.

## Asset Management Consultation Database

Over time, we will build up an extensive database of organisations and individuals wishing to be involved in our asset management consultations. Any individual or organisation wishing to be included may be added to the database at any time.

## • The Highway Infrastructure Asset Management Plan (HIAMP)

The various documents that make up our HIAMP for a local highway authority is known as the HIAMP. Our HIAMP contains critical highway infrastructure asset specific policies and data relating to our respective critical asset condition and inventory. These policies are supported by evidence, generally in accord with national policies and affordability which are set out as the affordable levels of service for Southend.

Consultation is required at various stages in the asset management policy preparation,

The following approach applies to our Highways Asset Management Strategy:

### Who we will consult

- Statutory organisations including adjoining councils, infrastructure providers and government bodies whom we consider may have an interest in highway infrastructure asset in Southend. Based on the subject of document we will consult the following groups as we consider appropriate:

Internal	Highway Asset Management Stakeholders			
	Responsible	Accountable	Consult	Inform
Staff	✓	✓		
Elected members	✓			
Other Directorates			✓	

Trade Unions			✓	
Cabinet members/Portfolio holders.	✓			
Scrutiny Committee		✓		
Ward members				
<b>External</b>				
Local road users			✓	
Residents and Communities			✓	
Local businesses			✓	
Local Media (Radio & print)				✓
Emergency services			✓	
Visitors to Southend				✓
Supply chain			✓	
Statutory Undertakers			✓	
Special Interest Groups			✓	
Schools			✓	
Voluntary and community groups			✓	
Adjacent highway authorities			✓	
Department for Transport			✓	
Highways England			✓	

### When we will consult

- Quarterly – Each Quarter, when we produce our Asset Performance Report which will provide information on how we are managing our assets.

- Annually – In April each year we produce our annual report on the condition of our critical assets, the level of funding necessary to keep these assets in the steady state, and the actual level of funding been allocated. It will also set out the implications of the allocated funding long term on our critical highway assets.
- We will consult whenever we update our highway infrastructure asset policies.
- Following the consultation, we will proactively consider the responses received and either update the draft report appropriately then resend out for further consultation before publishing, or where the impact of the responses is minor, publish the report without further consultation.

### **How we will consult**

- When appropriate and helpful we may publish a press release outlining our proposals before we commence consultation.
- We will contact appropriate organisations and individuals directly by post or electronic means.
- We will include with the initial notification either an internet link to the consultation documents on the SBC web site or send out a hard copy.
- We may leave consultation documents on display at locations open to the public such as council offices and libraries.
- We may publicise consultations by methods such as leaflets, newsletters, press releases, public notice, social media, existing forums, community events, public exhibitions, workshops and joining with other consultations where feasible and appropriate.
- All consultation documents will be available on our website, and this will include all supporting documents.
- We may provide a hard copy of a document as soon as reasonably practicable after it has been requested. Documents will be sold at a price reflecting publication costs.
- Consultees will be encouraged to respond to all consultations online via our consultation portal ([www.southend.gov.uk/ldfconsultation](http://www.southend.gov.uk/ldfconsultation)) as this is the quickest and most effective method of responding.
- Response forms will be available electronically. Responses made via letter, email and petition not using the consultation portal format will also be accepted. However, we will encourage all consultees to use our proposed submission template.
- We will explain how consultation comments have been taken into account when the final document is published.
- Arrangements will be made, on request to make all documents available in alternative formats, including Braille, should this be required. All documents will be made available in other languages on request.

### **Delivering our Objectives**

This strategy defines our communication objectives:



1. To ensure that our asset management communications activities are a reflection of the full diversity of our community and there is equality of access to our services
2. We all understand the contribution we all can make and are playing our part.
3. Recognising how we are increasing our efforts to understand what local communities are saying.
4. Give individuals more of a say in the services they receive
5. Listen to our stakeholders to better understand the best, most efficient way of delivering our services and thus satisfy all our customers
6. Provide support to all staff know so they abide by the standards of communication expected
7. To strengthen the reputation of Southend as an effective and efficient provider of high quality asset management services that deliver the agreed values and priorities
8. To ensure that all our communications are consistent and co-ordinated across all channels.

## **Appendix B - Forward Works Programme**

## **Appendix C - Lifecycle Plans**

**Carriageways**

**Street Lighting & Illuminated Signage**

**Traffic Signals**

## Appendix D - Asset Data Analysis 2017

(Excerpt from Southend of Sea Borough Council – Highway Asset Management Strategy (January 2016))

### What are Southend's Highway Assets?

Southend-on-Sea's highway infrastructure assets include:-

- 494km of carriageways and 874km of footways (next to the carriageway);
- 109 bridges, 14 subways and underpasses, 22 retaining walls and 15 large culverts (>1.5m width);
- 22,630 road drainage gullies
- 14,290 street lights, 3,004 illuminated signs and 833 illuminated bollards
- 196 traffic signal junction approaches and 172 pedestrian crossings
- 4,414 non-illuminated signs and 10,240 non-illuminated bollards

They collectively comprise the most valuable assets under our stewardship with a gross value of £811M (in 2014).

The term 'highway asset' is used to refer to highway and traffic management infrastructure because they provide important economic, social and environmental services and benefits to people living, working and travelling in Southend. As with all assets they require careful management to ensure that they continue to provide these benefits at the least possible cost.

## Appendix E - Improvement Action Plan

### Asset Management Improvement Action Plan

Action	Timescale	Review
<b>Asset Management</b>		
Complete the modelling and appraisal of investment options for carriageways	Autumn 2015	Autumn 2018
Development of investment models for footways	Autumn 2017	Autumn 2018
Develop Asset Information Management Plan	Spring 2016	Spring 2018 Annual review
TAMS Policy, Core Strategy, Prioritisation Framework and Carriageway Investment Strategy to be approved by Cabinet.	Autumn/Winter 2015	Autumn/Winter 2017 Annual review
Undertake a review of staff training needs in relation to the Institute of Asset Management competencies framework.	Spring 2016	Spring 2018 Annual review
Develop initial options and scope for Structures Investment Strategy	Autumn 2016	Autumn 2018
Develop full Structures Investment Strategy.	Autumn 2017	Autumn 2018
Supporting Documentation Review	Spring 2016 to Autumn 2017	Spring 2018 Annual Review
<b>Resilience</b>		
at	Autumn 2015	Autumn 2018 Annual review
Complete surveys of condition and connectivity of drainage assets on the A127	Autumn 2015	
Revise maintenance hierarchies for carriageways, footways and cycleway in line with the revised Codes of Practice.	Spring 2016	Spring 2017 Annual review

Undertake consultations with emergency services, Environment Agency and Anglian Water on the Resilient Network.	Spring 2016	Spring 2018 Annual review
Approval of Resilient Network by Cabinet.	Summer 2016	Summer 2018
Complete surveys of drainage condition on the Resilient Network in Critical Drainage Areas.	Autumn 2016	Autumn 2017 Annual review
<b>Customer focus</b>		
Produce a Stakeholder Communication Plan for the TAMS	Autumn 2015	Autumn 2017 Annual review
<b>Benchmarking and collaboration</b>		
Develop common approach to production of Whole of Government Accounts with Local Councils' Highway Investment Group	Autumn 2015	Autumn 2017 Annual review
Develop performance benchmarking with Local Councils' Highway Investment Group	Spring 2016	Spring 2017 Annual review

**Appendix F – Risk Register**

**Appendix G – Asset Management Performance  
Management & Continuous Improvement Framework**

**Appendix H – Asset Management Competence Framework**

**Appendix I – Process Classification Document/Forward  
Programme & Budget Setting**

**Appendix J – Definition of Benchmarking Principles**

**Appendix K – KPI Benchmarking**

**Appendix L – Communication Plan & Engagement  
Guidelines**

**Appendix M – Data Management Strategy**

## **Appendix N - Glossary of Terms and Abbreviations**

### **ADEPT - Association of Directors of Environment, Economy Planning and Transport**

This is an umbrella organisation representing local authority county, unitary and metropolitan directors responsible for 'Place based' services.

### **APSE – Association for Public Service Excellence**

APSE is a network of some 23,000 officers and councillors responsible for frontline services in local authorities in England, Northern Ireland, Scotland and Wales. APSE helps councils to share information and best practice.

### **Asset Management**

A strategic approach which identifies the optimal allocation of resources for the management, operation, preservation and enhancement of the highway infrastructure to meet the needs of current and future customers.

### **Asset Valuation**

The calculation of the current monetary value of an authority's assets purely in terms of their maintenance and replacement costs. It excludes therefore any consideration of the value to the community in terms of the economic and social benefits of providing a means for people to travel in order to work, socialise and live.

### **CIPFA - Chartered Institute of Public Finance and Accountancy**

A professional body for people in public finance where public money needs to be effectively and efficiently managed.

### **Critical Assets**

For the purpose of Highways Infrastructure Asset Management, Critical Assets are defined as Carriageways, Footways, Street Lighting, Structures (Bridges, Retaining Walls, etc.), Traffic Signals, Traffic Management Systems (Variable Matrix Signs, Traffic Signs, etc.) and drainage.

### **CVI - Coarse Visual Inspection**

This is a coarse, rapid survey, usually carried out from a slow-moving vehicle, which allows authority's unclassified road network to be assessed each year.

### **Depreciation**

The consumption of economic benefits embodied in an asset over its service life arising from use, ageing, deterioration, damage or obsolescence.

### **Deterioration**

The change in physical condition of an asset resulting from use or ageing. Often displayed as a 'deterioration curve' in graphical form.

### **DfT - Department for Transport**

Government department responsible for providing policy, guidance, and funding to English local authorities to help them maintain their highway networks, improve passenger and freight travel, and develop new major highway schemes.

### **DRC - Depreciated Replacement Cost**

The current value of the asset, normally calculated as the gross replacement cost minus accumulated depreciation and impairment.

### **DVI - Detailed Visual Inspection**

The DVI survey is more comprehensive than the CVI, carried out as a walked survey, with defects and inventory collected with a greater number of defect classifications.

### **HIAM – Highways Infrastructure Asset Management**

#### **LCRIG - Local Council's Road Investment Group**

To develop and promote a fresh approach to highway asset management that engenders wider stakeholder involvement and focuses on investment outcomes for present and future generations. To develop new common methodologies to understand /communicate the true state of Highways Infrastructure to facilitate long term robust business plans and determine the correct level of investment for today and the future.

#### **SaQ – Self-assessment Questionnaire**

For 2017/18, each local highway authority in England (excluding London) is invited by DfT to complete a self-assessment questionnaire, in order to establish the share of the Incentive fund they will be eligible for in 2017/18. This includes those authorities who are currently deemed Band 3 from the 2016/17 round.

#### **TAMS – Transport Asset Management Strategy**

#### **WGA - Whole of Government Accounts**



Preparing the Whole of Government Account (WGA) was necessary to meet the undertaking in the Code for Fiscal Stability to produce consolidated accounts for the whole public sector on the basis of International Financial Reporting Standards (IFRS). Publishing audited WGA also improves the transparency of government's finances. It attempts to show in a single document what the government owes, owns, spends and receives. For now the process has been suspended.

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# APPENDIX C

## Carriageway Lifecycle Plan - Investment Options for Road Maintenance

### 1. Purpose of this document

1.1 This document presents the results of scenario testing that explain the implications of different funding levels and maintenance methods for the future condition of roads within the Borough. The report also provides recommendations for an investment strategy for road maintenance.

1.2 The recommended strategy will form part of the Council's Transport Asset Management Strategy.

### 2. Background

#### 2.1 How much does the Council spend on major maintenance of roads?

2.1.1 Since 2010/11 the Council has spent an average of £2.1M of capital each year on major maintenance of roads. This included grant funding from the Department for Transport and also included additional capital funding from the Council.

2.1.2 In 2017/18 and 2018/19 the Council has allocated £1.0M each year for maintenance of roads and pavements in addition to the money it receives from the Department for Transport. In 2017/18 the total allocation specifically for roads is £2.518M which is greater than the average spend since 2010/11.

#### 2.2 Is the overall condition of roads getting better or worse?

2.2.1 Evidence from road condition surveys indicates that the condition of Southend's road network is gradually declining. Between 2014/15 and 2015/16 the percentage of roads in poor condition (with potholes and unevenness) rose from 12.7% to 13.5%.

2.2.2 This is in spite of additional capital funding provided by the Council since 2014 to road maintenance over and above the funding allocations it receives from Central Government.

2.2.3 Currently the Council allocates its capital money for road maintenance solely to resurfacing. Whilst this approach provides long term solutions for the specific roads treated, individual resurfacing schemes require a significant capital investment and therefore the Council can only treat a limited number of roads using this method.

2.2.4 This means that with current budgets it would take the Council nearly 200 years to resurface every local street in the Borough.

## **2.3 The need for a long term strategy for maintenance**

2.3.1 A sustainable road network is vital to the future prosperity of the town particularly in view of the key role of tourism to our economy as well as the need to realise potential for economic growth in the Southend Airport area, Shoeburyness and other regeneration areas.

2.3.2 Failure to prevent decline in the condition of the network can lead to a disproportionate increase in the cost of road repairs and personal injury or damage claims and can deter inward investment in the Borough.

## **2.4 The forecasting model**

2.4.1 The Council has tested a number of scenarios using a forecasting model to find out what the implications of the funding shortfall are over the next 20 years and to identify how much budget is required to ensure that the length of roads affected by poor condition does not increase.

2.4.2 The forecasting model was also used to identify if adopting a proactive approach to maintenance would enable the Council to do this at a lower cost than could be achieved by only doing resurfacing.

2.4.3 An additional scenario was tested to identify how much investment would be required to improve the overall condition of the Borough's roads.

2.4.4 The forecasting model was developed using detailed statistical analysis of data on the condition of Southend's roads and historical data on maintenance carried out in the Borough. It uses this analysis to show how the likelihood of deterioration changes over time following different types of maintenance.

2.4.5 The model also accounts for different types of road, reflecting the level of usage by traffic and the construction of the road amongst other factors.

## **2.5 Road maintenance options**

2.5.1 There are 3 key types of maintenance that are considered in the forecasting model.

### ***Resurfacing***

2.5.2 This involves planing off and relaying of a new surface course over a whole section of road and, dependent on the condition of lower layers, replacing varying amounts of these lower layers too. This is carried out using specialised machinery.

### ***Patch repairs***

2.5.3 This involves localised repairs, for example, around a group of potholes and sections that are cracked or likely to deteriorate in the short term.

### ***Proactive maintenance***

2.5.4 These involve the laying of a thin surface on top of the old surface, which is called Microasphalt. This can improve the smoothness and appearance of the road as well as greatly reducing the rate of deterioration of the road structure. Also, because they are typically ¼ of the cost of resurfacing it is possible to treat far more roads with existing budgets. This also means that, on local roads, the Council can avoid the need to do expensive resurfacing for at least a further 15-20 years.

### 3. Summary of findings

3.1 This summary presents the results of 4 scenarios as follows:

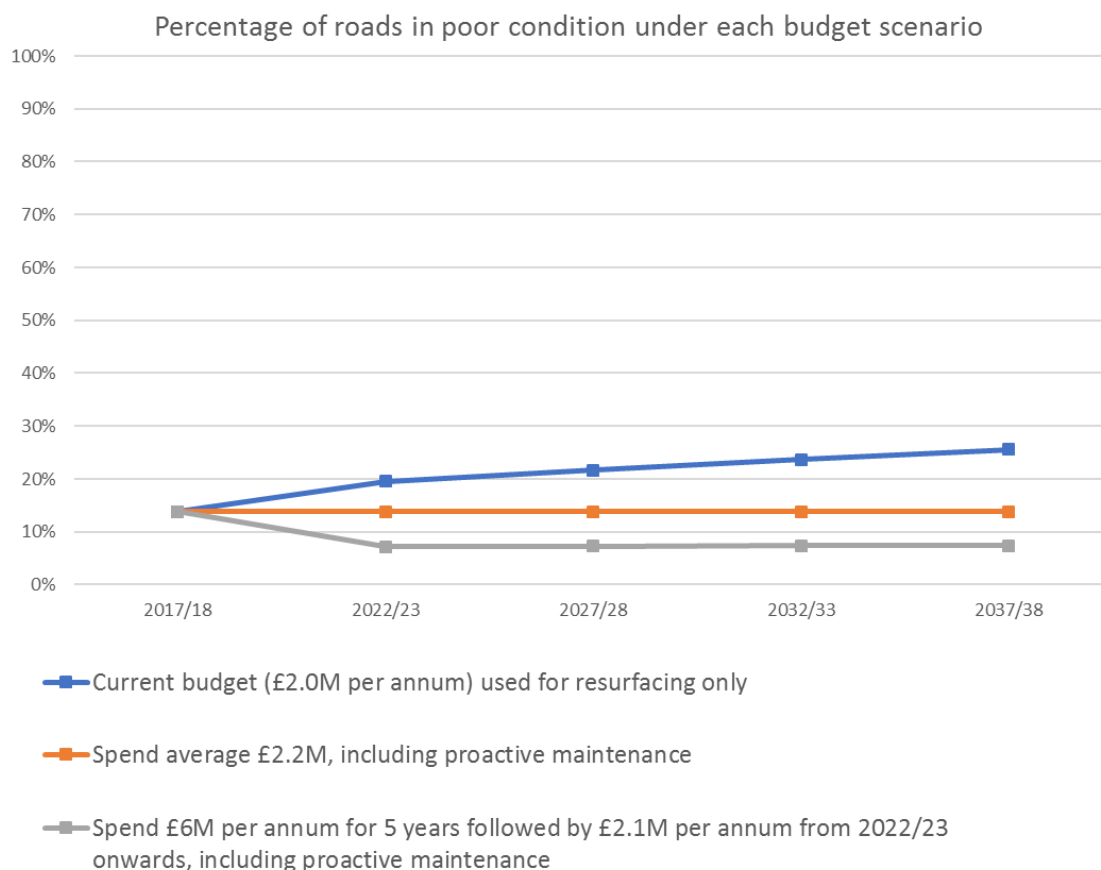
3.1.1 Continue to allocate the same level of annual spend on road maintenance as provided in the 2017/18 budget

3.1.2 Increase the amount of resurfacing to ensure that the percentage of roads affected by poor condition does not increase over the next 20 years

3.1.3 Use a proactive maintenance approach (with Microasphalt) to ensure that the percentage of roads affected by poor condition does not increase over the next 20 years

3.1.4 Invest additional money to halve the percentage of roads affected by poor condition in 5 years (by 2022/23)

3.2 In each scenario the model produces a forecast of the change in percentage of roads affected by poor condition. These are summarised in the chart below.



3.3 The results of forecasting indicate that if the Council continues to allocate the same level of annual spend on road maintenance as provided in the 2017/18 budget (£2.0M) the percentage of roads in poor condition will double over the next 20 years.

3.4 If the Council continues to allocate capital money only to resurfacing and reconstruction of roads then it will require an additional £0.6M (£2.6M) each year to ensure that the length of roads affected by poor condition does not increase over the next 20 years.

3.5 However, if the Council adopts a proactive maintenance approach using Microasphalt treatments it will only require an additional £0.2M (£2.2M) each year to ensure that the length of roads affected by poor condition does not increase over the next 20 years.

3.6 If the Council invests an average of £6M each year for 5 years then it will be able to halve the length of roads affected by poor condition. Thereafter, using a proactive maintenance approach the Council would need to spend £2.1M each year to ensure that the length of roads affected by poor condition does not increase.

3.7 It is unlikely that prudential borrowing could be used to finance such an investment as there are few opportunities to make savings in the reactive repairs budget (which currently stands at approximately £0.150M per year). Also, the Council has successfully maintained a very low rate of payouts for highway claims so there is little scope to make further savings in this area.

## **4. Conclusions and recommendations**

4.1 The forecast model demonstrates that £2.2M of capital is required each year for road maintenance over the next 20 years in order to avoid any further increases in the percentage of roads affected by poor condition. This requires approximately £0.2M of additional capital compared with the current 2017/18 allocation.

4.2 Without this additional investment the percentage of roads in poor condition is forecast to nearly double over the next 20 years.

4.3 The forecast model has also demonstrated that a proactive maintenance approach is needed to achieve this. This will enable the Council to extend maintenance treatments to far more roads each year than would be possible if the Council continued with only resurfacing.

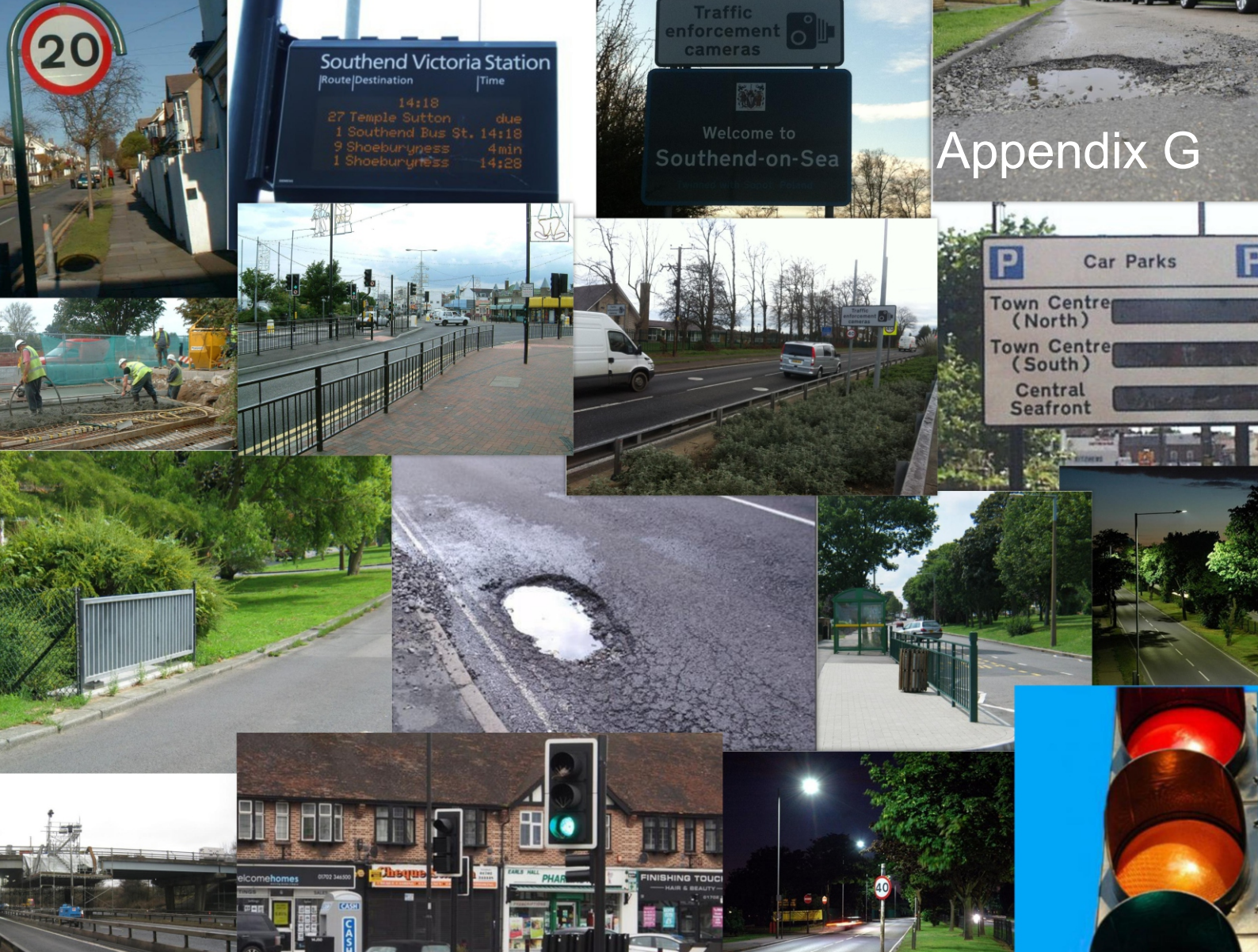
4.4 Without a proactive maintenance approach the Council would need to spend an extra £0.6M each year compared with the current 2017/18 allocation to avoid further increases in the percentage of roads affected by poor condition. This reflects the fact that individual resurfacing schemes require more significant capital investment than would be the case with the proactive maintenance approach.

4.5 Therefore it is recommended that a proactive maintenance approach is adopted as a strategy for maintaining Southend's roads.

4.5 A further option was tested to estimate the costs of works required to halve the percentage of roads in poor condition. This option would require £6M each year for 5 years followed by continued investment of £2.1M each year for the rest of the 20 year period.

4.6 There are limited opportunities to make savings through this last option . However, it is recommended to undertake further work to identify the benefits of targeted investment in road maintenance in key areas within the Borough such as regeneration areas and areas susceptible to flooding. In the latter case it is recommended that future proposals for investment in road maintenance are considered as a coordinated package with improvements to drainage and culverts.

# Appendix G



## Asset Management Performance Management & Continuous Improvement



March 2017





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## **Asset Management Framework**

Southend on Sea Borough Council has developed the following Asset Management Framework for all its activities and processes which are necessary to manage, document, implement and continually improve delivery of its transport infrastructure asset management.

## **Performance Management and Continuous Improvement Framework**

The purpose of the Asset Management Performance Management and Continuous Improvement Framework is to support Southend on Sea Borough Council in delivering its asset management priorities through a robust, transparent and repeatable process for recording, monitoring, analysing, and reporting performance for all its critical infrastructure assets. A Performance Management and Continuous Improvement Framework, that links strategic and operational criteria, is fundamental to a holistic asset management approach. It enables Southend on Sea Borough Council to assess and demonstrate the impact that different investment scenarios will have on the performance of the infrastructure network, level of road user satisfaction, engineering/contract measures and condition targets.

In particular the Performance Management and Continuous Improvement Framework can:

- demonstrate actual performance against targets to all asset management stakeholders
- show the effectiveness of the spend on infrastructure assets

## **Importance of Performance Management**

Successful asset management delivery requires the ongoing monitoring of performance in order to ensure that the agreed levels of service are being delivered. Performance management is important to Southend on Sea Borough Council as it provides the ability to:

- Document the differences between actual and planned performance and identify the reasons for any differences
- Prioritise and allocate diminishing resources effectively;
- Ensure value for money;
- Motivate and engage competent staff, and assign accountability;
- Identify and rectify poor performance at an early stage;
- Learn from past performance and improve future performance;
- Increase public satisfaction and help improve services for service users;
- Implement action strategies to adapt performance.

## **Performance Monitoring**

The performance of the highways service will be benchmarked against a series of asset management performance indicators for the critical assets initially, with the intention of incorporating the non-critical assets over time.

The asset management performance indicators assess the inventory data quality and coverage for each asset type identified and will be benchmarked against the 5-year action plan and improvement targets developed from the gap analysis. Robust, high quality inventory and condition data allows Southend on Sea Borough Council to monitor the impact of the Highway Infrastructure Asset Management Plan (HIAMP) and review and implement changes

if required. Results from the performance indicators are reviewed at regular intervals with senior decision makers.

#### PLACE MPR – Asset Management local Indicators

PI	Short Name	Calculation/collection method	Current Target	Collection
MP2	KBI 21 -Satisfaction with road safety environment	Calculation/Collection method - NHT Survey	65%	Yearly
MP3	KBI 03 -Ease of access	Calculation/Collection method - NHT survey	80%	Yearly
MP4	KBI 04 -Ease of access (disabilities)	Calculation/Collection method - NHT Survey	80%	Yearly
MP5	KBI 05 -Ease of access (no car)	Calculation/Collection method - NHT Survey	80%	Yearly
MP7	KBI 08 -Satisfaction with Local PT Information (BVPI103)	Calculation/Collection method - NHT Survey	50%	Yearly
MP8 (a)	KBI 12 -Satisfaction with specific aspects of Pavements & Footpaths	Calculation/Collection method - NHT Survey	65%	Yearly
MP8 (b)	KBI 13 -Overall Satisfaction with Cycle Routes & Facilities	Calculation/Collection method - NHT Survey	65%	Yearly
MP9	KBI 17 -Overall Satisfaction with Traffic Levels & Congestion i.e. queues	Calculation/Collection method - NHT Survey	50%	Yearly
MP10	HMBI 01 -Condition of road surfaces	collection - NHT survey	40%	Yearly
MP11 (a)	Contract KPI -Lot 1	Calculation/Collection method - Service manager/contract meetings	75%	Quarterly
MP11 (b)	Contract KPI -Lot 2	Calculation/Collection method - Service manager/contract meetings	75%	Quarterly
MP11 (c)	Contract KPI -Lot 3	Calculation/Collection method - Service manager/contract meetings	75%	Quarterly
MP11 (d)	Contract KPI -Lot 4	Calculation/Collection method - Service manager/contract meetings	75%	Quarterly
MP11 (e)	Contract KPI -Lot 5	Calculation/Collection method - Service manager/contract meetings	75%	Quarterly
MP12	HMBI 11 -Provision of drains	Calculation/Collection method - NHT Survey	60%	Yearly
MP13	HMBI 22 -deals with flooding -roads and pavements	Calculation/Collection method - NHT Survey	55%	Yearly
MP14	HMBI 12 -Keeps drains clear and working	Calculation/Collection method - NHT Survey	60%	Yearly
MP16	HMBI 9 -Maintenance of highway verges/trees/shrubs	Calculation/Collection method - NHT Survey	60%	Yearly
MP17	Reduction of the number of street light outages	Calculation/Collection method - Dead sure reports	1,500	Yearly
MP18	HMBI 5 -Provision of street lighting	Calculation/Collection method - NHT Survey	65%	Yearly
MP21	TCBI9 -Location of permanent traffic lights	Calculation/Collection method - NHT Survey	70%	Yearly
NI 178(i)	Bus services running on time: Percentage of non-frequent services on time.		74.0%	Quarterly

## Types of Performance Monitoring

Audits can include customer satisfaction surveys, sample condition surveys and adhoc inspections. Random audits can be used to independently audit the performance of the Highway authority who is working under quality management systems. System audits where software systems have been implemented will provide a source of performance management data. Monthly audits where established systems are in place to obtain monthly performance statistics. Annual audits are where indicators are based on information supplied annually.

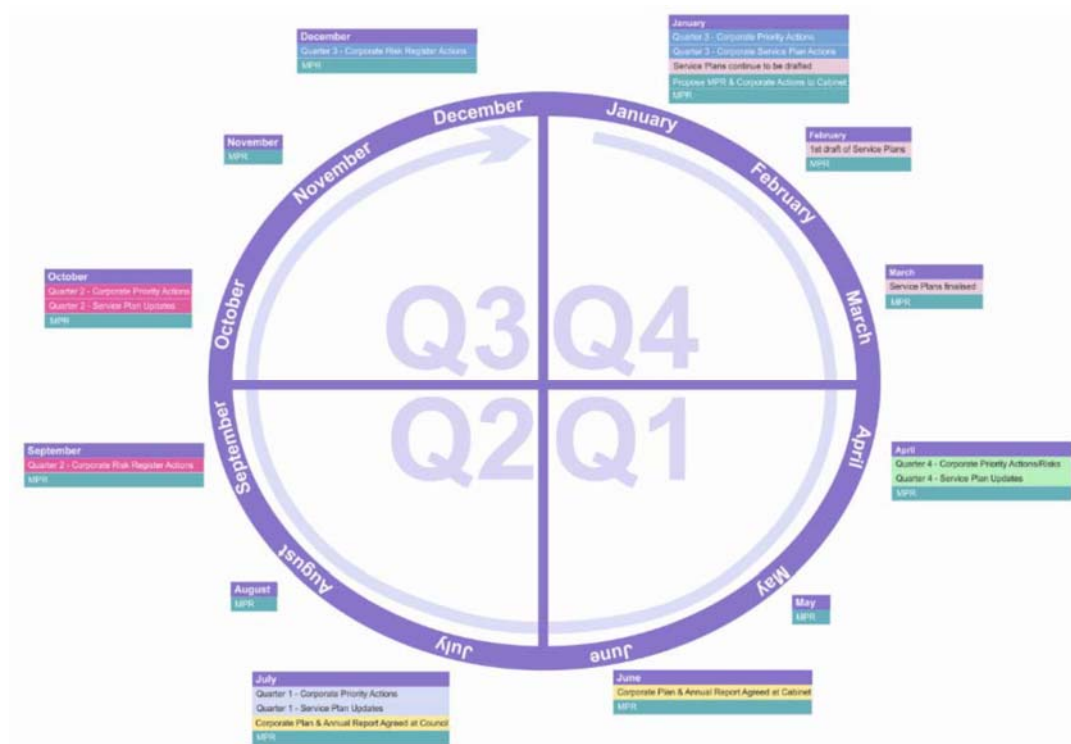
## Performance Reporting including The Performance Timeline

All elements of Performance Management in the Department for Place and its Continuous Improvement Framework are built around the annual performance timeline. Monitoring and regularly reporting on performance is essential for ensuring that the Department for Place achieve the Council's priorities and that the information informs decision-making and future plans.

The Department for Place have a number of key Corporate Performance Indicators which are monitored and reported in the Council's Monthly Performance Report (MPR). This report is presented to the Departmental Management Team (DMT) and the Corporate Management Team (CMT) and Cabinet.

The Corporate Priority Actions and Risks are also monitored and reported to the meetings above on a quarterly basis. Within the Service Plans for each Service Area there are a number of Indicators, Actions and Risks, which are specific to their areas of expertise, together with robust analysis that supports this data. These are monitored and reported quarterly to DMT.

All Indicators, Actions and Risks are recorded and monitored on the Corporate Performance Management Software (Covalent).



The Department for Place aims to operate a Performance and Risk Management system where everyone knows;

- What needs to be achieved,
- What is required of them and when
- What is measured and managed
- What progress is being made

The Department's resources must be aligned, focusing effort in the right places and delivering maximum value for the residents and visitors of Southend. The Department must proactively manage any risks that might affect delivery by regularly reviewing progress and taking action to stay on target. To help achieve its aims the Department will strive to ensure that the following characteristics, which have been identified as important in high performing organisations are embedded across the Departmental service areas:



The effective management of performance within the Department for Place follows the seven values of the Council, which are;

1. **Excellence** - we aspire for excellence in our work
2. **As One** - we work as one organisation
3. **Responsible** - we are all responsible for the performance of our organisation
4. **Open and Honest** – we are open, honest and transparent
5. **Customer Care** - good customer care is at the heart of everything we do
6. **Supportive** - we support, trust and develop each other
7. **Valuing All** - we value the contribution of our people

The Department for Place also embeds the Council's vision of 'Creating a better Southend' supported by the following five aims as included within the Departmental Service Plans, linking Corporate Priorities, Indicators and risks to these aims;

- Clean
- Safe
- Healthy

- Prosperous
- Led by an Excellent Council

Continuous Improvement is used by the Department for the on-going improvement of services delivered within the Service Areas.

### **Key Principles (creating a culture of);**

- Continuously understanding customers' needs
- Optimising organisational performance
- Focusing on means to an end
- Continuous learning on mistakes
- Continuously improving systems and processes
- Fixing root causes of problems
- Every level is responsible for continuous improvement

### **Risk Management**

Using the Risk Management Policy Statement and Strategy 2015 (found at <http://seattle/Pages/Risk-Management.aspx>) as a guide, Department for Place is aware of the need to manage risks. Service Plans for each Service Area include a section for Departmental Risks, these are reported on Quarterly. Deputy Chief Executive for Place will liaise with the Directors to identify those risks that are of such significance that they are required to be monitored via the Council's Corporate Risk Register. Corporate Risks are considered monthly by CMT and in detail quarterly. The risks are monitored and updated on Covalent for ease and consistency of management.

### **Risk Register and Scoring Process**

The Council's risk policy and toolkit provides a methodology for undertaking risk management and includes the 'impact' and 'likelihood' criteria and scoring process that can be applied to the risk register. It also includes an outline of how to apply principles of risk appetite and tolerance to consideration of risk – that is the amount of risk the Council is willing to accept (appetite) and the boundaries of what the Council is willing to venture (tolerance) in pursuing its objectives.

### **Benchmarking**

The Department will use benchmarking as a way to measure the quality of our policies, services, programs, strategies and compare with standard measurement or similar measurements of our peers. The objectives of benchmarking are;

1. To determine what and where improvements are called for.
2. To analyse how other organisations achieve their high performance levels
3. To use this information to improve performance.

## Code of Conduct:

**Principle of Preparation** – Be fully prepared for exchange with partners to ensure you get the most out of the time of benchmarking with them.

**Principle of Contact** - Respect the corporate culture of partner local authorities and work in accordance with procedures mutually agreed. Avoid revealing the name of a contact in an open meeting without having obtained prior consent from the contact.

**Principle of Exchange** - Be honest, complete and timely with information submitted. Provide the same type and level of information to partners that you have requested.

**Principle of Confidentiality** - The participation of a local authority in a study is confidential and must not be revealed to a third party without the prior consent.

**Principle of Use** - Use information obtained through Benchmarking only for purposes stated to and agreed with the Benchmarking partner.

**Principle of Legality** - Do not provide the results of a benchmarking study without first having obtained the consent of the parties that participated in the study.

**Principle of Completion** - Follow through with each commitment made to your Benchmarking partner in a timely manner.

**Principle of Understanding and Agreement** – Understand how benchmarking partners would like to be treated and agree how your partner expects you to use the information provided.

Benchmarking for asset management is carried out using the NHT Survey on a yearly basis. The data is compared to previous years and other authorities to identify potential for improvement. The Authority are members of Eastern Highways Alliance, CQC Efficiency Network and Local Council's Road Investment Group (LCRIG).

## Customer Expectations

Highway networks are provided for the benefits of customers. The customer's view of the service being provided is, therefore, a highly important piece of information. Customers should be directly involved in establishing the target performance of the asset. It is then the role of the Highway Authority to demonstrate that customer defined performance is being striven for, within existing budgetary and resource constraints.

Customer consultation is an important tool for defining and managing customer expectations. Customer surveys can be used to establish the degree of satisfaction with current levels of service. Specifically surveys can assist by identifying:

- Which aspects of the service are of most importance to the customer e.g. is street-lighting more important than snow clearing during the winter?
- The degree of satisfaction with particular aspects of the service.

Combining these two elements can provide useful information to assist authorities to focus their attention on the areas of greatest customer need.



## Customer Satisfaction Survey

The Authority participates in the National Highway and Transport (NHT) Public Satisfaction Survey in order to understand the customers view on Highways and Transport Services. Results are available at [www.nhtsurvey.org](http://www.nhtsurvey.org) The Council has been part of this survey since 2010. This helps us to understand the views of residents and to be able to compare results with other authorities and is recommended in the Pothole review - Public Opinion Surveys Recommendation 2 (**HMEP: The Pothole Review (first published by HMEP in April 2012)**).

The Authority also uses the Govmetric System which provides a quick and easy way for customers to provide us with direct feedback every day. It measures the level of customer satisfaction with SBC website content and for customer contact made by telephone and face to face with the Customer Service Centre. The information provided is collated into a series of monthly reports. These provide insight into where the Authority is performing well and where customers would like to see Improvement. Reports covering Customer Comments can also be made available but are not placed on the intranet due to their sometimes sensitive nature. The Department for Place has access to the Govmetric system and can run reports for each service area. Local indicators for Govmetric satisfaction are set up for Highways services.

## Customer Communications

Customer contact with the Authority is recorded and managed using a Customer Relationship Management (CRM) System which for the Council is currently Lagan. Actions taken are then monitored and reported for all services within the Department.

## Customer Reviews / Keeping Customers Informed

The Department regularly reviews its web pages to ensure that the information is current and up to date. There is a Departmental representative in the Performance Team who works with the service areas and the media team in creating the pages and links to get the information out in the public domain in a concise way. We also use social media like Twitter and Facebook in a variety of ways. Twitter is used to inform on road closures, road works, and public transport information, planning news and various events across the Borough. This media holds a more formal relationship with followers and does not encourage communication, (although they can interact, it is restrictive) unlike Facebook which encourages interaction, debate and communication in the form of comments on posts, this media is mainly used for promotional/ marketing and tourist information.

## Consultations with residents

The Department consults with local residents, businesses and voluntary groups on various different subjects/ projects (statutory and non- statutory) as and when required. This can range from planning and licensing applications, major transport schemes or general service changes. The Department recognises that the local community has a wealth of knowledge and experience and we are committed to engaging and working with these communities to improve services and wellbeing for all that live and work in the Borough.

## Freedom of Information (FOI)

Freedom of Information (FOI) requests are received by the Corporate FOI Team, who record these on Covalent and pass to the Lead Officer within the Department to search for the information held and formulate a response; the time limit for responses is 20 working days from the date of receipt. Should an Officer receive a FOI request directly they will forward these either to [SouthendFOIrequests@southend.gov.uk](mailto:SouthendFOIrequests@southend.gov.uk) or the Lead Officer. The Freedom of Information Act 2000 gives the public extensive access rights to all types of information held by the Council.

Further information can be found at <http://seattle/Pages/Freedom-of-Information.aspx>.

## Subject Access Requests

Department for Place has a Data Controller who deals with Subject Access Requests which are received. Subject Access Requests are submitted under the Data Protection Act for a small fee and allow an individual access to the following;

- To be told if the Authority holds personal information about them
- To ask what it uses the information for
- To be given a copy of the information
- To be given details about the purposes for which the Authority uses the information
- To ask for incorrect data to be corrected
- To have any abbreviations of jargon explained that may not be clear
- To receive a reply within 40 calendar days
- Subject Access applies to both computer and manual records
- Release of the Data Subjects information is a legal requirement and may carry heavy penalties if it is deemed the Council failed to comply with the request in a satisfactory manner.

## Complaints Management

The Department welcomes comments, compliments and complaints to help us deliver our services to the highest possible standard and to maintain improvement. Continuous feedback is a valuable source of information for monitoring our performance; this highlights the areas where we can improve as well as recognising the things we do well. To make sure we deal with complaints in accordance with the Council's Complaints Procedure there is a corporate manual, which can be viewed at <http://seattle/Pages/Comments-Complaints-and-Compliments.aspx>, all complaints received for the Department are dealt with by a dedicated Complaints Officer who logs these onto Covalent and sends to the appropriate team to respond to.

The three Stages of Complaints is as follows;

**Stage 1** - a written response from the relevant Group Manager within 10 working days.

**Stage 2** - investigated and response provide by the relevant Director or Deputy Chief Executive within 10 working days.

**Stage 3** - appeal to the Council's Chief Executive and Leader of the Council, investigation is undertaken by the Corporate Complaint Representative and a report presented to the Chief Executive for consideration and response within 35 working days.

The complainant has the right to go to the Local Governance Ombudsman (LGO) if they feel their complaint has not been dealt with appropriately. However, the LGO will only deal with a case if it has exhausted the Council's procedures. Each comment, compliment and complaint is logged and monitored weekly and monthly statistics are reported to DMT to ensure that the Service Level Agreement is met.

All complaints and comments regarding the highway assets are monitored and reviewed in order to improve the service and customer satisfaction.

### Data collection and quality

Robust and timely data is essential to inform decision making and identify where performance needs to be improved. Making decisions based on incorrect or inaccurate information or data can lead to a wrong decision being made with the potential for significant consequences. Data requirements should be designed beside the principle of 'right first time, every time' in order to avoid wasting time and money spend on cleansing data, interfacing between different information systems, matching and consolidating data from multiple databases, and maintaining outdated systems.

The Department for Place have adopted five key characteristics of good quality data;

**Accuracy** - Data has to be accurate to be high quality. Accuracy means the data reflects the reality. It is important to remember that data can be complete, yet remain inaccurate. The concept of 'right first time, every time' is useful in making sure there isn't unnecessary checking, correcting or reformatting of information once it has been submitted thus saving valuable staff time and resources.

**Validity** - Data should be recorded and used in line with relevant rules or definitions. This will ensure consistency between different reporting periods and will enable benchmarking with other organisations.

**Reliability** - Data should be collected using a consistent method or approach, particularly if collected across different collection points and over time. Managers and stakeholders should be confident that progress reflects real improvements rather than as a result of variations in the method or approach of data collection.

**Timeliness** - Data must be available quickly and frequently enough to support and influence service or management decisions.

**Relevance** - Data should only be captured if it is relevant to the purposes for which it is being used. If data isn't used then there is no justification for it to be captured. Therefore it is good practice to review requirements periodically and make changes accordingly.

Also anybody who is responsible for collecting a performance indicator should:

- Fully understand the definition and method of collecting/recording the data;
- Ensure the data is checked every time it is produced;
- Ensure the source of the data is accurate – for example that the process for inputting the data is clear and well understood and minimises mistakes.

Any checks that the Department have carried out demonstrate the data used is accurate. At the end of each financial year Group Managers will be required to sign a declaration that all of the performance information produced by their service is accurate. Spot checks will be undertaken by Internal Audit.

### **Data Protection Principles**

- Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met.
- Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.
- Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
- Personal data shall be accurate and where necessary kept up to date.
- Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- Data will be destroyed after use in line with the Councils Corporate deletion policy.
- Personal data shall be processed in accordance with the rights of Data Subjects under this Act.
- Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of/ or damage to personal data.
- Personal data shall not be transferred to a territory or country outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

### **Levels of Service**

This section describes how the levels of service are developed for an asset, categorised under the service groupings and used to evaluate and measure performance. Levels of service are: “the agreed service quality for a particular activity or service area against which performance can be measured. Service levels usually relate to quality, quantity, reliability, responsiveness, environmental acceptability and affordability”. Levels of service can be developed from both asset condition (existing / desired) and demand aspirations (i.e. what the asset is expected to deliver).

### **Why Use Levels of Service?**

Levels of service are an integral component of the asset management process. They are used to define service delivery levels (or service options) for each asset type. The levels of service are part of the criteria used to prioritise maintenance schemes, to monitor agreed performance measures and identify how the level of service are being delivered.

The Southend on Sea Borough Council’s levels of service will be used:

- To develop asset specific strategies to deliver the agreed level of service;
- To identify the costs and benefits of the agreed levels of services;
- As a measure of the effectiveness of the HIAMP.

Future developments of this HIAMP will seek to consult with customers of the proposed type and level of service to be offered and whether these align with their expectations.

## Highways Contract Management

The following Contracts are in place, with a summary below on how they are managed.

**Lot 1** – Highway Minor Maintenance, Bridge Maintenance & Strengthening, Sea Defences, Foreshore Maintenance & Flood Risk Management – Marlborough Surfacing Ltd – Service Manager – Neil Hoskins

**Lot 2** – Highway Improvements – Eurovia Infrastructure Ltd – Service Manager – Justin Styles

**Lot 3** – Traffic Signals – Urban Traffic Control – Service Manager – Richard Backhouse

**Lot 4** – Traffic Signals Control System – Imtech – Service Manager – Richard Backhouse

**Lot 5** – Planned Machine Resurfacing – Marlborough Surfacing Ltd – Service Manager – Neil Hoskins

Performance meetings are held monthly, minuted and stored securely on a secure server. Key Performance Indicators are reviewed and are uploaded onto Covalent (monthly) and there is a performance indicator measure for each Lot.

## Cashable and Non Cashable savings

**Cashable Savings** are savings which release money for redeployment elsewhere. In some cases these savings are ring-fenced.

Capex or capital expenditure is defined as expenditure which creates future benefits. A capital expenditure is incurred when a business spends money either to buy fixed assets or to add to the value of an existing asset with a useful life that extends beyond the tax year.

Opex or operational expenditure is defined as expenses incurred in the course of ordinary business, such as sales, general and administrative expenses.

**Non-cashable Savings** are savings that are achieved by the ability to deliver continued or better results or to cope with rising workloads – without a proportionate increase in resources. The saving is identified as the amount of resources that would have been required had this not been possible.

Each year cashable and non-cashable savings for the service are identified and efficiencies are assessed to identify areas for improvement. This information is shared with senior decision makers.

## Lean Review

When conducting a lean review Southend on Sea Borough Council will adopt the lean principles as recommended in the Highways Maintenance Efficiency Programme 'A Lean toolkit for Highway Services Version 1 December 2013' and will document the findings of any transformational service review and regular monitoring of the progress to ensure a process of continuous improvement is in place and evidence of improvement, efficiency and savings have been achieved.

The framework is summarised below







**Legal/ Regulatory - Ability**  
 Performance Management  
 Risk Management  
 Financial Management  
 People Management  
 Business Awareness  
 Report Writing  
 Risk Balancing  
 Strategic Thinking  
 Decision Making  
 Convergent/ Divergent Thinking  
 Business Continuity  
 Communication

**Legal/ Regulatory - Appreciation**  
 Sustainable Energy Management  
 Lifecycle Management  
 Whole Life Costing  
 Monte Carlo Risk Assessment  
 Prince2/MS Project

**Legal/ Regulatory - Experience**  
 Project Management  
 Contract Management

**Legal/ Regulatory - Knowledge**  
 Highways Law  
 Street Works Law  
 Environmental Law  
 Insurance Law  
 OJEU Procurement  
 Statutory Law Orders  
 Regulations - CDM  
 Emergency Planning  
 Data/Information Management  
 Procurement Management  
 Research

**Technical - Appreciation**  
 Geometric Design  
 Road Restraint Systems  
 Material Engineering  
 Highway Engineering  
 Bridge Structural Engineering  
 Drainage Engineering inc. SUDs

**Technical - Experience**  
 Operational (Service) Delivery

**Technical - Knowledge**  
 Value Engineering  
 Network Management  
 Traffic Management  
 Work Cost Estimates  
 Purchase Order

**Director**

Skill 1  
Appreciation

Skill 2  
Knowledge

Skill 3  
Experience

Skill 4  
Ability

**ICT - Appreciation**  
 IT Application User - Symology  
 IT Application User - AutoCad

**ICT - Experience**  
 IT Application User - Agresso

**Skill 1**  
 At this level staff should have a general understanding of this area of work and the basic relevance and importance of the topic.

**Skill 2**  
 In addition to having a general awareness of the topic, this level requires staff to know how work is carried out in this field, and to be able to do so with guidance and supervision.

**Skill 3**  
 Here, the requirement is to demonstrate an understanding of the principles involved and to be able to complete tasks and projects in this field independently or under supervision.

**Skill 4**  
 This level requires staff to demonstrate a full understanding of the principles to be able to complete tasks and projects in this field independently and be able to guide, train and supervise

Competence Framework - Asset Management

**Legal/ Regulatory - Ability**

- Risk Balancing
- Strategic Thinking
- Decision Making
- Communication

**Legal/ Regulatory - Experience**

- Regulations - CDM
- Lifecycle Management
- Project Management
- Data/Information Management
- Procurement Management
- Contract Management
- Financial Management
- People Management
- Business Awareness
- Report Writing
- Convergent/ Divergent Thinking
- Prince2 /MS Project

**Legal/ Regulatory - Knowledge**

- Highways Law
- Street Works Law
- Environmental Law
- Insurance Law
- OJEU Procurement
- Statutory Law Orders
- Emergency Planning
- Sustainable Energy Management
- Whole Life Costing
- Performance Management
- Risk Management
- Monte Carlo Risk Assessment
- Research
- Business Continuity

**Group Manager**

- Skill 1 Appreciation**
- Skill 2 Knowledge**
- Skill 3 Experience**
- Skill 4 Ability**

**Technical - Experience**

- Geometric Design
- Work Cost Estimates
- Purchase Order

**Technical - Ability**

- Operational (Service) Delivery

**Technical - Knowledge**

- Road Restraint Systems
- Value Engineering
- Material Engineering
- Highway Engineering
- Bridge Structural Engineering
- Drainage Engineering inc. SUDs
- Network Management
- Traffic Management

**ICT - Knowledge**

- IT Application User - Symology
- IT Application User - AutoCad

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**Legal/ Regulatory - Ability**

- Risk Balancing
- Strategic Thinking
- Decision Making
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**Legal/ Regulatory - Experience**

- Regulations - CDM
- Lifecycle Management
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- Performance Management
- Risk Management
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- Procurement Management
- Contract Management
- Financial Management
- People Management
- Business Awareness
- Report Writing
- Convergent/ Divergent Thinking
- Prince2 /MS Project

**ICT - Experience**

- IT Application User - Agresso

**Asset Manager**

- Skill 1 Appreciation**
- Skill 2 Knowledge**
- Skill 3 Experience**
- Skill 4 Ability**

**Legal/ Regulatory - Knowledge**

- Highways Law
- Street Works Law
- Environmental Law
- Insurance Law
- OJEU Procurement
- Statutory Law Orders
- Emergency Planning
- Research
- Business Continuity

**ICT - Knowledge**

- IT Application User - Symology
- IT Application User - AutoCad

**Technical - Knowledge**

- Road Restraint Systems
- Value Engineering
- Material Engineering
- Highway Engineering
- Network Management
- Traffic Management

**Technical - Ability**

- Operational (Service) Delivery
- Work Cost Estimates
- Purchase Order

**Technical - Experience**

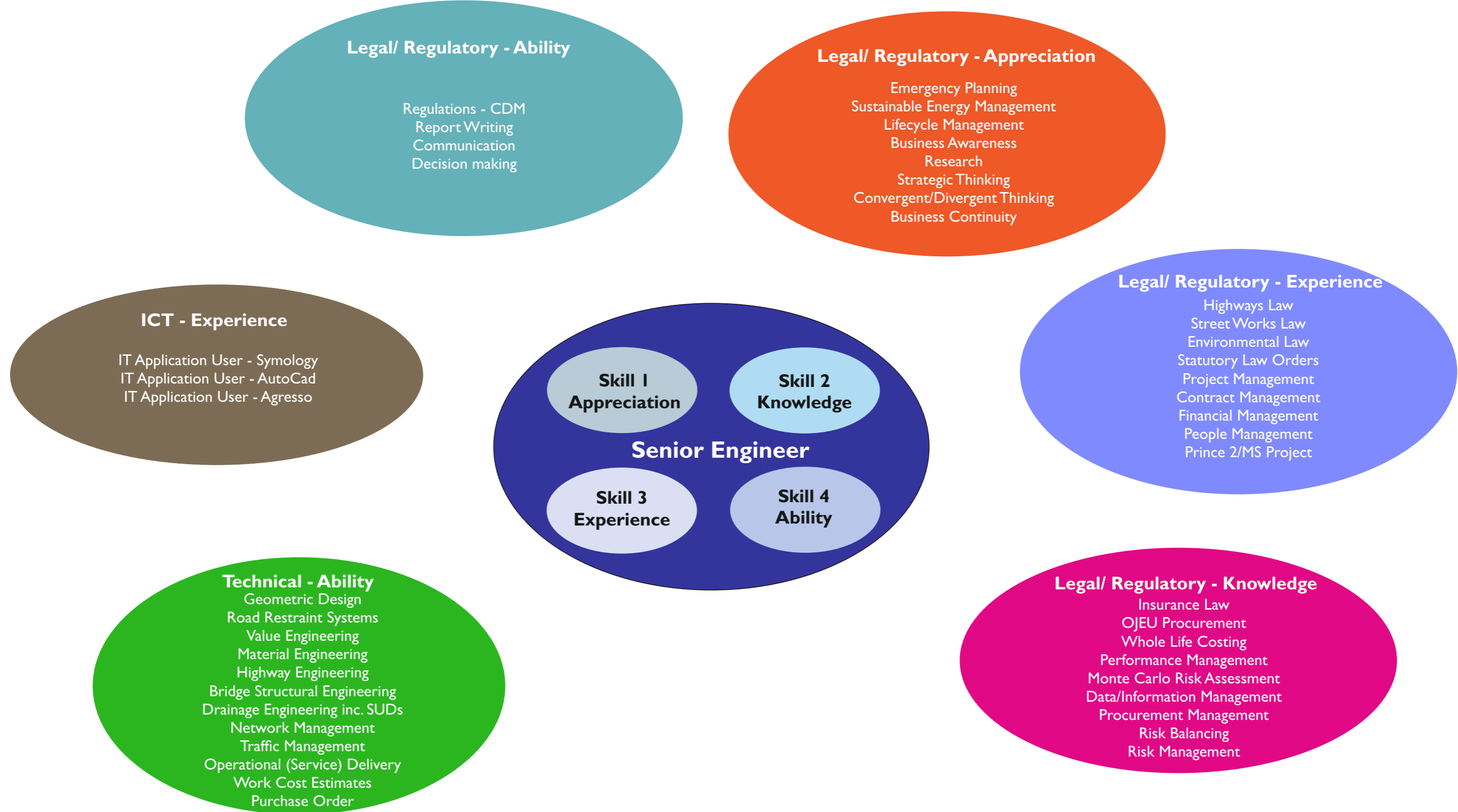
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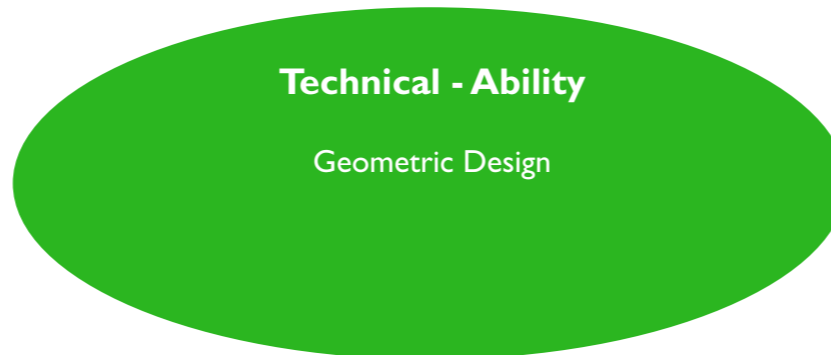
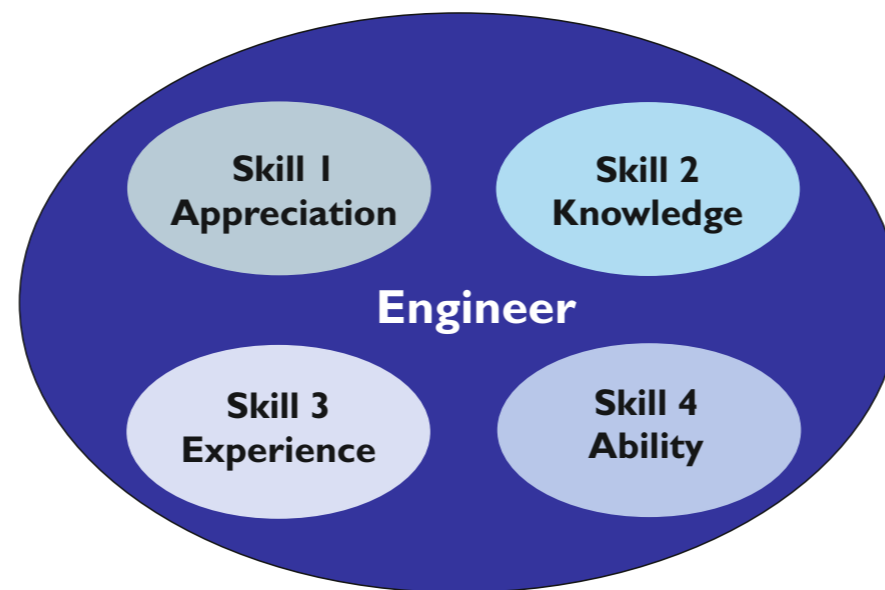
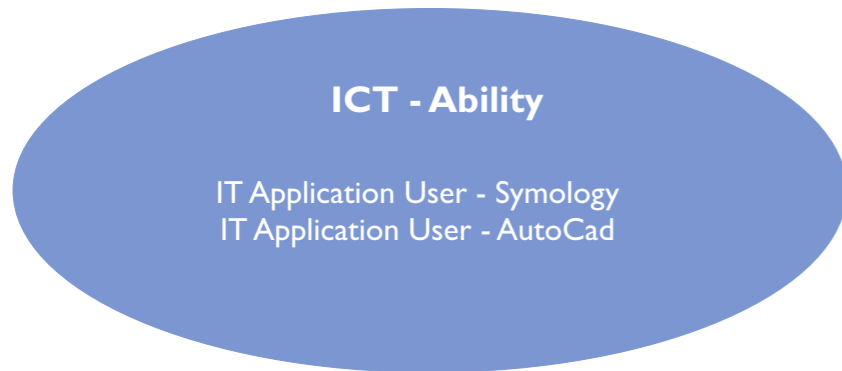


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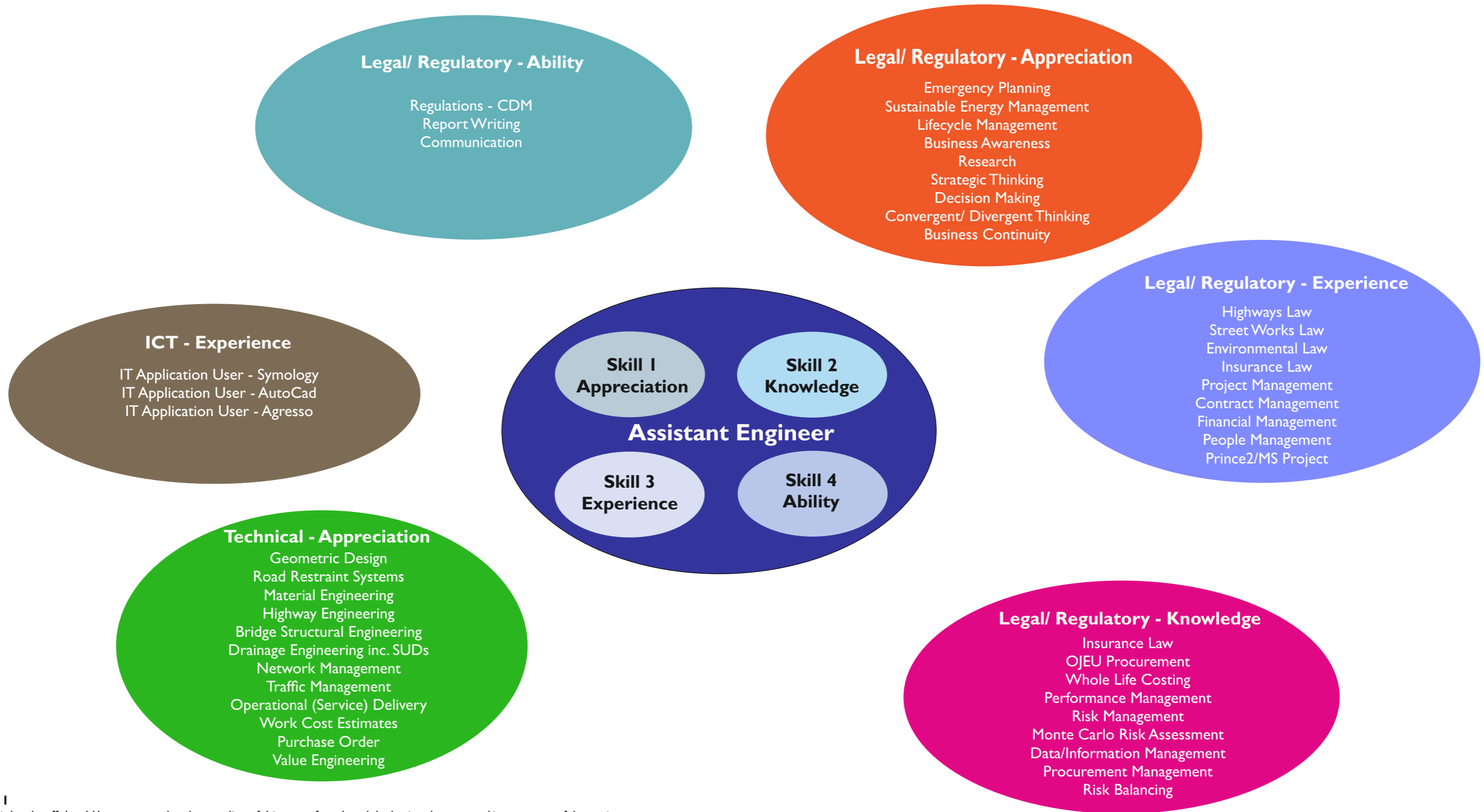


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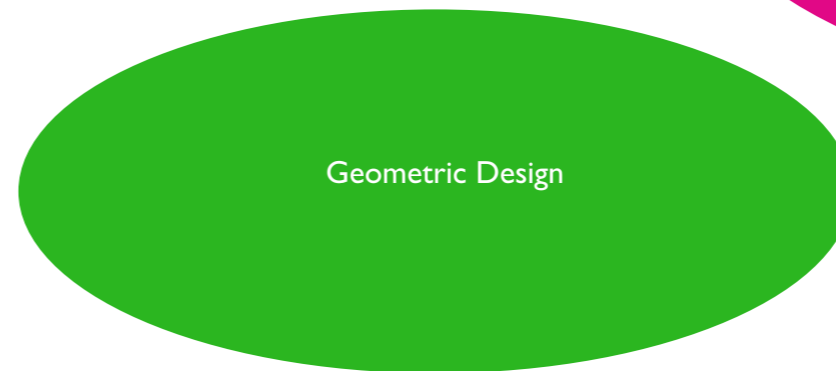
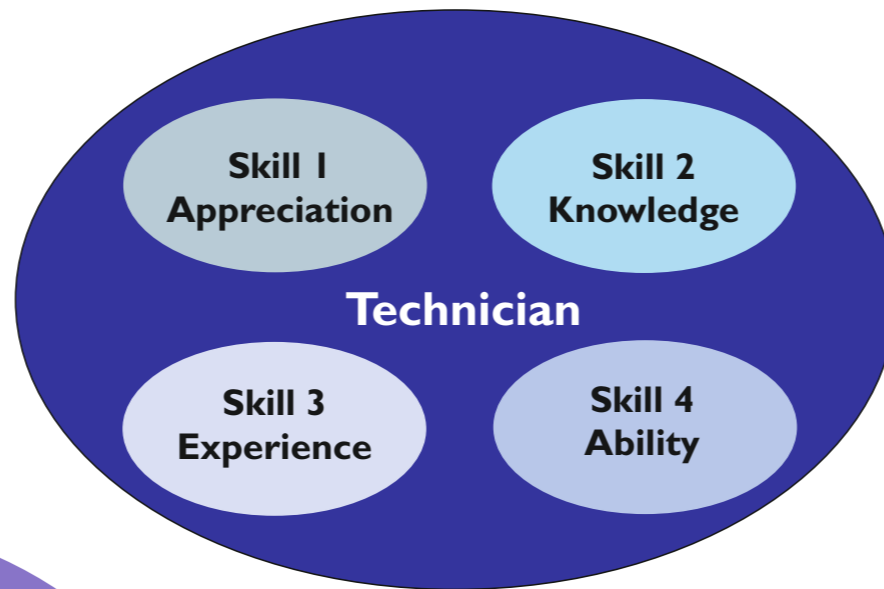
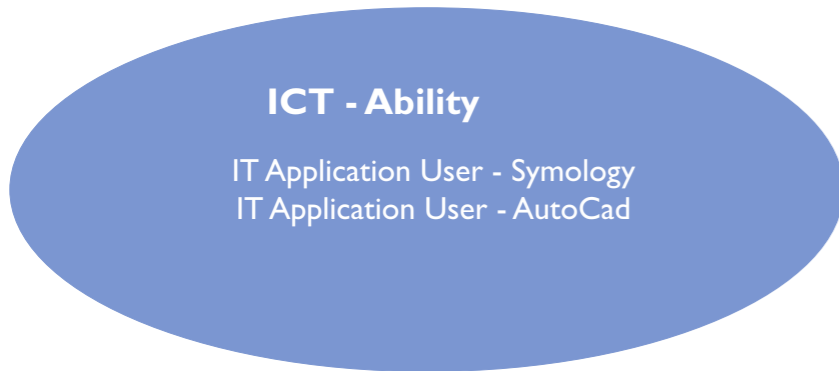


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Here, the requirement is to demonstrate an understanding of the principles involved and to be able to complete tasks and projects in this field independently or under supervision.

**Skill 4**  
This level requires staff to demonstrate a full understanding of the principles to be able to complete tasks and projects in this field independently and be able to guide, train and supervise



**Skill 1**  
At this level staff should have a general understanding of this area of work and the basic relevance and importance of the topic.

**Skill 2**  
In addition to having a general awareness of the topic, this level requires staff to know how work is carried out in this field, and to be able to do so with guidance and supervision.

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**Skill 4**  
This level requires staff to demonstrate a full understanding of the principles to be able to complete tasks and projects in this field independently and be able to guide, train and supervise

**ICT - Ability**  
IT Application User - Symology

**Legal/ Regulatory - Appreciation**  
Highways Law  
Street Works Law  
Lifecycle Management  
Data/Information Management  
Financial Management  
Risk Balancing

**Legal/ Regulatory - Experience**  
Decision Making  
Communication

**ICT - Appreciation**  
IT Application User - Agresso

**Highways Inspector**

**Skill 1  
Appreciation**      **Skill 2  
Knowledge**

**Skill 3  
Experience**      **Skill 4  
Ability**

**Technical - Appreciation**  
Geometric Design  
Road Restraint Systems  
Value Engineering  
Material Engineering  
Highway Engineering  
Bridge Structural Engineering  
Drainage Engineering inc. SUDS

**Technical - Knowledge**  
Operational (Service) Delivery  
Work Cost Estimates

**Technical - Experience**  
Network Management  
Traffic Management

**Skill 1**  
At this level staff should have a general understanding of this area of work and the basic relevance and importance of the topic.

**Skill 2**  
In addition to having a general awareness of the topic, this level requires staff to know how work is carried out in this field, and to be able to do so with guidance and supervision.

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## Southend-On-Sea Borough Council

### Highways Infrastructure Asset Data Management Strategy

September 2016

#### Purpose of the Strategy

The purpose of our Highways Infrastructure Asset Data Management Strategy is to effectively manage our transport infrastructure assets by proactively collecting all relevant data to a frequency and level of quality that ensures Southend's asset management policy is delivered.

It is acknowledged that all data will be held in suitable decision support systems (DSS), is accessible to all those requiring data access and data security is in accordance with the Southend corporate data security policy.

We have developed this Data Management Strategy so that we can:

- Complete regular life-cycle planning scenarios for all transport infrastructure assets to support Southend's investment modelling.
- Hold and update the most relevant transport infrastructure asset inventory attributes in line with best practice.
- Undertake regular condition surveys of transport infrastructure assets in accordance with the respective Codes of Practice.
- Process all inventory and condition data to develop prioritised annual, 3 and ultimately 5 year works programmes.
- Calculate the Southend transport infrastructure asset valuation in line with the CIPFA asset valuation requirements.

In developing this Strategy, it is our ambition is to:

- Maintain in a serviceable condition and fit for purpose, Southend's transport infrastructure assets.
- Run regular lifecycle planning scenarios for its transport infrastructure assets to inform Southend's investment modeling.
- Establish an accurate transport infrastructure asset inventory to support its decision making.
- Collect transport infrastructure asset condition data using accredited systems and processes and that the outputs are a priorities works programme using optimum interventions.
- Understand the depreciated replacement cost and gross replacement costs for our transport infrastructure assets.

## Strategic Priorities

In 2015 we published our Council Plan and Annual Report setting out the Council's recent achievements, and the need to make significant revenue savings and to look forward for the next three years. It also contains our Corporate Values as set out below:

## Living our Values

Our Corporate Values guide how we go about our work. They provide a framework for everything we do from day-to-day activities to key business decisions:

<b>Excellence:</b>	We aspire for excellence in our work
<b>As one:</b>	We work as one organisation responsible
<b>Responsible:</b>	We are all responsible for the performance of our organisation open & honest
<b>Open and Honest:</b>	We are open, honest and transparent, listening to other's views customer care
<b>Customer Care:</b>	Good customer care is at the heart of everything we do
<b>Supportive:</b>	We support, trust & develop each other

To support the successful delivery of our Corporate Values, it is important that we have a clear understanding of the scope of our transport infrastructure assets, its condition, the optimum investment need, and that the subsequent output is an optimum annual works budget. These will be aligned with the strategic asset management priorities and delivers our asset management policy.

The key data management priorities for Southend on Sea Borough Council are that:

- All critical asset data will have a designated owner, and that owner have responsibilities to comply with the corporate and local data management requirements.
- All data whether procured or from internal condition surveys, is appropriately date stamped and its 'ownership' is with Southend.
- Data collection is undertaken on a risk based approach for frequency, method of collection and the reliability and repeatability of outputs.
- All data collected, or processed is held in the most appropriate DSS for the type of critical asset the data relates.
- We will undertake a review of the present number of DSS used to hold transport infrastructure data so that we can reduce system overlap, multiple uploading of data, and the costs of holding multiple system licences.
- We will archive and dispose of critical asset data only when data has been superseded, the relevant asset has been disposed of and the archived data to be disposed complies with any corporate requirements.
- All data quality, updating, collection and processing is reviewed on a regular basis in accordance with any corporate requirements.

## The Highways Infrastructure Asset Management Plan (HIAMP)

The various documents that make up our HIAMP for a local highway authority is known as the HIAMP. Our HIAMP contains transport infrastructure asset specific policies and data relating to

our respective transport infrastructure asset condition and inventory. These policies are supported by evidence, generally in accord with national policies and affordability which are set out as the affordable levels of service for Southend. Data management is required at various stages in the asset management policy preparation, in supporting our HIAMP.

## Delivering our Objectives

This strategy defines our data management objectives:

1. Use the most cost effective asset collection process and DSS in which to invest our increasingly limited resources.
2. Focus on reducing the numbers of asset systems being used to:-
  - o hold critical asset management data and
  - o deliver improvements to the present and future value of the transport infrastructure assets.
3. Increase the number of our asset management staff who are better informed about our transport asset management inventory and condition data and the number who are more proactively involved in using this data to improve the condition of the transport infrastructure.

# Southend-on-Sea Borough Council

Agenda  
Item No.

Report of Deputy Chief Executive (Place)

To  
Cabinet  
On

19<sup>th</sup> September 2017

Report prepared by: Mark Sheppard

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**Adoption of Essex and Southend-on-Sea Waste Local Plan  
Place Scrutiny Committee  
Executive Councillor: Councillor Flewitt  
*A Part 1 Public Agenda Item***

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## **1. Purpose of Report**

- 1.1 To recommend the adoption of the Essex and Southend-on-Sea Waste Local Plan by full Council in October 2017.
- 1.2 If adopted, the Waste Local Plan will form part of the Southend Development Plan. It will therefore provide a set of up-to-date local planning policies for positively managing waste related development in Southend and will be used to assess development proposals across the Borough.

## **2. Recommendation**

- 2.1 That all the recommendations of the Inspector's Report at Appendix 1 and the revised version of the Essex and Southend-on-Sea Waste Local Plan set out in Appendix 2 be agreed.
- 2.2 That Cabinet recommends that full Council adopts the Essex and Southend-on-Sea Waste Local Plan as set out in Appendix 2, in accordance with Planning Regulations.
- 2.3 Note that the Essex and Southend-on-Sea Waste Local Plan Proposed Submission version, approved by Council for publication and submission in February 2016, has been amended as per:
  - a) the main modifications recommended by the Inspector in her report and agreed for consultation under delegated authority in 2016 (attached at Appendix 1);
  - b) The minor modifications agreed for consultation under delegated authority in 2016 (attached at Appendix 3); and
  - c) The further minor modification (attached at Appendix 4).

### **3. Background**

#### ***The Essex and Southend-on-Sea Waste Local Plan***

- 3.1 The Essex and Southend-on-Sea Waste Local Plan (WLP) will replace the existing Essex and Southend Waste Local Plan 2001. Once adopted, the WLP will provide the Council with up-to-date planning policies to be used to guide, appraise and determine waste related planning applications within the administrative boundaries of Essex and Southend-on-Sea (referred subsequently as the Plan area).
- 3.2 The Plan addresses not only Local Authority Collected Waste, which forms a relatively small portion of the overall waste volumes generated in Essex and Southend, but also Commercial and Industrial Waste, Construction and Demolition Waste, Hazardous and radioactive waste. The aim is to prioritise waste prevention, re-use and recycling ahead of other types of recovery, and finally disposal.
- 3.3 In summary the WLP seeks to:
- Ensure that opportunities for waste to be re-used, recycled and recovered are maximised; and
  - Provide policies and a supply of sites to meet net self-sufficiency to ensure growth in Essex and Southend-on-Sea, but which have the least harming effects on the environment and social infrastructure.
- 3.4 No sites are proposed to be allocated within the administrative area of Southend-on-Sea. However, the WLP includes locational criteria policies, i.e. development management policies and 'Areas of Search', to afford greater flexibility for the delivery of waste management facilities over the plan period. Areas of Search comprise existing employment areas considered to be suitable, in principle, for a waste management use. Four Areas of Search have been identified within and near to Southend-on-Sea, including:
- Stock Road (Southend)
  - Temple Farm (Southend)
  - Rochford Business Park – west side Aviation Way (Rochford)
  - Michelins Farm (Rochford)
- 3.5 Locational criteria policies identify where waste management development may also be appropriately located within the Plan area, when proposals are brought forward on non-allocated sites or outside of an 'Area of Search'. The WLP also provides support for proposals on existing permitted waste sites, subject to meeting other policies in the WLP.

### **Examination in Public**

- 3.6 In February 2016, both Southend Borough Council and Essex County Council approved the Proposed Submission version of the WLP for public consultation and subsequent submission to the Secretary of State for Examination.
- 3.7 In June 2016, the Plan was submitted to the Secretary of State who appointed a Planning Inspector to undertake the formal examination process. The Inspector conducted hearing sessions over a two week period in September and October 2016.
- 3.8 During the hearing sessions the Inspector identified a number of modifications were needed to ensure the Plan was sound, legally compliant and suitable for adoption by the Councils.
- 3.9 In December 2016, the main modifications identified by the Inspector along with a number of minor modifications were agreed under delegated authority by the Deputy Chief Executive (place) and Executive Councillor for Housing, Planning and Public Protection Services (now Executive Councillor for Housing, Planning and Sustainability), and authorised a period of public consultation on the proposed modifications, which took place between 5 January and 16 February 2017.
- 3.10 The public consultation on the modifications received a total of 553 responses from 372 separate organisations/individuals. The Inspector requested that all responses be submitted to her for consideration. Two documents (Appendix 5 and 6 of this report) were supplied to the Inspector on 20 March 2017.

### **Inspector's Recommendations**

- 3.11 The Inspector has considered the WLP, all comments submitted prior to and during the examination process, including the consultation on the modifications, and issued her final report (Appendix 1). The final Report concludes that the Plan is legally compliant and is sound if it is adopted with main modifications, and provides an appropriate basis for waste planning within Essex and Southend-on-Sea. These modifications are included as Appendix 1 and 2 of the Inspectors' Report.
- 3.12 Three of the modifications that were consulted upon have been subject to additional change by the Inspector, in response to the public consultation. These include changes to MM21 – Sunnymead, Elmstead and Heath Farm and MM23 – Dollyman's Farm site allocation, which are not located within Southend-on-Sea; and MM13 – Policy 10 Development Management Criteria. The additional change to MM13 – Policy 10 is as follows:
  - MM13- Policy 10: As a result of comments from Natural England received during the public consultation in Jan- Feb 2017, the Inspector has recommended that Policy 10 criterion b) is further reworded to clarify the

relevant considerations with respect of water quantity and quality in relation to planning applications for waste management. The Inspector considered that the further modification is necessary to satisfy the adequate protection of water resources in terms of quantity as well as quality.

<b>Policy 10 criterion b (amended wording as subject to public consultation in January 2017)</b>	<b>Policy 10 criterion b (as recommended by Inspector's Report)</b>
<p>b) the quality of water within water bodies, with particular regard to:</p> <ul style="list-style-type: none"> <li>• preventing the deterioration of their existing status; or</li> <li>• failure to achieve the objective of 'good status', and</li> <li>• the quantity of water for resource purposes within water bodies'</li> </ul>	<p>b) water resources, with particular regard to:</p> <ul style="list-style-type: none"> <li>- the quality of water within water bodies: <ul style="list-style-type: none"> <li>• preventing the deterioration of their existing status; or</li> <li>• failure to achieve the objective of 'good status', and</li> </ul> </li> <li>- the quantity of water for resource purposes within water bodies</li> </ul>

3.13 In addition to the main modifications proposed by the Inspector a number of minor modifications are proposed to address minor matters of consistency, typographical errors and updates to supporting text. These were also subject to public consultation in Jan- Feb 2017.

3.14 The consultation responses are set out in Appendix 5 and the Council's response to those responses are set out in Appendix 6. With the exception of the representation from Magnox/Nuclear Decommissioning Authority, no changes to these minor modifications are proposed as a result of any public comments.

3.15 Magnox/NDA responded to the public consultation in early 2017 to confirm their support for the modifications as a whole but requested that references to Radioactive Waste in the Plan be updated to refer to the latest published UK Strategies covering such waste as published in 2016. The current references are based on older Strategies and the update proposed by Magnox would ensure the Plan is up to date and includes up to date information. The further minor modifications proposed are set out in Appendix 4.

3.16 All of these modifications have been incorporated into a final version of the WLP (Appendix 2), which is recommended for adoption.

#### **4. Other Options**

4.1 Cabinet could choose not to do anything - work on the WLP would cease and the joint planning authorities would be forced to rely on national planning



policy and guidance in making planning decisions in future. This option also risks penalties for the Councils levied by the Government for the absence of an up to date Waste Local Plan. This option would not lead to the adoption of a locally derived Waste Local Plan, which is at a very advanced stage of production.

- 4.2 Cabinet could choose not to support the conclusions of the Inspector's Report and recommend to full Council not to adopt the Plan. The Council would then need to decide on an alternative approach to preparing a Waste Local Plan, revisiting existing evidence and undertaking potentially significant additional public consultation. Such a process would likely result in a delay measured in years. This option also risks penalties for the Councils levied by the Government for the absence of an up to date Waste Local Plan.

## **5. Reason for Recommendation**

- 5.1 This report recommends that Cabinet supports the conclusions of the Inspector's Report, and recommend to full Council that the Plan be adopted. It is clearly advantageous for SBC to have a new Waste Local Plan in place as soon as possible. This would avoid the risk of new planning applications for waste related development being considered without an up to date Plan – one of the consequences being a lack of certainty regarding where new waste development will take place in the future, and whether such development is indeed required in the Plan area.

- 5.2 Essex County Council resolved to adopt the WLP on 11 July 2017.

## **6. Corporate Implications**

- 6.1 Contributions to the Council's Vision & Corporate Priorities

- 6.1.1 By placing the waste hierarchy (including waste prevention and recycling) at the core of the document, the WLP, once adopted, will assist in reducing the amount of waste going to landfill. The WLP will ensure that future waste provision within Southend and Essex is appropriately met, situated in the right locations, and has a minimal impact on the environment. The WLP will assist in 'Creating a better Southend' and contribute to the 'Clean' and 'Prosperous' corporate priorities.

- 6.2 Financial Implications

- 6.2.1 The main costs have already been met for the previous rounds of consultation and the examination. There will be a minor cost associated with adoption of the WLP, which will be met from existing agreed budgets.

- 6.3 Legal Implications

- 6.3.1 The adoption of the WLP necessitates compliance with the Town and Country Planning (Local Planning) (England) Regulations 2012, a process which will be duly followed.

6.3.2 As with any decision made by the Council there is also the potential for judicial review following the adoption of the document in the future at Full Council. The Council must therefore ensure that the correct procedures are followed to reduce the potential risk of such a challenge.

#### 6.4 People Implications

6.4.1 Staff resources from the Council's Strategic Planning team have been required in order to produce the WLP, particularly during document preparation, consultation stages and examination. Further staff resources will be required to take the document to adoption stage and have been allocated.

#### 6.5 Property Implications

6.5.1 The WLP will seek to safeguard the following existing Waste Management sites within Southend:

- Waste Transfer Station at the Central Cleansing Depot Eastern Avenue (Council owned);
- Waste Transfer Station at Hadleigh Salvage, Plot 9 Stock Road;
- Recycling Centres for Household Waste at Leigh Marshes (Council owned); and
- Recycling Centres for Household Waste at Stock Road (Council owned).

#### 6.6 Consultation

6.6.1 The requisite statutory consultation process has been followed through the preparation of the WLP.

#### 6.7 Equalities and Diversity Implications

6.7.1 An Equalities Impact Assessment was completed as part of the WLP process (Appendix 7).

#### 6.8 Risk Assessment

6.8.1 If the WLP is not adopted, decisions on waste related planning proposals will be made in accordance with the national policy and guidance, which includes the risk that decisions may not take into account the particular needs and requirements of Southend.

#### 6.9 Value for Money

6.9.1 There have been significant beneficial impacts on value for money by working in partnership with Essex County Council. Costs have been apportioned between the Authorities in the ratio of ECC 90%: SBC 10%, which broadly reflects the ratio of population. This also allows the expertise of the Planning teams of SBC and ECC to be utilised.

## 6.10 Community Safety Implications

6.10.1 The WLP will contain a number of locational criteria and development management policies to ensure that, when adopted, future identified waste development is managed to limit and avoid any adverse impacts. The environmental regulatory framework, including pollution prevention and control and waste management licensing, administered by the Environment Agency, still applies to defined waste development proposals.

## 6.11 Environmental Impact

### 6.11.1 *Sustainability Appraisal*

6.11.2 Sustainability Appraisal (SA) is an important part of the plan making process. It assesses the environmental, economic and social implications of policies and options in the production of plans. The SA forms part of the evidence base for the development of the WLP and has been used, alongside other evidence, to aid decision-making.

6.11.3 The SA of the WLP that was submitted for examination found that the spatial strategy will have significant positive impacts on the sustainable management of waste, the sustainable transportation of waste, and economic growth. Furthermore, the plans policies were concluded to have significant positive impacts on all of the Sustainability Objectives.

6.11.4 Overall, the SA recommendations relating to how to improve sustainability in the WLP policies have been taken into account. A copy of the SA is attached at Appendix 8.

6.11.5 An addendum to the SA (Appendix 9) was produced that considered the impact of the proposed modifications and concluded that none of the Plan's proposed minor modifications will give rise to any significant sustainability effects. When main modifications were identified as having sustainability effects, further appraisal has been undertaken and consideration given to reasonable alternatives, concluding that there are a number of significant positive impacts associated with minimising environmental effects and in the sustainable management of waste.

### 6.11.6 *Habitats' Regulations Screening Report*

6.11.7 Southend-on-Sea and other districts in Essex County have a number of important designated sites for nature conservation. Habitats screening is an assessment of the potential significant effects of a policy on European Sites designated for their nature conservation importance. These include Special Areas of Conservation, Special Protection Areas, and international Ramsar sites. A policy should only be approved after determining that it will not adversely affect the integrity of such sites. Each policy has been assessed for

any significant impacts on European sites within or outside Southend-on-Sea and Essex.

6.11.8 The Habitats Regulations Screening Report (HRA) for the WLP considered that the WLP provides an adequate level of flexibility and policy provision and there is a significant degree of certainty that the Plan can be achieved within the requirements of the Conservation of Habitats and Species Regulations 2010.

## **7. Background Papers**

7.1 The Town and Country Planning (Local Development) (England) Regulations 2012

7.2 Planning and Compulsory Purchase Act 2004

7.3 Southend on Sea Local Development Scheme timetable 2017

7.4 Southend on Sea Statement of Community Involvement 2013

7.5 Essex and Southend Waste Local Plan 2001

7.6 Southend-on-Sea Cabinet Report: Essex and Southend-on-Sea Replacement Waste Local Plan – Proposed Submission Document 2016

## **8. Appendices**

**Appendix 1:** Inspectors Report on the Essex and Southend-on-Sea Waste Local Plan

**Appendix 2:** Essex and Southend-on-Sea Waste Local Plan

**Appendix 3:** [Waste Local Plan Schedule of Modifications](#)

**Appendix 4:** Further Minor Modifications

**Appendix 5:** [Modifications Consultation - Schedule of all Representations](#)

**Appendix 6:** [Modifications Consultation – Comments of the Waste Planning Authorities](#)

**Appendix 7:** [Equality Impact Assessment](#)

**Appendix 8:** [Sustainability Appraisal Non-Technical Summary](#)

**Appendix 9:** [Sustainability Appraisal Addendum](#)

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# **Report to Essex County Council and Southend-on-Sea Borough Council**

**by Mrs KA Ellison, BA, MPhil, MRTPI**

**an Inspector appointed by the Secretary of State for Communities and Local Government**

**Date**

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Planning and Compulsory Purchase Act 2004

(as amended)

SECTION 20

## **REPORT ON THE EXAMINATION INTO THE ESSEX COUNTY COUNCIL AND SOUTHEND-ON-SEA BOROUGH COUNCIL**

### **REPLACEMENT WASTE LOCAL PLAN**

Document submitted for examination on 10 June 2016

Examination hearings held between 27 September and 7 October 2016

File Ref: PINS/Z1585/429/5

## Abbreviations Used in this Report

AA	Appropriate Assessment
CDE	Construction, demolition and excavation waste
CHP	Combined Heat and Power
DtC	Duty to Co-operate
ECC	Essex County Council
EoEWTAB	East of England Waste Technical Advisory Body
FPC	Further Proposed Change
HRA	Habitats Regulation Assessment
IWMF	Integrated waste management facility
LACW	Local Authority Collected Waste
LDS	Local Development Scheme
LP	Local Plan
MM	Main Modification
NPPF	National Planning Policy Framework (NPPF)
NPPW	National Planning Policy for Waste
PROW	Public Rights of Way
RWLP	Essex and Southend-on-Sea Replacement Waste Local Plan
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SoS	Southend-on-Sea Borough Council
SSSI	Site of Special Scientific Interest
tpa	tonnes per annum
WDI	Waste Data Interrogator
WPA	Waste Planning Authority

## **Non-Technical Summary**

This report concludes that the Essex and Southend-on-Sea Replacement Waste Local Plan provides an appropriate basis for waste planning within the two administrative areas, provided that a number of main modifications [MMs] are made to it. The Councils have specifically requested me to recommend any modifications necessary to enable the plan to be adopted.

All of the modifications to address this were proposed by the Councils and were subject to public consultation over a six-week period. I have recommended their inclusion in the Plan after considering all the representations made in response to consultation on them.

The Main Modifications can be summarised as follows:

- Updating the figures on the waste capacity gap and clarifying the policy on net self-sufficiency;
- The deletion of one strategic allocation and the inclusion of another, together with updates to the details of several sites;
- Ensuring the effectiveness of policies concerning Areas of Search, Waste Consultation Areas, Locational Criteria and Development Management.

## Introduction

1. This report contains my assessment of the Essex and Southend on Sea Replacement Waste Local Plan in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (paragraph 182) makes clear that to be sound, a Local Plan should be positively prepared; justified; effective and consistent with national policy.
2. The starting point for the examination is the assumption that the waste planning authorities have submitted what they consider to be a sound plan. The basis for my examination is the Essex and Southend-on-Sea Replacement Waste Local Plan: Pre-Submission Draft, which is the document that was published for consultation in March 2016.

## Main Modifications

3. In accordance with section 20(7C) of the 2004 Act the Councils requested that I should recommend any main modifications [MMs] necessary to rectify matters that make the Plan unsound and thus incapable of being adopted. My report explains why the recommended MMs, all of which relate to matters that were discussed at the examination hearings, are necessary. The MMs are referenced in bold in the report in the form **MM1**, **MM2**, **MM3** etc, and are set out in full in the Appendix.
4. Following the examination hearings, the Councils prepared a schedule of proposed MMs and this schedule was subject to public consultation for six weeks. I have taken account of the consultation responses in coming to my conclusions in this report and, in this light, I have made some amendments to the detailed wording of the main modifications. In addition, it became clear that there was a need to correct the figure for the total of inert waste recycling capacity which was to be allocated through the Plan, as set out in the 'Waste Challenge at a Glance' section. These amendments and corrections do not significantly alter the content of the modifications as published for consultation, nor do they undermine the participatory processes and Sustainability Appraisal (SA) that has been undertaken. Where necessary, I have highlighted these amendments in the report.

## Policies Map

5. The Councils must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Councils are required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises the Submission Policies Map June 2016 (CD 3) and the plans within Appendices B and E of the Pre-Submission Draft, which set out the development principles for the allocated sites and the areas of search (CD 1B, 1E & 1F).
6. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend main modifications to it.



However, a number of the published MMs to the Plan's policies require further corresponding changes to be made to the policies map. In addition, there are some instances where the geographic illustration of policies on the submission policies map is not justified and changes to the policies map are needed to ensure that the relevant policies are effective. These further changes to the policies map were published for consultation alongside the MMs (MC-1).

7. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include all the changes proposed in the RWLP and the further changes published alongside the MMs.

## **Assessment of Duty to Co-operate**

8. Section s20(5)(c) of the 2004 Act requires that I consider whether the Councils complied with any duty imposed on them by section 33A of the 2004 Act in relation to the Plan's preparation.
9. The key cross-boundary issues for the RWLP include the movement of waste across administrative borders and the need for and location of new waste capacity in the Plan area. Engagement with relevant bodies has taken place during the Plan-making process, such as that undertaken in 2012 and 2014 with neighbouring Waste Planning Authorities (WPA). This concerned cross-boundary waste movements and was in line with arrangements agreed with the East of England Waste Technical Advisory Body (EoEWTAB). At the time of the hearings, a Memorandum of Understanding was being prepared with the North London Planning Authorities. The Councils have also taken part in separate discussions concerning nuclear waste movements.
10. The regular meetings of the Essex Planning Officer Association (Policy Forum) have provided opportunities for engagement with District, Borough and City Authorities within the Plan area. During the preparation of the Plan, regard was had to the existing local planning context, with meetings taking place with individual authorities. One Authority (Basildon) pointed to the limited level of engagement at the level of elected members. However, it is clear that the issues of particular concern within that Borough as to the geographical distribution of waste management facilities in the Plan area and the implications of recently approved facilities for the locality in which they are situated have been properly considered, even if areas of disagreement remain. The strength of these concerns underlines the value of continuing, effective collaboration at all levels and I am satisfied that the WPAs have demonstrated an acceptable overall level of engagement as part of the plan-making process.
11. I conclude that the WPAs have worked collaboratively with other authorities and bodies and have co-operated effectively through a continuous period of engagement. They have fulfilled the duty to co-operate with regard to the Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan.

## Assessment of Soundness

### Preamble

12. The RWLP provides the key principles and policies to guide the future management of waste in the Plan area up until 2032. Preparation took place from 2009 to 2011 and then, after a two year pause, recommenced in 2013. The Plan contains the spatial vision, strategic objectives, spatial strategy, allocations, development management policies and a monitoring framework.
13. The Plan area comprises the administrative area of Essex County Council, where the two-tier administrative system includes 12 Councils, as well as the unitary authority of Southend-on-Sea Borough Council. It is an area which is expected to see considerable growth not only in housing but also through major infrastructure projects. The Metropolitan Green Belt covers most of the districts of Epping, Brentwood, Basildon and Rochford as well as parts of Chelmsford City, Castle Point, Harlow, Uttlesford and Southend-on-Sea. In addition, there are 17 European sites (Special Protection Areas and Special Areas for Conservation), fourteen other international sites (Ramsars) and 85 Sites of Special Scientific Interest (SSSI).

### Main Issues

14. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings, I have identified five main issues upon which the soundness of the Plan depends.

#### **Issue 1 – Whether the Plan has been positively prepared and is justified, effective and consistent with national policy.**

15. The Plan has been positively prepared in that it is based on a strategy which seeks to meet objectively assessed requirements, as summarised in the section '*The Waste Challenge – at a glance*' (RWLP paragraphs 4.21-4.23). This sets out the types and quantities of waste expected to arise during the Plan period not only within the Plan area but also in terms of cross-boundary movements, the most significant of which are with London. In the period since the Pre-Submission Draft was published, further data has become available from the North London Waste Planning Authorities which indicates that Essex is likely to be relied upon to accept a greater quantity of waste than had previously been expected. Whilst the assessment assumes that recent patterns of waste flows will continue, it also takes into account the projected continued fall in the level of waste to be exported. Given the extent of cross-boundary movement and the expectation in NPPW that plans should be based on the best available data, the summary set out in paragraphs 4.21-4.23 should be revised to incorporate the most recent information and to ensure consistency with the evidence base.
16. Prior to publication of the main modifications, the Councils had confirmed that the total allocated capacity for inert waste recycling within the Plan was 490,000tpa. Due to an error in the data for one of the sites (Sandon), this was later altered to 640,000tpa and that higher figure was used during the consultation on the proposed main modifications. The Councils have since confirmed that the correct figure should be 490,000tpa. Since this is a matter of fact, I have included the correct figure in the modification (**MM1**).

17. For the most part, this update leads to relatively modest adjustments in the data, with the notable exception of the gap for the management of inert waste, which increases from 2.58mt to 7.05mt. In line with the waste hierarchy, it is assumed that maximum use will be made of recycling facilities, so that only the remaining inert waste would be sent to landfill. Through the Areas of Search in policy 4 and the development management criteria in policies 5 and 6, the Plan makes provision for new recycling facilities to be brought forward. Policy 9 would allow for additional disposal facilities to be considered, subject to various criteria, including consideration against the waste hierarchy. Thus, whilst the updated information indicates that the capacity gap for the management of inert waste is greater than originally assessed, it does not necessarily follow that further sites for landfill should be allocated. The underlying strategy of the Plan is sound and its focus should continue to be on driving waste up the hierarchy, giving preference to recycling rather than disposal.
18. Although the data also indicates a likely shortfall in capacity for the management of biological waste, this is not expected to persist beyond about 2023, when the Rivenhall facility is projected to come into operation (CED 2 Table 4). My attention was also drawn to the possibility of a Combined Heat and Power facility as part of any proposal for a Dunton Garden Suburb. Whilst this could make a valuable contribution to the overall sustainability of such a development, should it come to fruition, it was clear from the discussion at the hearing that considerable uncertainty remains as to the timing for such a facility and the extent to which it would take waste as a fuel. At this stage, such a project has not been shown to be deliverable, nor are there any reliable arrangements in place to indicate the scale of its contribution to the management of waste. On that basis, I consider that there is insufficient justification for the inclusion of a further allocation for waste management by way of CHP in the RWLP.
19. Significant population and household growth is expected within the Plan area. However, it is both reasonable and consistent with the policy aim of driving waste up the hierarchy for the WPAs to work on the basis that a range of non land-use measures will first be taken to encourage waste minimisation and recycling amongst the residential population. As a result, such growth would not necessarily lead to an increased need for sites for the management of LACW, especially if there is scope for more efficient use of existing sites.
20. The Plan looks to support the recovery of value from waste, in line with the vision of achieving a circular economy. In the allocation of sites, it gives greater priority to the treatment of waste, thus supporting the movement of waste up the hierarchy. Flexibility is to be afforded through Areas of Search (Policy 4) as well as the criteria-based locational policies (Policies 5, 6 and 9). The RWLP seeks to direct new waste development towards the key urban centres, encourages co-location and sets out safeguards for existing sites. Subject to these and other modifications identified in this report, the plan would satisfy the requirements to be positively prepared, justified, effective and consistent with national policy as set out at NPPF paragraph 182.
21. In keeping with NPPW, the Plan is based on the principle of net self-sufficiency where practicable. Whilst this can be applied to the main waste streams, it should be made clear in the Plan that the amount of hazardous and radioactive

wastes generated from within the Plan area mean that such an approach is not practicable for these streams (**MM2**).

22. Sustainability appraisal took place with each iteration of the RWLP, including a review of alternatives, especially in the light of the change in emphasis from regional to local assessments of need, which gave rise to a need for greater flexibility. The Sustainability Appraisal has considered reasonable alternatives and provides clear evidence that the strategy in the Plan is appropriate.
23. The Habitats Regulations Assessment Screening Report (SD-13 and Addendum MC-6) notes that, given the degree of uncertainty as to matters such as timing, scale and type of facility, detailed assessment will have to be undertaken at the planning application stage. However, it concludes that any indirect effects on European sites could be mitigated, provided appropriate protection measures were put in place. In the period since the screening report was prepared, the Wealden judgement ([2017] EWHC 351 (Admin)) has been published. This may well be a factor in the project-specific assessment for the Morses Lane site, where the access road passes within 200m of the Colne Estuary SPA/Ramsar site. Nonetheless, at this stage it is reasonable to conclude that delivery of the allocations in the RWLP could be achieved within the requirements of the Regulations, including in relation to the Strategic Sites and the identified Areas of Search.
24. Having regard to the above, and subject to the main modifications discussed in the remainder of this report, I am satisfied that the Plan has been positively prepared and is justified, effective and consistent with national policy.

## **Issue 2 – Whether the RWLP's strategic objectives are realistic and can be seen to shape the form of the Plan**

25. Reflecting the waste hierarchy, the Plan's strategic objectives include support for waste prevention, re-use, recycling and recovery. Policy 1 sets out the level of need to be planned for. As discussed at the hearing sessions, further information was provided by the North London Waste Planning Authorities. In addition, the Plan should take into account the planning permission for the Rivenhall scheme (February 2016). There is also a lack of clarity in the use of the term 'other waste' within the policy. These matters should be addressed in the interests of the effectiveness of the RWLP (**MM3**).
26. Through Policy 2, the RWLP seeks to provide a mechanism for the consideration of proposed non-waste development on existing and allocated waste management sites, in line with Planning Practice Guidance (ID28-010-20141016). The supporting text explains how the waste consultation zones would be defined and how the policy would be applied. Given the evidence as to the potential for odour issues around Water Recycling Centres, the consultation zone for those facilities should be extended, which would also reflect the advice of the operator. To provide a greater level of certainty, the text should clarify how the policy will apply to small-scale, non-specialist facilities. Within the policy, the final clause should be reworded in the interests of positive planning (**MM4**). In order to be effective, greater clarity is needed in the associated table (Table 21) and the introductory wording to Appendix C concerning those forms of development where consultation is expected, including temporary uses (**MM24** and **MM25**).

27. Subject to these modifications, the RWLP's strategic objectives have been shown to be realistic and to shape the form of the Plan.

### **Issue 3 – Whether the Plan makes adequate provision for new waste management capacity with particular reference to type, location and timing**

#### Strategic allocations

28. Policy 1, as modified, identifies the level of need within the Plan area up to 2032. The WPAs advise that, even though they have sought to make maximum use of suitable sites, some gaps will remain. The most recent information indicates a shortfall in biological treatment capacity until 2024 and for landfill during 2017-18 and again after 2026 (CED 2, Appendix 3). Whilst the Areas of Search policy creates opportunities for further waste treatment capacity to be brought forward as required, scope for landfill facilities is much more limited.
29. The site identification and assessment methodology which underpins policy 3 was based on five stages. The exclusionary criteria identified in stage 1 are not only pragmatic but are also consistent with relevant national policy on flood risk and the protection of natural and historic heritage. According to the methodology, the criteria in Stage 2 (location in the Green Belt and traffic and transportation issues) were not intended to be exclusionary. The approach was designed to make it clear that the WPAs have looked first for suitable sites outside the Green Belt (NPPW paragraph 6). Nonetheless, none of the proposed sites that were within the Green Belt passed this stage, irrespective of the range of uses proposed.
30. NPPF makes clear that the fundamental aim of Green Belt policy includes to keep land permanently open and that the purposes of Green Belt include to assist in safeguarding the countryside from encroachment (paragraphs 79-80). At the same time, NPPW acknowledges that some types of waste management facilities may have particular locational needs. Within the site assessments (SD16) the same score has been assigned to all proposals within the Green Belt. The process has not sought to weigh up the degree of conflict with Green Belt policy against the merits of an individual site for waste management purposes. To my mind, this indicates that this stage did not fully recognise the need, as part of the plan-making process, to reach a preliminary view as to the relative merits of potential sites and possible uses within the Green Belt. As the WPAs point out, proposals on non-allocated sites could still be assessed under the locational and development management policies. However, it is for the Local Plan to provide guidance for future development management decisions. Although a conclusion on whether a proposal satisfies the test of very special circumstances can only be reached at the time a planning application is determined, it is for this Plan to indicate the value of a site's contribution towards any identified gap in capacity.
31. A number of potential waste sites in the Green Belt included proposals which would have involved substantial built elements. Since these would have affected openness or been in conflict with the purposes of the Green Belt, I see no reason to disagree with the scores assigned by those assessments. However, the proposal for a time limited landfill operation at **Dollymans**

**Farm** (L(i)16) would serve to limit any impact on openness and mitigate any conflict with the purposes of the Green Belt. I recognise that, despite having served as a borrow pit, the site does not meet the definition of previously developed land, which is preferred in the site assessment process. However, the Landscape and Visual Appraisal notes that this site has been left at the extracted base levels and that the sculpted landform, steep sided slopes and engineered profile contrast with the gentler rolling profiles of adjacent farmland. Thus, the condition of this site and its potential to improve landscape quality, together with its proximity to areas of growth, indicate that there are other considerations which could be weighed in the balance, when identifying sites to address the capacity gap. Whilst any proposal would still need to be considered on its individual merits, including whether it could satisfy local policies for the management of development in the Green Belt, there is sufficient evidence at this stage to justify the allocation of this site, in order to identify its potential contribution to the management of waste and thus guide future decision-making.

32. As a reflection of arrangements in place at the time the Plan was in preparation, the policy allocates a site at **Wivenhoe** Quarry for inert waste recycling. This was intended to support continued restoration of Wivenhoe, along with a neighbouring site for inert landfill on land at **Sunnymead, Elmstead and Heath Farms**. The operator advises that the advanced state of the restoration at Wivenhoe means that there is now limited justification for the recycling of inert waste at that site in the longer term. If future recycling is to be associated with the restoration of the Sunnymead, Elmstead and Heath Farms site, the opportunity should be taken for it to be more closely related to that site, provided it can be shown that the impact of such development on the surrounding area could be mitigated to an acceptable degree. In order for the Plan to be effective, a strategic allocation should provide a realistic framework to guide the decision-maker. Consequently, that part of the policy which lists sites for inert waste recycling should be altered by the removal of Wivenhoe and the insertion of Sunnymead, Elmstead and Heath Farms.
33. One final matter with this policy concerns the name of the site for biological waste management at Basildon, which should be amended to refer to a Water Recycling Centre.
34. These modifications to policy 3 are covered within **MM5**.

#### Areas of Search

35. The Areas of Search are those existing employment areas which are considered to be suitable in principle for waste management. This is a useful mechanism to create flexibility within the RWLP whilst at the same time encouraging waste management uses within sustainable locations and supporting the movement of waste up the hierarchy. The locations are those with established industrial uses, some of which already contain waste management facilities. The land use planning regime, in conjunction with the pollution control regime, allows the potential impacts of proposals to be properly managed. As such, there is no reason to expect that the prospect of new waste management facilities in these locations would detract from the quality of a locality or deter investment by others.

36. The Areas of Search are based on designations in local plans prepared by other Authorities within the RWLP area. In the interests of effectiveness, it is necessary at paragraph 8.10 to explain how policy 4 could be affected by any future changes arising as a result of the plan-making activity of the other LPAs in the Plan area (**MM6**). Also there is a lack of clarity within the policy itself as to the relationship with policy 10, which deals with general development management considerations. This should be set out, in order to ensure that the policy will be effective. The **Oakwood and Crusader Business Park, Tendring** should be removed from the list of Areas of Search, since evidence was provided to show that it no longer satisfies the selection criteria (**MM7**). The associated Map 51 in Appendix E should also be removed (**MM26**).

#### Spatial distribution

37. The strategic sites and areas of search have been identified in the light of the estimated need for new capacity and after a process which included consideration of alternative spatial strategies and an assessment of the suitability of sites identified through the plan-preparation process. Whilst the distribution across the Plan area is not uniform, it is well-related to the main centres of population, the road network and the growth corridors. I find no basis, therefore, for any lack of soundness in the Plan with regard to the spatial distribution of sites, either in relation to an over-concentration in some areas or a shortage of sites in others.
38. I am satisfied, therefore, that the Plan makes adequate provision for new waste management capacity.

#### **Issue 4 – Whether the plan provides an appropriate decision making framework for the assessment of proposals for waste management facilities**

The criteria-based policies (Policies 5, 6 and 9)

39. These three policies follow a similar approach and deal, respectively, with proposals for enclosed or open waste management facilities and waste disposal. To ensure effectiveness, it should be made clear that these policies apply to sites not allocated in the RWLP and that there will be an expectation that any proposal should be able to show that those allocations or the Areas of Search would be unsuitable or unavailable. To be consistent with the principle of net self-sufficiency, proposals should be expected to demonstrate that at least some proportion of the need for the facility arises from within the plan area. The wording of the final clause should be revised in the interests of positive planning (**MM8, 9, 11**).

#### Radioactive Waste

40. The nuclear power station at Bradwell-on-Sea is in the process of being decommissioned. To ensure the effectiveness of Policy 7, the title should be corrected and it should be clear that management of the waste will be supported (**MM10**).

## Development management

41. Amongst the criteria for the assessment of waste management proposals in Policy 10 is a requirement to assess any impact on the Public Rights of Way network (PROW). To aid effectiveness, the supporting text at paragraph 9.33 should emphasise the scope to enhance or upgrade the PROW network as part of any restoration scheme and state the expectation that there should be no deterioration in quality (**MM12**). With regard to water, criterion (b) should be worded to make clear that relevant considerations consist of preventing deterioration, achievement of 'good' status and effect on quantity of water. It should also be clear from the wording of the policy that the WPAs will seek enhancements, where practicable. This modification, in the form published, did not clearly distinguish between water quality and quantity. This could be achieved through a minor change in the format and wording of this clause, a change which has the support of the Authorities. The policy should also set out those aspects where enhancements would be sought (**MM13**)
42. Although Policy 12 sets out a hierarchy of preferences, it makes no provision for those circumstances where access to the main road network may not be feasible. Such provision was made in earlier iterations of the RWLP. To ensure the policy is effective, a clause should be added which addresses how a proposal will be assessed where access to the main road network is not feasible (**MM14**).
43. With these modifications, the plan will provide an appropriate decision making framework for proposals for waste management facilities.

### **Issue 5 – Whether the RWLP provides appropriate justification for the site-specific allocations and Areas of Search in terms of the sites identified, their environmental acceptability and their deliverability**

44. The predicted shortfall in capacity provides the main justification for the strategic allocations. Further justification for each allocation is contained within the Site Assessment and Methodology Report (SD16) which, in turn, informs the particular considerations for each site. Appendix B contains a table for each allocation which sets out the relevant development principles (RWLP Tables 7-20). These include, as appropriate, the need to address specific matters such as relationships with heritage assets, access arrangements and potential effects on living conditions. Where an allocation has the potential to give rise to such impacts, the site assessments show that it could reasonably be expected that objections could be addressed either through the design of any proposal or by way of condition. I consider that the methodology used in the site assessment process provides a sound basis for each allocation.
45. Except where indicated in the following section, I am satisfied that the site assessments have demonstrated that the allocations are sound and deliverable. However, the following modifications are necessary to ensure that the development principles for each allocation are effective and justified.



Table 8, Bellhouse Landfill Site

46. Within this table, the indicative scale of the inert landfill facility should be expressed in tonnes per annum rather than the overall volume and the correct data as to estimated availability should be shown (**MM15**).

Table 11, Little Bullocks and Crumps Farm, Great and Little Canfield

47. Corrections should be made to this table to ensure that the site size and the defined area for site 1 are consistent with the Minerals Local Plan. Map 11 should be amended accordingly. In addition, the availability of site 3 and the life of sites 2 and 3 should be revised so that they are consistent with the most up to date information.
48. The Minerals Local Plan anticipated that restoration of the existing quarry would be completed before extraction commenced elsewhere. In contrast, the RWLP expects site 2 to become available in the short term, with sites 1 and 3 becoming available in the medium term. It is the data on the capacity gap which provides sufficient justification for the revised approach within the RWLP. Although doubts were expressed as to the viability of the extraction of the mineral resource, the best information currently available is that mineral extraction will proceed. Whilst the approach within the RWLP does raise further issues, especially in terms of potential cumulative impact on local amenity, this has been recognised through the site assessment process and is on the whole suitably addressed through the issues and opportunities for each site, which are set out below Table 11.
49. The exception to this concerns site 2, which includes a clause that seeks to control the type of hazardous wastes which could be accepted. National policy is clear that waste planning authorities should not concern themselves with the control of processes, which are a matter for the pollution control authorities. This would include the range and types of waste which could be accepted. In order to be consistent with national policy therefore, the first bullet point for site 2 should be deleted (**MM16**). In addition, in the interests of effectiveness, the HRA should refer specifically to the need to ensure that there would not be an adverse impact on water quality.

Table 14, Morses Lane, Brightlingsea

50. This site, towards the edge of Brightlingsea, adjoins an existing waste operation but is also within a short distance of a supermarket, school and a residential area. The main access route into Brightlingsea is the B1029 which carries high levels of traffic.
51. By giving greater weight to the proximity of housing and the school, the revised site assessment more accurately reflects the sensitivity of the location. In this respect, I note the reports from residents that they already experience some adverse effects from the existing operation. The development principles contained in Table 14 should set out an expectation that any further waste management development would be enclosed, in order to minimise the risk of cumulative impacts. Given the present servicing arrangements for the supermarket, any future development should also be required to have regard to impacts on neighbouring land uses, including the adjacent retail facility (**MM17**). The allocation would generate additional traffic along the B1029.

However, despite the characteristics of that route, it forms part of the main road network and no technical evidence has been provided to show that such additional vehicle movements would place unacceptable pressure on the local road network.

Table 15, Newport Quarry

52. It is proposed to restore this chalk quarry through landfill with inert waste, including creation of lowland calcareous grassland, which is a priority habitat. Greater clarity is required as to the weight that will be placed on particular factors. Whilst the main concerns raised related to biodiversity and traffic, the potential for landscape and visual impacts is also a recognised consideration in national policy. The text accompanying Table 16 should refer to environmental and visual factors and the way future restoration will be managed in relation to those areas which have already been restored. Given the sensitivity of Widdington to HGV movements, the table should also make explicit the expectation that an agreement should be provided which would control vehicle movements in that direction (**MM18**).

Table 16, Rivenhall

53. Planning permission was granted in February 2016 for an Integrated Waste Management Facility (IWMF) at Rivenhall (CED11, p1). Since the detailed proposal differed in key respects from the indicative capacity set out in Table 16, the table should be updated to reflect the quantities and types of wastes to be managed under the approved scheme and to maintain consistency with the evidence base. The table should also clarify the term 'other waste', so as to be consistent with Policy 3 (**MM19**).
54. Although there was strong opposition to this allocation, the grant of planning permission has established the principle of this form of development on this site. It is also a firm indication that the waste management capacity is likely to be delivered during the lifetime of the RWLP. I understand that further work will be required as a result of the Environmental Permitting process, including a revision to the design in relation to the height of the stack. The fact that an Environmental Permit is being pursued supports the case that the facility should be regarded as deliverable. Although other concerns were raised, including the detailed arrangements between this facility and the Tovi Eco Park or the extent to which it might actually function as a combined heat and power facility, these do not alter the appropriateness of the site for the allocated waste management uses.

Table 17, Sandon

55. The Councils advise that the indicative figure of 40,000tpa for the inert waste recycling facility was incorrect. A planning application has been made which identifies capacity for 150,000tpa recycling and 150,000tpa landfill and these are the figures which have been used in the evidence base, most notably CED-2, which contains the most up to date assessment of capacity and requirement. The published schedule of main modifications refers to an indicative scale of 300,000tpa inert waste recycling capacity, which the Councils advise is also incorrect. Consequently, I have recommended that the table sets out the capacity as given in the planning application, in order to

be consistent with the evidence base and the intended scale of operations at the site (**MM20**).

Table 19, Sunnymead, Elmstead and Heath Farms; Table 20 Wivenhoe

56. These sites are adjacent to each other and within the same ownership. The RWLP allocates the Sunnymead site for inert landfill, noting that it would act as an extension to Wivenhoe, which is where the inert waste recycling facility is located at present.
57. During the hearings it became clear that restoration at **Wivenhoe** is well-advanced and the recycling facilities there, which date back some 60 years, are not likely to be renewed. That allocation can no longer be regarded as deliverable and so should be removed from the RWLP (**MM22**).
58. The operator seeks instead to locate new recycling facilities within the **Sunnymead, Elmstead and Heath Farms** site. An area of some 7ha on the north-western part of the allocated site has been identified. This would bring recycling activities closer to a greater number of residential properties and the site assessment (MC-2) notes the risk of cumulative effects. Even so, given the site area proposed I consider that there would be sufficient scope within it to incorporate a suitable range of measures to address the potential impact on local amenity. Over the lifetime of the Plan, the proposed location for the inert waste recycling facility would be preferable therefore and Table 19 and the accompanying Map 19 should be modified accordingly.
59. The issues and opportunities should be revised to recognise that the question of whether archaeological remains would be retained in situ would have been resolved as part of the mineral extraction scheme. However, in place of the term 'Palaeolithic', as used by the Councils, Historic England point out that it would be more appropriate to refer to 'archaeological'. I have used 'archaeological', which would also be consistent with the Minerals Local Plan, which refers to the potential for multi-period archaeological deposits.
60. To differentiate between the potential impacts of the two uses, there should also be references to measures specific to each site in relation to residential and visual amenity. Although the Councils suggest that bunding will be needed to the north, east and south, the operator also points to the need for screening to the west. I have revised the wording of this part of the modification accordingly. Since the requirement to consider the impact on European sites through HRA is already contained in the section which applies to both sites, it is not necessary for it to be repeated in that section which relates specifically to site 2. Given the focus on the Sunnymead site, it stands to reason that there may well be a need to reconsider the access arrangements, which the RWLP expects to be by way of the existing access to the Wivenhoe site. However, given the advanced stage of this Plan, that matter should be addressed through the development management process (**MM21**).

New Table and Map, Dollymans Farm

61. The Site Assessment indicates that this site is capable of accepting some 500,000 tonnes of waste.

62. The development principles should address access issues, not only in terms of the efficient and safe use of the highway but also as regards potential impacts on nearby residential areas and on users of the PROW network. Since the case for the allocation stems from the opportunity to improve damaged or derelict land as well as to enhance local landscape quality and visual amenity (NPPF para 81), the details of the final restoration and aftercare will require careful consideration, as will the need for screening. The use of measures to minimise the effects of dust and noise will be necessary to protect nearby sensitive uses and users of the PROW network. There are known heritage assets within or near the site and any proposal should address the potential impact on their significance, along with details of any proposals concerning protection of the WWII memorials (**MM23**).

## Assessment of Legal Compliance

63. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The Local Plan is identified within the Essex County Council Minerals and Waste Development Scheme May 2016 (SD-1) which sets out an expected adoption date of December 2016. It is also identified in the Southend-on-Sea Borough Council Local Development Scheme 2015 (SD-2) which sets out an adoption/submission date of June 2016. The Local Plan's content and timing are broadly compliant with the LDSs.
Statement of Community Involvement (SCI) and relevant regulations	Consultation has been compliant with the requirements of the ECC Statement of Community Involvement 2015 (SD 3) and the SBC Statement of Community Involvement 2013. This includes the consultation on the post-submission proposed 'main modification' changes.
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Appropriate Assessment (AA)	The Habitats Regulations AA Screening Report January 2016 (SD 13) sets out why AA is not necessary. Natural England advises that the HRA has adequately identified and addressed all of the relevant European sites and potential impact pathways.
National Policy	The RWLP complies with national policy except where indicated and modifications are recommended.
2004 Act (as amended) and 2012 Regulations.	The RWLP complies with the Act and the Regulations.

## **Overall Conclusion and Recommendation**

64. The Plan has a number of deficiencies in relation to soundness and/or legal compliance for the reasons set out above which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.
65. The Council has requested that I recommend main modifications to make the Plan sound and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix the Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

*K.A. Ellison*

Inspector

This report is accompanied by the Appendices containing the Main Modifications

## **APPENDIX 1**

Ref	Page/para	Proposed main modification
MM1	Paragraphs 4.21 to 4.23	<p>Re-write '<b>The Waste Challenge at a Glance</b>' as follows:</p> <p><b>4.21 Non Hazardous Waste</b></p> <p>4.21 Non Hazardous Waste</p> <p>There has been and will continue to be cross - boundary movements of waste. Planning Practice Guidance states that imports of waste from Greater London require specific consideration. The Vision &amp; Strategic Objectives of this Plan therefore recognises the need to continue to make provision for imports from London, albeit at a reducing rate. After 2026, imports of non-hazardous waste to landfill should only be of non-recyclable and non-biodegradable wastes, while some provision may also be made for the management of residues suitable for energy recovery at consented plant.</p> <p>Non-organic, non-hazardous waste arisings within the Plan area are expected to moderately increase during the Plan period. In 2015, it was estimated there were 1.57mt of this type of waste arising in the Plan area. By 2031/32, arisings are estimated to be 1.67mtpa. Imports of non-hazardous waste from London have been estimated to be in the region of 375,000 tpa in the early years of the Plan reducing down to around 150,000 tpa at the end of the Plan period.</p> <p>Organic non-hazardous waste arisings within the Plan area are also expected to increase slightly during the Plan period. In 2015, it was estimated that there was 331,000t of organic non-hazardous waste arising in the Plan area. By 2031/32, arisings are estimated to be 349,000tpa.</p> <p>Consented operational capacity is expected to decline from 221,000tpa to 131,000tpa should no further planning permissions be granted over the Plan period. Consequently there will be a requirement for 218,000tpa of new organic treatment capacity by 2031/32.</p> <p>At present, the Waste Disposal Authority is considering long term management options for the stabilised residual waste output of the Tovi Eco Park Facility. In 2016, the annual 200,000t output of the from this facility was exported from the Plan area. In line with the Plan's Strategy for the Plan area to become net self-sufficient with regard to its waste management needs where practicable, the Plan includes a site allocation which has capacity to potentially manage this residual waste in the</p>

		<p>Plan area in the longer term.</p> <p>Assuming that suitable facilities are delivered on the sites allocated in this Plan, it is forecast that some non-hazardous landfill void space will exist at the end of the Plan period. However, in accordance with the waste hierarchy, this remains the option of last resort and is not considered to be a substitute for developing further treatment capacity that will move waste up the hierarchy.</p> <p><b>4.22 Construction, Demolition and Excavation Waste</b></p> <p>It is estimated that local Construction, Demolition and Excavation waste arisings was 3.62mtpa in 2014 (including 0.31mt of waste imported from London).</p> <p>It is identified that there is a need for an additional 1.95mtpa of Construction, Demolition and Excavation management (recycling or disposal) capacity by 2031/32, partly due to the expiry of existing temporary planning permissions.</p> <p>Locally collected evidence suggests that there is further diversion from landfill through beneficial re-use of inert waste, which equated to approximately 765,000tpa in 2014.</p> <p>It is estimated that there is a current inert landfill void space of approximately 3.25 million cubic m, which would equate to approximately 5.1 million tonnes of capacity. This is, however, not sufficient to accommodate the forecast need for inert waste management capacity over the Plan period, to accommodate both the needs of the Plan area and the inert waste projected to be imported from London. To address this, sites capable of providing 490,000 tpa of inert waste recycling capacity and inert waste landfill sites capable of accommodating 14.08million tonnes in total is allocated in the Plan. It is, however, recognised that a proportion of the total inert waste recycling capacity is temporary in nature, and without further permissions, the total inert recycling capacity is likely to reduce to 340,000tpa at the end of the Plan period.</p> <p>Nonetheless, even after the allocation of all sites suitable for inert waste recycling and inert waste landfill, there is a further need to find management solutions for a total of 7.05mt of inert waste. Since no other submitted sites have been deemed suitable for the management of inert waste in the Plan area, locational criteria policies would be used to assess any additional future inert waste management proposals.</p> <p><b>4.23 Hazardous Waste</b></p> <p>In 2014, most of the 113,000tpa of hazardous waste requiring management was exported from the Plan area</p>
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		<p>for final management. Of this around 23,000 tpa was disposed to landfill.</p> <p>The only landfill accepting hazardous waste (Stable Non-Reactive Hazardous Waste -SNRHW) within the Plan area closed in April 2014, so, in 2016, waste was being disposed of at sites beyond the Plan area. This facility, on average, accepted approximately 50,000 tonnes of SNRHW per annum, which included imports from other authority areas as well as waste generated within the Plan area.</p> <p>Hazardous waste is not subject to net self-sufficiency within this Plan due to the specialist nature of the facility type and the relatively small quantities generated within the Plan area.</p> <p>A new site for a Stable Non-Reactive Hazardous Waste Landfill with a total capacity for 30,000 tonnes is allocated in the Plan. No other proposals for the management of hazardous waste in the Plan area were submitted. Locational criteria policies would be used to assess any future hazardous waste proposals should the market identify a need for further facilities in the Plan area.</p>
MM2	Paragraph 5.3	<p>Re-write as follows:</p> <p>The principle of net self-sufficiency does not apply to hazardous waste or radioactive waste as it is not considered practical to provide for such specialist facilities on the basis of net self-sufficiency within the Plan area.</p>
MM3	Policy 1	<p>At (a), replace 217,000 with 218,000</p> <p>At (b) replace 1.5 with 1.95</p> <p>Re-write (c) as follows:</p> <p>c. up to 200,000 tonnes per annum by 2031/32 for the further management of non-hazardous residual waste; and</p>
MM4	Policy 2 and paras 6.7, 6.10, 6.11	<p>At para 6.7:</p> <p>after 'within 250m of a safeguarded site' add: (or 400m of a Water Recycling Centre - WRC);</p> <p>after 'Sensitive uses should not be located adjacent to, or within, 250 metres' add: (or 400m of a WRC)</p> <p>Re-write paras 6.10 and 6.11 as follows:</p> <p>6.10 In some cases, the potential adverse impact on a waste site or operation of a waste facility may not be contested by the WPAs. Such instances could include scenarios where it can be ascertained that there are wider social, environmental and/or economic benefits resulting</p>



		<p>from new development that may outweigh the retention of the waste use. In such instances, alternative site provision for the displaced waste use could be required should such capacity continue to be necessary.</p> <p>6.11 Whilst Waste Consultation Zones apply to all permitted waste facilities in the Plan area, the WPAs are unlikely to object to development in close proximity to a small scale, non-specialist facility, defined in this Plan as those with an annual capacity of 10,000tpa or less.</p> <p>Policy 2: Re-write the first two paragraphs as follows: Where non-waste development is proposed within 250m of safeguarded sites, or within 400m of a WRC, the relevant Local Planning Authority is required to consult the Waste Planning Authority on the proposed non-waste development (except for those developments defined as 'Excluded' in 'Appendix C - Development Excluded from Safeguarding Provisions'). Proposals which are considered to have the potential to adversely impact on the operation of a safeguarded waste site or infrastructure, including the site allocations within this Plan, are unlikely to be opposed where: In clause 'a', after 'or infrastructure is' insert 'considered' Re-write clause 'b' as follows: redevelopment of the waste site or loss of the waste infrastructure would form part of a strategy or scheme that has wider environmental, social and/or economic benefits that outweigh the retention of the site or the infrastructure for the waste use, and alternative provision is made for the displaced waste use; or Delete final para beginning: 'Where proposed <i>non-waste development</i> ...</p>
MM5	Policy 3, Clauses 1, 2, 3, 4	<p>Amend clauses 1-4 as follows: Clause 1 Basildon Water Recycling Centre, Basildon Clause 2 After Blackley Quarry insert: Sunnymead, Elmstead &amp; Heath Farms, Tendring (W36) Delete: Wivenhoe Quarry Plant Area, Tendring Clause 3 Delete 'other' insert 'residual non-hazardous'</p>

		<p>Clause 4</p> <p>Add:</p> <p>Dollymans Farm, Basildon/Rochford (L(i)16)</p>
MM6	paragraph 8.10	<p>Re-write as follows:</p> <p>Proposals within the Areas of Search will normally require express planning permission and will be considered against other relevant policies in the RWLP, including Policy 10 – Development Management, and the wider Development Plan as a whole. The need to consider the wider Development Plan is important as it is the relevant Local Plan which determines whether an Area of Search designation remains relevant. Should a Local Plan seek to re-allocate land pertaining to an Area of Search away from B2/B8 uses, the criteria upon which Areas of Search are based would no longer be fulfilled. In such instances, the location would cease to be an Area of Search and Policy 4 would no longer apply. The design and operation of waste management facilities proposed within Areas of Search should be compatible with existing uses in the employment area.</p>
MM7	Policy 4	<p>Re-write opening paragraphs to policy 4 as follows:</p> <p>Proposals for waste management development in the following Areas of Search, as defined on the Policies Map, will be supported in principle provided that the design and use of the facility is compatible with existing uses in the employment area.</p> <p>Proposals will be considered against other relevant policies of this Plan and the wider Development Plan.</p> <p>Delete the following site from the list of areas of search:</p> <p>'Oakwood and Crusader Business Park '</p>
MM8	Policy 5	<p>Amend title to read:</p> <p>'Enclosed waste facilities on unallocated sites or outside areas of search'</p> <p>Revise Clause 1 to read:</p> <p>the waste site allocations and the Areas of Search in this Plan are shown to be unsuitable or unavailable for the proposed development</p> <p>At the beginning of Clause 2 add:</p> <p>'although not exclusively,'</p> <p>delete final sentence, and re-write as follows:</p> <p>'Any proposals that come forward on land use types not identified above will be assessed on their merits, based on</p>

		the policies in this Plan'
MM9	Policy 6	<p>Amend title to read:          'Open waste facilities on unallocated sites or outside areas of search'</p> <p>Revise Clause 1 to read:          the waste site allocations and the Areas of Search in this Plan are shown to be unsuitable or unavailable for the proposed development</p> <p>At the beginning of Clause 2 add:          'although not exclusively,'</p> <p>delete final sentence, and re-write as follows:          'Any proposals that come forward on land use types not identified above will be assessed on their merits, based on the policies in this Plan'</p>
MM10	Policy 7	<p>Amend title to read:          Radioactive Waste Management at Bradwell-on-Sea</p> <p>Amend first sentence to read:          Proposals for facilities for the management of nuclear radioactive Intermediate Level Waste (ILW), Low Level Waste (LLW) or Very Low Level Waste (VLLW) will be supported within the Nuclear Licensed Areas at Bradwell-on-Sea, where:</p> <p>Amend Clause b to read:          b. the proposals are informed by the outcome of economic and environmental assessments that support and justify the management of radioactive waste at this location, and;</p>
MM11	Policy 9	<p>Revise Clause 1 to read:          the landfill site allocations in this Plan are shown to be unsuitable or unavailable for the proposed development</p> <p>At the beginning of Clause 2 add:          'although not exclusively,'</p> <p>delete final sentence, and re-write as follows:          'Any proposals that coming forward on land use types not identified above will be assessed on their merits, based on the policies in this Plan'</p>
MM12	paragraph 9.33	<p>Rewrite para to read:          The Public Rights of Way (PROW) network provides an important means of accessing the countryside. Where relevant, applications for waste management will be required to ensure that PROW remain usable at all times or provide satisfactory alternative routes. Alternative</p>

		paths and any necessary diversions of existing paths will be required to be in place prior to the closure of the existing PROW. Restoration schemes should, in the first instance, be seen as an opportunity to enhance and upgrade PROW where possible, especially with regard to the provision of Bridleways as multi-user paths as part of any permission granted. In all cases, restoration schemes should provide for access which is at least as good as that existing before workings began. The closure of a PROW, where no alternative route is provided, will not normally be acceptable.
MM13	Policy 10	<p>Revise criterion b to read:</p> <p>b. water resources, with particular regard to:</p> <ul style="list-style-type: none"> <li>- the quantity of water within water bodies: <ul style="list-style-type: none"> <li>• preventing the deterioration of their existing status; or</li> <li>• failure to achieve the objective of 'good status', and</li> </ul> </li> <li>- the quantity of water for resource purposes within water bodies'</li> </ul> <p>Add final sentence:</p> <p>Where appropriate, enhancement of the environment would be sought, including, but not exclusively, the enhancement of the Public Rights of Way network, creation of recreation opportunities and enhancement of the natural, historic and built environment and surrounding landscape.</p>
MM14	policy 12	<p>Add criterion d:</p> <p>Where access to the main road network in accordance with (b) and (c) above is not feasible, road access via a suitable existing road prior to gaining access onto the main road network will exceptionally be permitted, having regard to the scale of the development, the proximity of sensitive receptors, the capacity of the road and an assessment of the impact on road safety</p>
Modifications to Appendix B, development principles		
MM15	Table 8	<p>For Inert landfill insert:</p> <p>250,000tpa</p> <p>At Estimated Availability insert:</p> <p>Upon adoption (2017)</p>
MM16	Table 11	<p>At Site 1 Area insert: 6.90ha</p> <p>At Estimated Availability insert:</p> <p>Site 3 – 5-10 years</p> <p>At Life insert:</p>

		<p>Site 2 – 15 years</p> <p>Site 3 - 15 years</p> <p>After 'The following specific issues and opportunities are to be addressed for Site 2'</p> <p>delete first bullet point beginning 'Waste shall be restricted to ... '</p> <p>rewrite third bullet point as follows:</p> <p>To demonstrate that there would not be an adverse effect on a European site through HRA. Any development would need to ensure that there would not be an adverse impact on water quality.</p>
MM17	Table 14	<p>amend bullet point 4 and add new 5 as follows:</p> <p>It is expected that operations would be enclosed within an appropriate building. Dust mitigation measures, limits on duration (hours of operation) and noise standards (from noise sensitive properties) will be established in the interests of protecting local amenity.</p> <p>The configuration and operation of the proposed facility shall have regard to impacts on neighbouring land uses, including the potential impacts on the adjacent retail use.</p>
MM18	Table 15	<p>in the first bullet point before 'calcareous grassland' insert 'lowland'</p> <p>rewrite the second bullet point to read:</p> <p>Careful consideration of the environmental and visual impacts of the waste development will be necessary as part of a planning application, particularly if a proposal relates to already restored areas. Specifically, ecological enhancement of the site would be sought, with the final restoration and long-term aftercare expected to result in the creation of lowland calcareous grassland priority habitat. It will be necessary to consider phased working to avoid the loss of existing species.</p> <p>rewrite bullet point 6 to read:</p> <p>A vehicle routing agreement is required to ensure the site would be accessed via the existing access to Newport Quarry and via the Main Road Network (B1383). The number of heavy vehicle movements to and from the east shall be limited to those serving Widdington only.</p>
MM19	Table 16	<p>At Indicative Facility Scale, for AD insert 30,000tpa; for CHP insert 595,000tpa</p>
MM20	Table 17	<p>At Indicative Facility Scale, for Inert Waste Recycling insert 150,000tpa</p>
MM21	Table 19	<p>At Area Insert:</p>

		<p>Site 1: 63.74ha</p> <p>Site 2: 7ha</p> <p>At Indicative Facility Scale insert:</p> <p>Site 1: 1,800,000m<sup>3</sup></p> <p>Site 2: 40,000tpa</p> <p>At Site Allocation For Insert:</p> <p>Site 1: Inert Landfill Capacity</p> <p>Site 2: Inert Waste Recycling</p> <p>At Life Insert:</p> <p>17 years</p> <p>Rewrite bullet point 5 as:</p> <p>An archaeological desk based assessment would be required to investigate the gravels to establish their potential for archaeological remains and trial trench evaluation will be required, along with a mitigation strategy, to form part of the Environmental Statement.</p> <p>Rewrite bullet point 7 as:</p> <p>PRoW footpath Elmstead 24 crosses site 1 and is adjacent to site 2, and requires sufficient stand-off distance and protection during operations (e.g., satisfactory crossing point(s) provided for quarry vehicles)</p> <p>Add the following text:</p> <p>The following specific issues and opportunities are to be addressed for Site 1:</p> <p>A minimum of 100m standoff should be provided for all residential properties and effective screening provided to screen views of the site.</p> <p>Retain bullet points concerning Cockaynes Wood Local Wildlife Site and Footpaths Elmstead 19 and Alresford 2.</p> <p>Add:</p> <p>The following specific issues and opportunities are to be addressed for Site 2:</p> <p>Bunding will be required around those parts of the site which are not adequately screened by natural vegetation.</p>
MM22	Table 20 and Map 20	delete
MM23	New Table and Map	insert text as set out at Appendix 2
Appendix C		
MM24	Appendix C	At: Applications for change of use

	Table 21	<p>Delete: 'for change of use'</p> <p>Insert:</p> <p>From B2/B8 to any other use</p> <p>To Class A and C, from any other use</p> <p>Insert:</p> <p>Other applications for change of use. Excluded</p> <p>Delete:</p> <p>Applications for temporary buildings, structures or uses (for up to five years). Included</p>
MM25	At para C2	<p>Add:</p> <p>The development types below include those relating to temporary structures and uses</p>
Appendix E Areas of Search		
MM26	Map 51	delete

## **APPENDIX 2**

New Table: Dollymans Farm

District	Basildon/Rochford
Area	16.09ha
Indicative Facility Scale	500,000 tonnes
Link to Waste and Mineral Activities	The site constitutes a former mineral borrow pit.
Site Allocation For	Inert Landfill Capacity
Access	Via private road adjoining A129
Estimated Availability	2017
Life	Up to 5 years

This site would culminate in the restoration of a former mineral void. The following specific issues and opportunities are to be addressed:

All access should be via the A129. A Transport Assessment would be required at the planning application stage to review access arrangements and examine safety and capacity of the local road network. This may result in the diversion of bridleway to segregate users from vehicles or other mitigation works.

The proposal should demonstrate that there would not be an adverse effect on a European site through HRA. Such an assessment should include consideration of functionally linked land, and must demonstrate no adverse effects on the integrity of any international site. Evidence will change over time regarding the preferences of species such as the Dark-bellied Brent Geese, so appropriate foraging distances should be reviewed as part of any HRA.

Chichester Hall Brook requires protection, for example through an appropriate buffer of at least 15m and through the assessment of potential hydrological impacts with appropriate protection.

Restoration of the site through this allocation provides the significant opportunity for biodiversity, landscape, visual enhancement and historic asset preservation. Careful consideration of the environmental impacts of the waste development will be necessary as part of a planning application with proportionate levels of mitigation to be established. Specifically, the WPA would seek the overall landscape improvement of the site, with the final restoration and long-term aftercare to be beneficial to the Green Belt and biodiversity with particular reference to habitat creation in line with the Northern Thames Basin National Character Area.

Retain trees and shrubs to screen plant and materials from the road. Consider new planting and bunding to screen views into the site prior to commencement of landfilling operations.

Dust mitigation measures, limits on duration (hours of operation) and noise standards (from noise sensitive properties) will be established in the interests of protecting local amenity.



An Archaeological Desk Based Assessment should be carried out to identify the extent of preservation within the northern part of the site and preservation requirements around war memorials.

Areas of archaeological deposits preserved in situ will require excavation if working is likely to cause ground disturbance in the north western part of the site

A management proposal for the survival and maintenance of the memorial for the burial sites should be submitted with any application.

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## Foreword

## Foreword

This Waste Local Plan has been prepared to help ensure we can deal with all types of waste arising in Essex and Southend, now and in the future, in a way which is least damaging to the environment and helps maintain the best possible quality of life for our residents. The Plan forms part of the statutory development plan and provides the policies for planning decisions for all forms of waste management development in the administrative areas of both authorities.

All households, businesses and industries in Essex and Southend-on-Sea produce waste. Much is already being done to reduce, re-use or recycle that waste wherever possible or to find some other beneficial use for the materials we throw away. The continuing challenge we have is to introduce better, more sustainable, ways of dealing with waste whilst continuing to reduce the historical dependence we have had on landfill.

Throughout its preparation this Plan has been shaped by comments from a large variety of interests – be it residents, businesses, public bodies and organisations. We are extremely grateful for all your contributions and your feedback has been used to inform this final version of the Plan. In particular we have placed great emphasis on local communities taking part in policy making and significant efforts have been made to ensure all those likely to be affected by the Plan have the opportunity to be involved in its preparation.

The Waste Local Plan will help ensure that future waste needs of Essex and Southend-on-Sea can be appropriately met through sites situated in the most appropriate locations and with minimal impact on communities and the environment. The waste planning policies found in this document provide up-to-date planning policy for waste development in Essex and Southend-on-Sea until 2032. We will annually monitor the effectiveness of these policies to ensure that they are implemented successfully and publish the results.

The Plan provides an approach that provides some certainty over the location of future waste management development. We believe the vision, strategies, policies and sites outlined in the Plan put us in a good position to be able to manage all the waste we produce, now and in the future, in the most sustainable way possible.



Sue Lissimore, Cabinet Member for Housing, Property and Planning, Essex County Council



Mark Flewitt, Executive Councillor for Housing, Planning and Sustainability, Southend-on-Sea Borough Council

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# 1 Introduction

**1.1** Sustainable waste management is a key challenge facing Essex and Southend-on-Sea now and in the future. There is a need to move away from traditional forms of waste management towards greater levels of re-use, recycling and recovery.

**1.2** The planning system has an important role to play in achieving this goal. Planning helps to ensure the new facilities required are sited in the most suitable locations and are well designed and carefully managed. Furthermore, the Planning Authorities have to take into account the need to minimise the amount of waste produced and existing targets for recycling, recovery and the amount of residual waste being landfilled.

**1.3** Essex County Council (ECC) and Southend-on-Sea Borough Council (SBC) are Waste Planning Authorities (WPAs) and as such are required to prepare a Waste Local Plan to replace the existing joint Plan that was adopted in 2001. ECC and SBC have worked jointly to produce a Waste Local Plan (WLP) to cover both administrative areas (hereafter referred to as the “Plan area”). Producing a Waste Local Plan is required under the Planning and Compulsory Purchase Act (2004) and the EU Waste Framework Directive.

## What is ‘Waste’?

**1.4** The legal definition of waste in the UK is derived from the EU Waste Framework Directive (Directive 2008/98/EC). The Directive states that ‘waste’ is:- “Any substance or object which the holder discards or intends or is required to discard”.

**1.5** In basic terms ‘waste’ is anything that you decide to, or are required to, throw away. Even if the substance is given to someone else to be reused or recycled, it is still legally considered waste if it is no longer required by the person who produced it. Materials that are technically ‘waste’ are, however, increasingly being seen as a potential resource for use in manufacturing or other processes. Such an approach helps to reduce the amount of waste requiring disposal.

**1.6** The WLP provides the framework for determining planning applications for new waste facilities and changes to existing waste facilities.

**1.7** The Plan provides the key principles and policies to guide the future management of waste in the Plan area up until 2032. Primarily, this includes the spatial vision, strategic objectives, spatial strategy, core policies, development management policies and a monitoring framework. A full schedule of all of the policies included in this Plan are set out in [H 'Appendix H - Policy Schedule'](#).

**1.8** Within the Plan area there are a number of organisations involved in planning for waste, the management of waste, and the regulation of waste. The different roles of the organisations and their responsibilities are outlined in [G 'Appendix G - Roles and Responsibilities'](#).

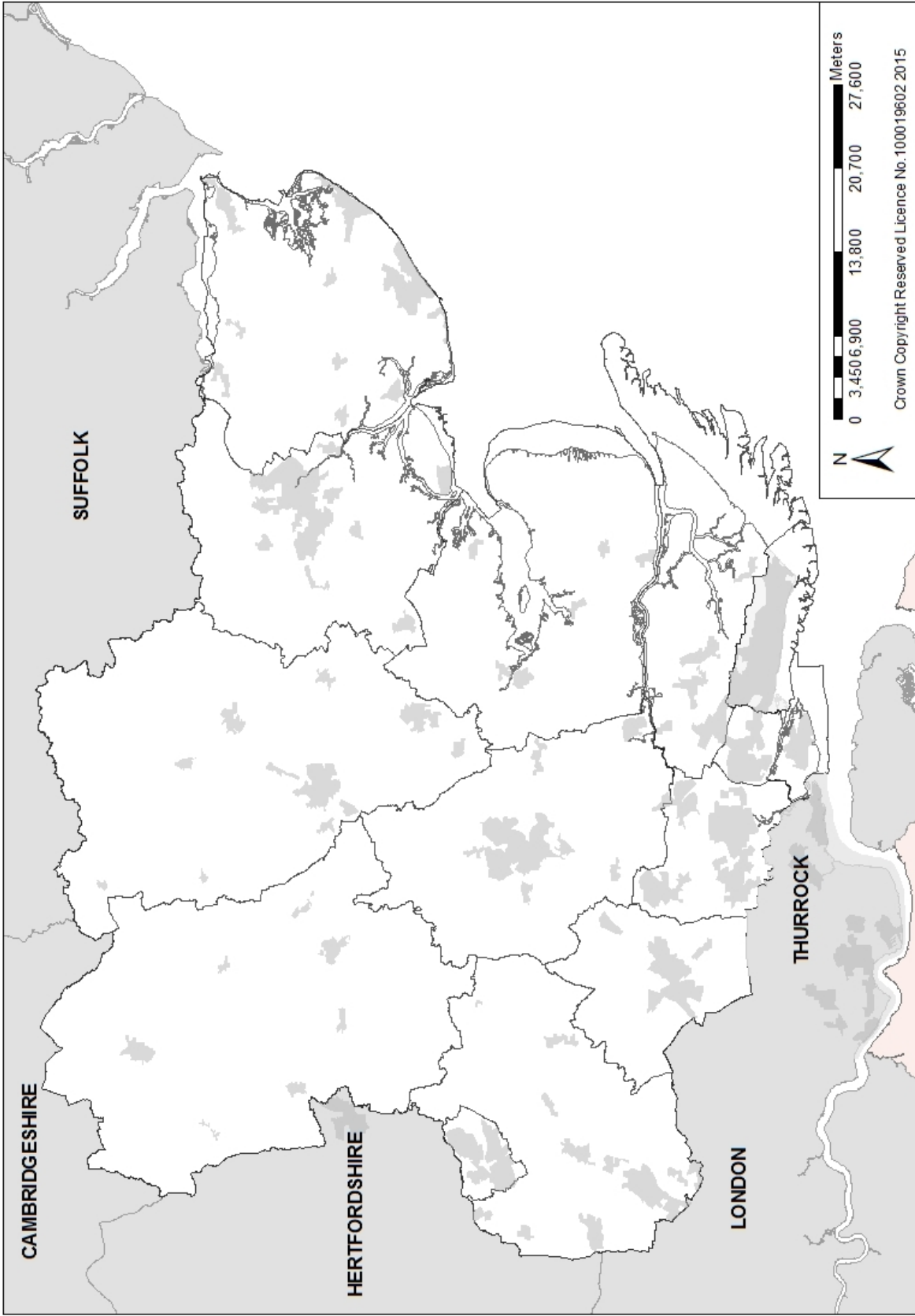
## 2 Spatial Context

**2.1** The purpose of this chapter is to set out the spatial and policy context for the Waste Local Plan by providing a summary of the Plan area characteristics that have an influence on waste arisings, and how and where this waste can be managed.

**2.2** The Plan area comprises the administrative areas of Essex County Council and the unitary authority of Southend-on-Sea Borough Council. Essex is located to the northeast of London, within the East of England region, and borders the counties of Hertfordshire, Suffolk and Cambridgeshire. Within the County of Essex, the two-tier administrative system includes 12 District, Borough and City Councils. Southend-on-Sea is located to the south east of Essex and borders Rochford District to the north and Castle Point to the west, while the southern and eastern boundaries of the Borough are formed by the Thames Estuary.

**2.3** The Plan area therefore includes 13 District, Borough and City Councils and covers an area of 3,737km<sup>2</sup>. The Plan area adjoins the Unitary Authority of Thurrock, the London Boroughs of Enfield, Waltham Forest, Redbridge and Havering, and the Counties of Hertfordshire, Cambridgeshire, Suffolk and Kent.

Map 1 Waste Local Plan Area





A summary of the Plan area is provided in the information box below:

## Portrait of the Plan Area - at a glance

### 2.4 Population

Most people live in the main urban areas, consisting of the large/key settlements and more dispersed smaller settlements. The population of Essex is estimated to be 1.61 million (mid-2014); an increase of 17,600 on the preceding year.

As of mid-2014, Basildon continues to have the largest population within Essex at 180,500 people, followed by Colchester (180,400). The smallest population is in Maldon where it was estimated to be 62,800. Southend-on-Sea's population was estimated to be 177,900 and, due to its tightly constrained administrative boundary, is the most densely populated authority area in Greater Essex.

### 2.5 Households

National Government is committed to significant growth in the southeast area, in part due to its close proximity to London. District, Borough and City Councils continue to take account of national household projections in adopted and emerging local development plan documents. It is expected that housing growth will occur in all districts within Essex and Southend-on-Sea, with a particular focus in Chelmsford, Colchester, Basildon, Harlow and Southend-on-Sea. This growth will include regeneration of previously developed (brown-field) land whilst there is a general presumption against inappropriate development in the London Metropolitan Green Belt, which covers a significant portion of the south of the Plan Area.

**Table 1 : Indicative Housing Growth in Essex to 2032**

Emerging Plans	Average Actual Build (2001/02 to 2014/15)	Projected Annual Requirement		
		Adopted Core Strategy	Emerging Local Plans	Total
8 emerging	61446 <sup>(1)</sup>	525**	6172***	6,697
5 adopted				

Source:

\*\*Adopted Core Strategy Documents (Rochford/Southend)

\*\*\*Adopted/Emerging Objectively Assessed Housing Need Requirements as at December 2015

1 Data excludes net completions for 2014/15 (Rochford/Southend)

## 2.6 Development Trends

In addition to housing growth across the county, there are also several major existing and future infrastructure projects located in the Plan area or in neighbouring areas, which may produce quantities of waste that may result in an increase in waste arisings within the Plan area or within adjacent areas. These projects include:

- the current construction of Crossrail with excavation materials transported to Wallasea Island (Rochford District) to create an RSPB wetland reserve;
- Bathside Bay in Harwich, (Tendring District) has secured planning permission, but is yet to begin construction;
- potentially, there may be development of a new Lower Thames Crossing between Greater Essex and Kent during the WLP Period;
- similarly, Crossrail 2 may be developed during the WLP Period, which could generate significant quantities of waste to be managed in the Plan area;
- Bradwell-on-Sea (Maldon District) has been identified by central Government as a potentially suitable location for the construction of a new nuclear power station. Any decisions regarding nuclear power delivery is considered a Nationally Significant Infrastructure Project (NSIP) and therefore applications are made directly to the Planning Inspectorate and not Essex or Southend-on-Sea Councils<sup>(2)</sup>.

## 2.7 Economy

The economy of Essex and Southend-on-Sea is large and generally prosperous, with high standards of living. Although unemployment remains high at 5.4% in 2013, it is below the national average (7.0%). Wages are higher than the national averages for residence based (£574.9 per week in Essex) earnings and lower for workplace based (£517.2 per week) earnings. Higher value earnings are found in the west of Essex largely due to greater connections into London.

## 2.8 Transport

The strategic road network in the Plan area is heavily influenced by the proximity of London, with key trunk routes such as the M11, A12, A127 and A13 radiating out from the city and into Essex. The M11 runs down the western boundary of the Plan area and the M25 cuts across the south-western corner. Four main railway lines travel through the Plan area from London, with two going north to Cambridge and Ipswich and two going east to Southend-on-Sea.

Despite the potential impacts to the road network as a consequence of waste development, there are limitations with alternative transport modes as the rail network is also under pressure and mainly geared for passengers. Transporting waste by water is another alternative to road transport but opportunities in the Plan area are small due to the need to manage waste close to its source of arisings. Water transport is generally also more appropriate for transporting waste over longer distances, contrary to the principle of treating and managing waste close to its source in order to reduce transport distances.

2 Further information about the NSIP process can be found on the [Planning Portal](#)

## 2.9 Environment

Despite most of the population living in urban areas, three quarters of Essex's land area is rural, consisting of undulating countryside, rolling fields, picturesque and historic villages, internationally significant coastline, ancient woodlands and a number of important rivers that meander through the low-lying topography of the county eastwards towards the coast.

Protection of the environment is a key objective with significant areas of land designated to safeguard landscapes, open spaces, and areas of ecological, historical and geological value.

The Metropolitan Green Belt encircles Greater London and covers most of the districts of Epping, Brentwood, Basildon and Rochford, about a third of Chelmsford City and parts of the administrative areas of Castle Point, Harlow, Uttlesford and Southend-on-Sea. The Green Belt covers approximately 86,000 hectares; approximately 22% of the County.

Essex hosts a variety of important lowland habitats, which are protected nationally and internationally. In particular, the Essex coast is recognised as a significant area, with great importance also attached to the wood-pasture of Epping Forest and the wetlands of Abberton Reservoir and the Lee Valley.

In total there are 85 Sites of Special Scientific Interest (SSSI) covering 36,322 hectares of the Plan area, 17 European sites (Special Protection Areas and Special Areas for Conservation) designated for wildlife covering 78,271 hectares and fourteen other international sites (Ramsars) covering 30,524 hectares. There is also a single Area of Outstanding National Beauty located at Dedham Vale on the Essex and Suffolk border. These protected areas are supported by a network of sites of county value for nature conservation which are known as Local Wildlife Sites (LoWS).

## 2.10 Historic Environment

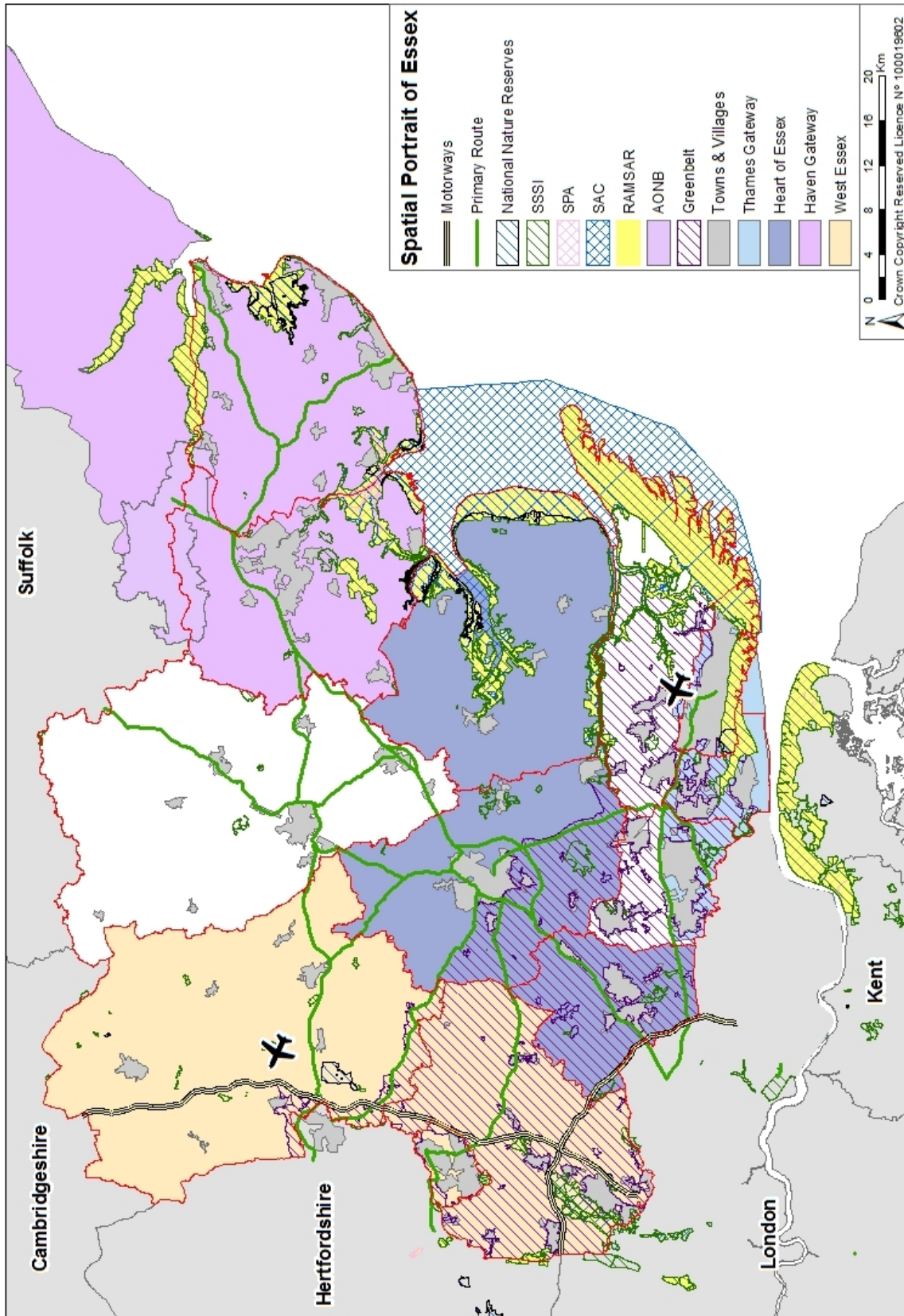
Essex has an exceptionally rich historic environment, contributing significantly to the character of the County. There are just under 55,000 records on the Essex Historic Environment Record, comprising 40,312 known archaeological sites, 14,075 listed buildings, 304 scheduled monuments and 38 historic parks and gardens. These have a date range from the early Palaeolithic, with the first humans arriving in Essex, through to modern military installations of both World Wars and the following Cold War. Essex's identity and sense of place is closely linked with its rich heritage.

## 2.11 Climate Issues

Essex and Southend-on-Sea lie within a particularly dry part of the country, with an average rainfall that is 35% less than that of England and Wales as a whole. However, the low-lying coastline is susceptible to flooding and the many coastal estuaries spread this risk inland. The risk of flooding is likely to increase with climate change because of rising sea levels, climatic instability and more frequent extreme weather events.

The key spatial constraints as noted in the box above are illustrated in the map below:

Map 2 Spatial Portrait of the Plan Area. Source: ECC (2015)



### 3 Policy Context

**3.1** The range of key strategies and policies that are relevant to the WLP are summarised in A 'Appendix A - Policy Context'. A significant element of the policy context for the Plan is the Waste Hierarchy. The intention is that, in making decisions about waste management, greater weight should be attributed to those waste management methods that are towards the top of the Hierarchy. Essex and Southend-on-Sea have previously followed the principles of the Waste Hierarchy through the Waste Local Plan (2001).

**3.2** The principles of the Hierarchy have been used to inform the requirements for new waste management capacity. Through the policies in the WLP, the WPAs actively support the movement of waste management up the Waste Hierarchy. The other element of National Planning Guidance considered to be key for the WLP is the principle of self-sufficiency in waste capacity. This is the concept of providing enough waste capacity to handle the forecasted amount of waste arising in the Plan area. The Guidance indicates that waste planning authorities are not expected to deal solely with their own waste to meet the requirements of self-sufficiency. This is because planning for waste must also demonstrate an adherence to the 'proximity principle' which is the principle of treating waste close to the source

of where it is created. Waste generated close to an administrative border may be treated across that border and therefore cross border movements of waste are acceptable and are taken account under the term 'net self-sufficiency'. Further, this Plan is based on net self-sufficiency where this is practicable. Certain waste types, such as low-level radioactive wastes, are generated in such small quantities that it is not practicable to manage this waste on a local basis as insufficient waste is produced to justify the development of specialist facilities. On-going discussions with other Waste Planning Authorities as part of the Duty to Co-operate, establish existing spare capacities both inside and outside the Plan area to manage such waste.

**3.3** With regard to the scope of this Plan, policy considerations for guiding non-waste development are set out in national and other local planning policy documents and are not a feature of this Plan. As such, Essex County Council and Southend-on-Sea Borough Council will continue to work with district and borough Councils, particularly through the Duty to Co-operate process, to support the preparation and implementation of their Local Plans in respect of ensuring adequate waste collection facilities are provided and as far as possible waste is managed at source.

**Picture 1 Waste Hierarchy**



## 4 Waste Management Context

### Existing Waste Management Capacity

**4.1** Waste is created from a range of different sources called waste streams, which often include similar types of waste materials. As the WPAs, Essex County Council and Southend-on-Sea Borough Council have responsibility to address, through the planning system, the waste management of all controlled waste streams produced within the Plan area.

### Waste Prevention

**4.2** Waste prevention is at the top of the Waste Hierarchy. These principles are fundamental to the WLP as they seek to address our unsustainable consumption of resources. The benefits of waste prevention are three-fold as they result in:

- a reduction in the use of material resources, water and energy that go into the production of what becomes waste in the first instance (be this plastic packaging or food waste);
- a reduction in the resources that are required for management and/or disposal of waste (for waste management infrastructure, water and energy);
- a reduction in what is emitted from these processes (e.g. wastewater and greenhouse gases).

**4.3** While the WLP can only go so far towards achieving waste prevention and re-use in new development, it can support the many existing waste reduction, education and awareness initiatives. Many of these initiatives form an integral element of the work of the Essex Waste Partnership, who have a number of partnership waste reduction schemes in place (such as home composting, real nappy campaigns, and scrap and swap-it schemes), described in detail in the [Joint Municipal Waste Management Strategy for Essex 2007-2032](#) and the [Southend Municipal Waste Management Strategy 2004-2020](#).

**4.4** These initiatives are not only good for the environment, they are also financially beneficial. For every tonne of waste that is managed and disposed of there is a financial cost, borne by the government, businesses and individuals.

**4.5** The benefits of waste prevention were recognised by the European Commission who launched 'Europe 2020' with a goal to encourage 'smart, sustainable, inclusive' growth. A need to 'decouple' economic growth from resource use, and the amount of waste being generated, was also identified. Nationally the need for decoupling waste generated from economic growth (in all sectors) was seen as a key objective of the [National Waste Management Plan for England \(2013\)](#), and the decoupling of growth from waste generation and waste prevention has been investigated in more detail in the [Waste prevention programme for England \(2013\)](#). The aim of the programme is to improve the environment and protect human health by supporting a resource efficient economy, reducing the quantity and impact of waste produced whilst promoting sustainable economic growth. To do this, the document references the requirement to move towards a more resource efficient, circular economy. This contains a number of priority areas <sup>(3)</sup> that need to be addressed to assist in reducing the amount of waste produced.

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3 Consisting of plastic, food, textile, electrical, paper and board, furniture and bulky waste, construction and demolition, healthcare and chemical wastes

**4.6** To deliver waste prevention, there are a number of actions that can be taken, including more efficient manufacturing and ordering processes by businesses, encouraging behavioural change to reduce overall consumption and improving home composting, sorting and recycling of waste by public sector bodies. Additional measures could include the requirement for new developments to put in place practicable measures to achieve greater waste minimisation through a waste management audit and strategy. Some of these actions can be encouraged through the WLP, but others need to be addressed through other parts of the Local Development Framework including Essex District, Borough and City Councils and Southend-on-Sea Borough Council's Local Plan policies.

### **Main Waste Streams in the Plan area**

**4.7** Waste is classified into different types depending on the nature and source of the material. The box below sets out the different waste streams that arise within the Plan area:

#### **Main Waste Streams in the Plan area**

##### **4.8 Non-Hazardous Waste**

Non-Hazardous waste is split into two types of waste: 'organic' which includes compostable material such as food and green wastes and 'non organic' which includes recyclables such as glass and plastic. There are two sources of non-hazardous waste, as shown below:

- Local Authority Collected Waste (LACW) - Waste from households and some commercial properties that is collected by the local authority, including waste from public gardens and public bins. This is closely monitored by the Waste Disposal Authority and therefore available data is relatively comprehensive.
- Commercial and Industrial Waste - Waste from shops, industrial and business premises; this covers a wide range of waste types from food waste to packaging.

##### **4.9 Construction, Demolition and Excavation waste (CD&E)**

Waste that is typically inert, meaning it is biologically stable and does not undergo any significant physical, chemical or biological transformations. Where soils are present, these may not be inert and may require further treatment. CD&E waste can be in the form of certain types of:

- Construction wastes (e.g. surplus supplies of bricks specifically required for a single project);
- Demolition wastes (e.g. used material resulting from demolition activities); or
- Excavation wastes (e.g. usually consisting of soils and stones which cannot be used beneficially, such as from tunnelling projects or 'overburden' from removing soils from an area in preparation for mineral excavation. The soil component may not be inert).

##### **4.10 Hazardous waste**

Waste that poses potential threats to public health or the environment (when improperly treated, stored, transported or disposed). This can be due to the quantity, concentration, or characteristics of the waste. This type of waste includes elements of healthcare waste.

#### 4.11 Radioactive waste

Radioactive wastes are categorised into nuclear and non-nuclear wastes. Nuclear wastes are from the nuclear power industry while “non-nuclear” wastes are generally from medical facilities and educational establishments.

#### 4.12 Wastewater (sewage)

Comprises liquid and solid waste discharged by domestic residences, commercial properties, industry, and agricultural activities, which is then carried to Water Recycling Centres via a network of foul sewers.

#### 4.13 Agricultural waste

Waste that is specifically generated by agricultural activities which can include organic matter, pesticide containers and old machinery. Agricultural waste arisings data is not captured in any systematic way, particularly as any waste can often be reused within the agricultural holding it is generated within. This results in many 'permitted development' rights afforded to agricultural holdings, which mean they do not need express planning permission from the Waste Planning Authority. It is therefore the case that the knowledge of this waste stream is limited.

### Waste Management Capacity in Essex and Southend-on-Sea

**4.14** In order to ensure that there is adequate provision for the management of waste it has been essential to establish how much waste is being managed now and how much waste is likely to need to be managed in the period to 2032. The table below sets out the current capacity in the Plan area:

**Table 2 Summary of Existing Waste Management Capacity**

Facility Type	Operating and Under Construction	
	Number	Estimated Capacity (Tonnes)
Transfer	116	1,776,928
Non-Inert Materials Recovery	120	2,262,963
Biological Treatment	13	280,938
Inert Materials Recovery	39	2,072,073
Energy Recovery	2	21,792
Disposal (Landfill)	12	17,964,802



Facility Type	Operating and Under Construction	
	Number	Estimated Capacity (Tonnes)
Hazardous Landfill	0	The previous facility closed as of April 2014
Total <sup>(4)</sup>	186	22,602,560

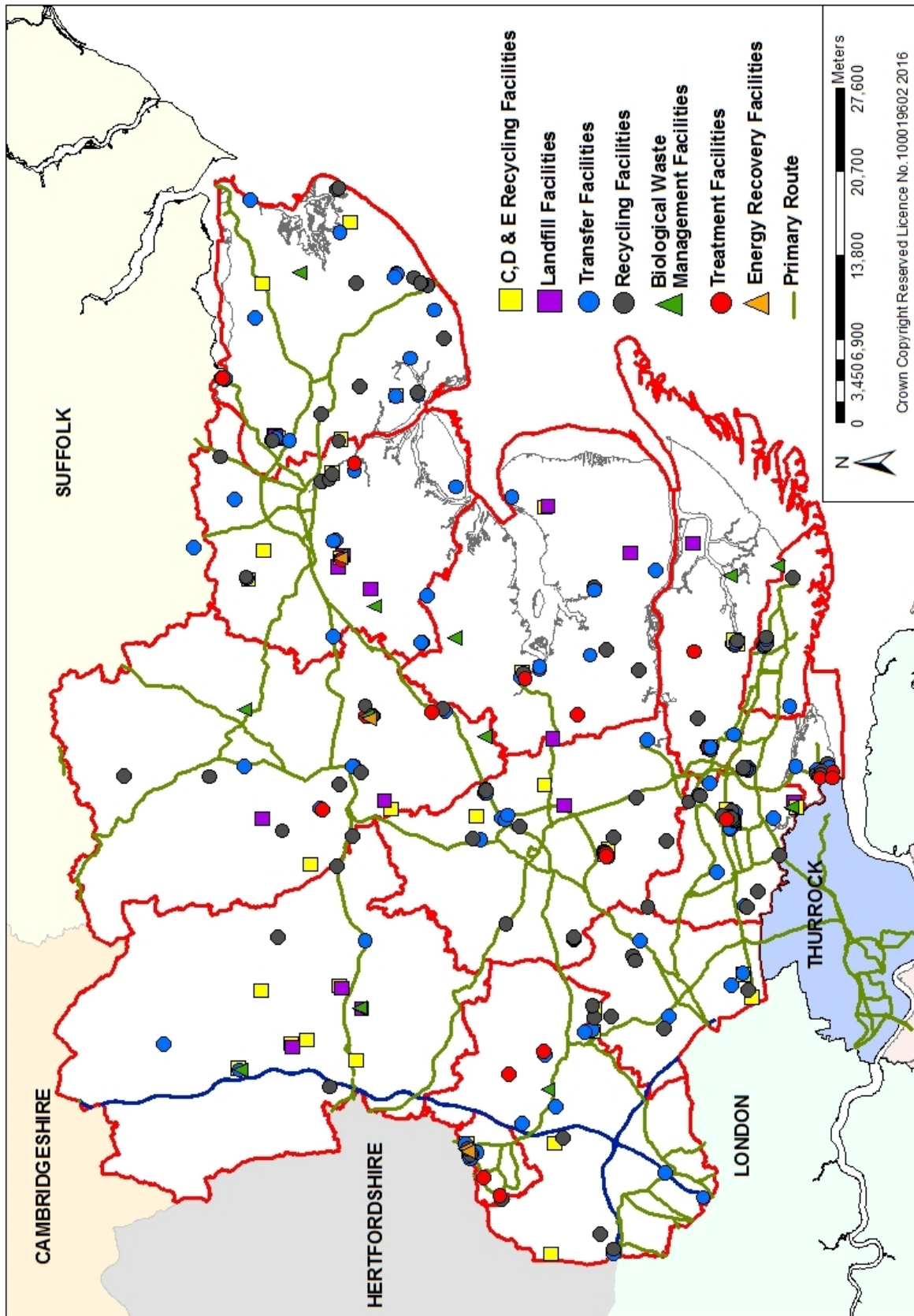
**Source: Essex County Council (2015)**

**4.15** Map 3 highlights the distribution of all 186 waste facilities across Essex and Southend-on-Sea, not including the 153 Waste Water Treatment Facilities also operating in the Plan area. Their location can be found within the Waste Water Treatment Needs Assessment 2014 report. In parallel with other forms of waste development, waste water treatment facilities are dispersed throughout the Plan area although there are clusters which correlate with urban densities, which results in greater clustering in the northeast and southeast as well as a smaller cluster around Harlow in the west.

**4.16** A full list of all permitted waste facilities in operation in the administrative areas of Essex and Southend-on-Sea can be found in the respective Annual Monitoring Reports.

4 \*The number of facilities and estimated capacity described under 'Total' does not include the facilities and estimated capacity included within Transfer facilities, as this would effectively result in double counting of available estimated capacity.

Map 3 All Existing and Under Construction Facilities within the Plan Area (ECC 2015)



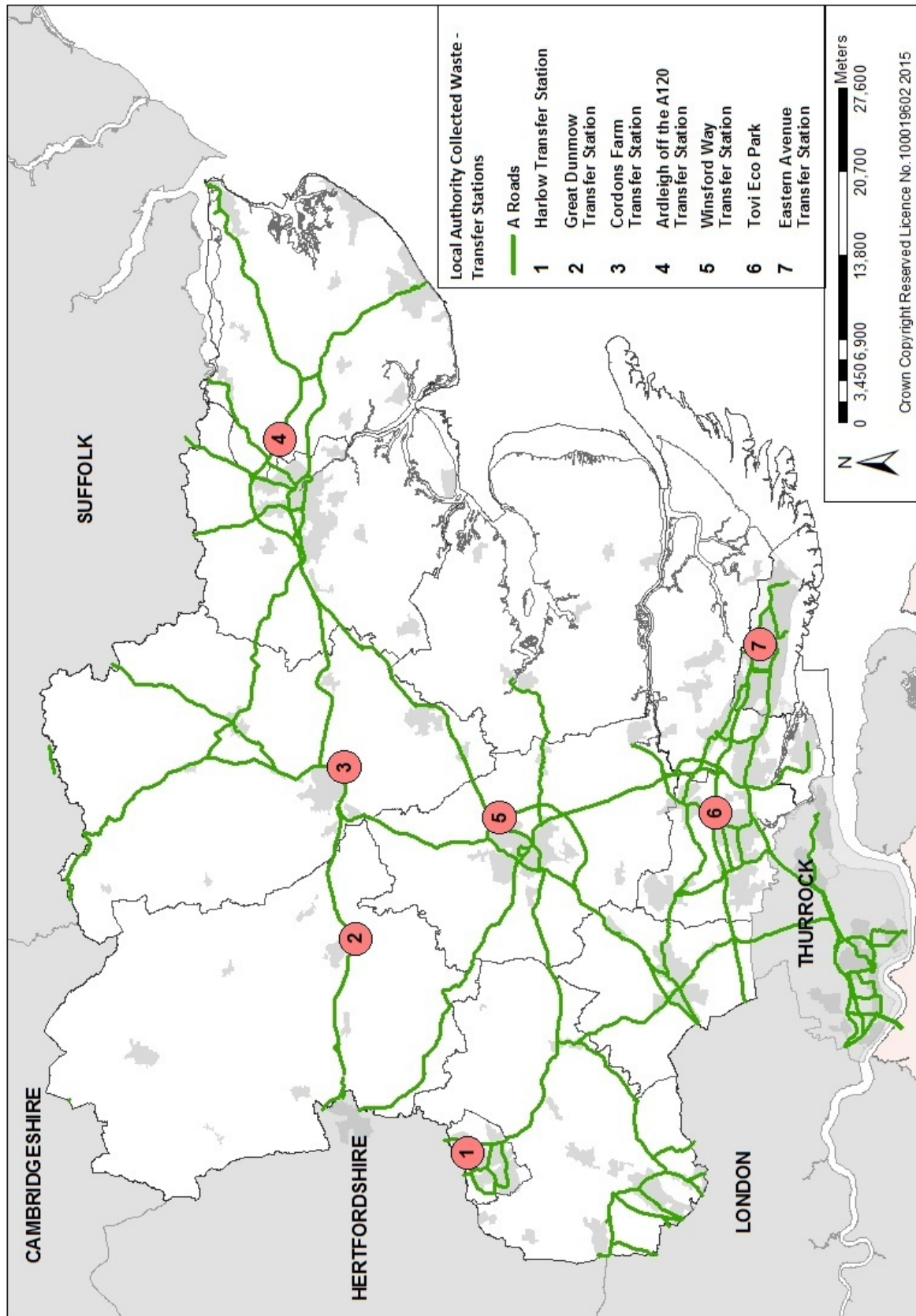
## Local Authority Collected Waste

**4.17** Local Authority Collected Waste, making up approximately 20% of the total amount of waste created in the Plan area, is managed through a network of sites which comprises of the Mechanical Biological Treatment Facility at Tovi EcoPark, a network of Recycling Centres for Household Waste and six supporting municipal waste transfer stations, as set out below.

**Table 3 Main Local Authority Collected Waste Sites**

Site Name	District
IWMF Tovi EcoPark (Courtauld Road)	Basildon
Harlow	Harlow
Winsford Way	Chelmsford
Eastern Avenue	Southend-on-Sea
Great Dunmow	Uttlesford
Cordons Farm	Braintree
Ardleigh off A120	Tendring

Map 4 Local Authority Collected Waste Transfer Stations



**4.18** Commissioning of the Mechanical and Biological Treatment Facility at Tovi Eco Park began in November 2014 with full service commencement expected during 2016. This facility, coupled with its associated network of supporting waste transfer sites, provides sufficient capacity to recover materials from the residual waste fraction of LACW in the Plan area. At present, the Waste Disposal Authority is exploring long term options surrounding the final destination for the stabilised residual waste output of the Tovi Eco Park Facility; this programme of work will be developed after the facility has achieved full service commencement. Currently the output of the facility is exported from the Plan area via Tilbury Docks and utilised in energy plants in the Netherlands.

**4.19** In respect of the source segregated bio-waste fraction of LACW (i.e. kerbside collected food waste and garden waste), much of this is managed within the Plan area under short term contracts utilising merchant facilities. The Essex County Council Waste Disposal Authority is in the process of procuring a long-term bio-waste solution to address this need, which may result in even higher levels of county self-sufficiency. To ensure that capacity is available for the sustainable management of this waste in the long term, the WLP makes provision for LACW bio-waste treatment through allocated sites.

### **Non Local Authority Collected Waste**

**4.20** Non-Local Authority Collected Waste totals approximately 80% of the waste that requires managing in the Plan area, and is formed of all the waste streams set out in 'Main Waste Streams in the Plan area', excluding LACW. Despite waste prevention and reduction initiatives implemented across the Plan area, the evidence associated with this WLP shows that in order to meet national policies and waste targets, the Waste Planning Authorities will need to make provision for some new waste management facilities during the Plan period. These new facilities will address the shortfall in existing waste management capacity identified for those waste streams not controlled by the Waste Planning Authorities, as outlined in The Waste Challenge - At a Glance.

## The Waste Challenge - At a Glance

### 4.21 Non Hazardous Waste

There has been and will continue to be cross-boundary movements of waste. Planning Practice Guidance states that imports of waste from Greater London require specific consideration. The Vision & Strategic Objectives of this Plan therefore recognises the need to continue to make provision for imports from London, albeit at a reducing rate. After 2026, imports of non-hazardous waste to landfill should only be of non-recyclable and non-biodegradable wastes, while some provision may also be made for the management of residues suitable for energy recovery at consented plant.

Non-organic, non-hazardous waste arisings within the Plan area are expected to moderately increase during the Plan period. In 2015, it was estimated there were 1.57mt of this type of waste arising in the Plan area. By 2031/32, arisings are estimated to be 1.67mtpa. Imports of non-hazardous waste from London have been estimated to be in the region of 375,000 tpa in the early years of the Plan reducing down to around 150,000 tpa at the end of the Plan period.

Organic non-hazardous waste arisings within the Plan area are also expected to increase slightly during the Plan period. In 2015, it was estimated that there was 331,000t of organic non-hazardous waste arising in the Plan area. By 2031/32, arisings are estimated to be 349,000tpa.

Consented operational capacity is expected to decline from 221,000tpa to 131,000tpa should no further planning permissions be granted over the Plan period. Consequently there will be a requirement for 218,000tpa of new organic treatment capacity by 2031/32.

At present, the Waste Disposal Authority is considering long term management options for the stabilised residual waste output of the Tovi Eco Park Facility. In 2016, the annual 200,000t output from this facility was exported from the Plan area. In line with the Plan's Strategy for the Plan area to become net self-sufficient with regard to its waste management needs where practicable, the Plan includes a site allocation which has capacity to potentially manage this residual waste in the Plan area in the longer term.

Assuming that suitable facilities are delivered on the sites allocated in this Plan, it is forecast that some non-hazardous landfill void space will exist at the end of the Plan period. However, in accordance with the waste hierarchy, this remains the option of last resort and is not considered to be a substitute for developing further treatment capacity that will move waste up the hierarchy.

### 4.22 Construction, Demolition and Excavation Waste

It is estimated that local Construction, Demolition and Excavation waste arisings was 3.62mtpa in 2014 (including 0.31mt of waste imported from London).

It is identified that there is a need for an additional 1.95mtpa of Construction, Demolition and Excavation management (recycling or disposal) capacity by 2031/32, partly due to the expiry of existing temporary planning permissions.

Locally collected evidence suggests that there is further diversion from landfill through beneficial re-use of inert waste, which equated to approximately 765,000tpa in 2014.

It is estimated that there is a current inert landfill void space of approximately 3.25 million m<sup>3</sup>, which would equate to approximately 5.1 million tonnes of capacity. This is, however, not sufficient to accommodate the forecasted need for inert waste management capacity over the Plan period, to accommodate both the needs of the Plan area and the inert waste projected to be imported from London. To address this, sites capable of providing 490,000 tpa of inert waste recycling capacity and inert waste landfill sites capable of accommodating 14.08million tonnes in total is allocated in the Plan. It is, however, recognised that a proportion of the total inert waste recycling capacity is temporary in nature, and without further permissions, the total inert recycling capacity is likely to reduce to 340,000tpa at the end of the Plan period.

Nonetheless, even after the allocation of all sites suitable for inert waste recycling and inert waste landfill, there is a further need to find management solutions for a total of 7.05mt of inert waste. Since no other submitted sites have been deemed suitable for the management of inert waste in the Plan area, locational criteria policies would be used to assess any additional future inert waste management proposals.

#### **4.23 Hazardous Waste**

In 2014, most of the 113,000tpa of hazardous waste requiring management was exported from the Plan area for final management. Of this around 23,000 tpa was disposed to landfill.

The only landfill accepting hazardous waste (Stable Non-Reactive Hazardous Waste -SNRHW) within the Plan area closed in April 2014, so, in 2016, waste was being disposed of at sites beyond the Plan area. This facility, on average, accepted approximately 50,000 tonnes of SNRHW per annum, which included imports from other authority areas as well as waste generated within the Plan area.

Hazardous waste is not subject to net self-sufficiency within this Plan due to the specialist nature of the facility type and the relatively small quantities generated within the Plan area.

A new site for a Stable Non-Reactive Hazardous Waste Landfill with a total capacity for 30,000 tonnes is allocated in the Plan. No other proposals for the management of hazardous waste in the Plan area were submitted. Locational criteria policies would be used to assess any future hazardous waste proposals should the market identify a need for further facilities in the Plan area.

#### **4.24 Radioactive Waste**

Bradwell Nuclear Power Station is a licensed Nuclear Site and is the principal source of radioactive waste arisings within the Plan area whilst the Power Station is decommissioned. At present, there is sufficient national LLW disposal capacity and sufficient local ILW interim storage capacity for this decommissioning process.

The Replacement Waste Local Plan needs to be flexible regarding this waste stream as there is the potential for a new nuclear power plant to be constructed at the Bradwell site.

Radioactive waste from non-nuclear sources represents a very small waste stream largely managed within the wider non-hazardous waste stream. No proposals for the management of nuclear or non-nuclear radioactive waste in the Plan area were submitted as part of the preparation of the Plan.

Locational criteria policies provide the means by which future nuclear and non-nuclear waste proposals will be assessed should the market identify a need for further facilities in the Plan area.

#### **4.25 Wastewater**

Currently, wastewater treatment across Essex and Southend-on-Sea is provided via a total of 153 Water Recycling Centres (WRC);

The vast majority of WRCs have capacity to accept wastewater from proposed growth in the Plan area without the need for improvements to existing facilities;

Sludge generated in the WRC can be sent for further treatment for use as agricultural fertiliser or power generation. The sludge treatment strategies provided by operators, indicate that there is adequate capacity for sludge treatment and disposal during the Plan period.

### **Future Waste Capacity Requirements**

**4.26** Progress has been made on the provision of new and more sustainable facilities in the Plan area, including those provided in connection with the contracts for recycling and treatment of Local Authority Collected Waste. There remains, however, a need for further new facilities for the recycling, treatment and disposal of other waste streams. An enhanced provision of Recycling Centres for Household Waste will also be required to reflect changes in local population and demand.

**4.27** Ongoing economic growth including regeneration, construction and development, will affect the future volumes of waste generated in Essex and Southend-on-Sea. Through this Plan, the Waste Planning Authorities of Essex and Southend-on-Sea must ensure that adequate waste management capacity is delivered to meet future needs for the waste that is produced. This must be carried out in the context of the Plan area, whilst protecting and enhancing the local environment, supporting economic growth and people's quality of life as summed up in Portrait of the Plan Area - at a glance. Although landfill has traditionally been a significant form of waste management within the Plan area, capacity is reducing and there needs to be a move away from landfill and up the Waste Hierarchy. These new private waste facilities will be essential to a more sustainable approach to dealing with waste in the Plan area, and to enable a move away from reliance on landfill in future.

**4.28** The future waste management capacity requirements of the Plan area have been calculated through the Waste Capacity Topic Paper 2015 which builds on the analysis originally presented in the Capacity Gap Report 2014. The reports model future waste arisings alongside existing operational waste capacity to identify future waste treatment and disposal requirements in the Plan area to 2032.



## Biological waste treatment

**4.29** A capacity gap has been identified for biological waste treatment, increasing to 217,000tpa by 2031/32. Biological treatment involves the harnessing of microorganisms to break down organic waste. Such waste can include food waste, green waste and paper waste. The products of biological treatment are typically useful, with all biological treatment facilities producing a compost type material or soil improver. As such, biological treatment is considered to be in the 'Recovery' section of the Waste Hierarchy as whilst the product is useful, it is not the same as the feedstock which is delivered to the facility. Composting facilities break down the organic waste aerobically (in the presence of oxygen). In the case of anaerobic digestion, this process takes place anaerobically (without oxygen), and along with a composting material, produces biogas which can be used to generate heat and electricity.

**4.30** The following waste management facility types are considered to contribute to the biological treatment of waste:

- In-Vessel Composting facilities (enclosed);
- Open Windrow Composting facilities (outdoor) and
- Anaerobic Digestion (AD).

## Inert Waste Management

**4.31** A capacity gap has been identified for inert waste management, of 1.5mtpa by 2031/32. Construction, Demolition and Excavation waste can be processed and reused/recycled as a construction material. Whilst the resultant material is typically lower grade, recycled inert material can still often act as a substitute for freshly excavated material. Due to the fact that this waste can be processed and/or reused for its original use, it can fall under the 'Re-use' or 'Recycling' tier of the Waste Hierarchy. Recycling processes involve the removal of materials such as wood, plastic and metal, a process that can be carried out at both enclosed and open-air facilities. Should insufficient recycling capacity be delivered, the waste can be sent for disposal by way of inert landfill. Final disposal as a means of managing waste is recognised as the least desirable solution and should only be explored when other options are not appropriate. However, there will continue to be a need for an element of inert landfill as it is not possible to recycle all of this waste.

## Hazardous Waste Management

**4.32** A capacity gap has been identified for hazardous waste management of 50,250tpa by 2031/32. Hazardous waste disposal involves the disposal of waste that can pose a potential threat to public health when improperly treated, stored, transported or disposed of.

## 5 The Strategy

**5.1** This chapter sets out the Plan Vision, Strategic Objectives, and Spatial Strategy for Essex and Southend-on-Sea up to 2032. The 'Vision' sets an aspiration for how waste will be managed in the Plan area by the end of the Plan period. From the Vision, a number of 'Strategic Objectives' are defined. These are the issues and opportunities that must be addressed in order to achieve the Vision. Finally, the 'Spatial Strategy' provides the means by which the Strategic Objectives are proposed to be met within the context of the Plan area.

**5.2** The Plan is based on the principle of net self-sufficiency, where practicable. This means having sufficient waste transfer, recycling, recovery, and disposal capacity within the Plan area to manage the amount of waste generated, with only limited cross border movements with other authorities. Such an approach recognises that waste travels across administrative boundaries, with the distance travelled being, at least in part, related to the volume of waste required to make a facility economically viable set against the amount of waste expected to arise in a given area. The smaller the quantity of a waste type generated, the less practical it is to be net self-sufficient due to economies of scale making small, purely local facilities unviable. Particularly specialist types of waste travel beyond one or more administrative boundaries.

**5.3** The principle of net self-sufficiency does not apply to hazardous waste or radioactive waste as it is not considered practical to provide for such specialist facilities on the basis of net self-sufficiency within the Plan area.

**5.4** The Vision is predicated on the Waste Hierarchy which sets out the five different methods for the management of waste, ranked according to environmental impact. The Hierarchy focuses on the prevention of waste in the first instance, followed by a preference for preparing waste for re-use, recycling and other types of recovery in that order, with disposal to landfill as a last resort.

**5.5** The Vision also sets out an approach to climatic issues reflective of national policy. The NPPW (Section 1) recognises the role that driving waste up the Waste Hierarchy has on mitigating and adapting to climate change. The NPPF also states (para 93) that planning plays a key role in providing resilience to the impacts of climate change. The Vision therefore states that the design and location of future facilities will be sympathetic to climate change.

**5.6** The co-location of complementary waste treatment facilities with other waste and non-waste developments, which could utilise waste as a resource, aligns the Plan with the notion of a 'circular economy'. In November 2015, the UK government provided a response to the European Commission public consultation on the circular economy. The principle of a circular economy is incorporated into the Vision and any future plan review will assess the implications.

**5.7** The Vision reflects the reducing provision made for London's waste exports to Essex and Southend-on-Sea in line with the waste forecasts in the adopted London Plan (2015). This respects the Duty to Co-operate process that Essex, Southend-on-Sea and London entered into to aid the formation of both the London Plan (2015) and this WLP.

## **Vision**

*By 2032, Essex and Southend-on-Sea, will be net self-sufficient<sup>(5)</sup> in waste management, where practicable. Households, businesses, the public sector and voluntary organisations within the Plan area will be taking responsibility for waste prevention, re-use and recycling. Where waste is unavoidably created, all opportunities to recover the value from waste will be explored in order to minimise the amount of waste sent to landfill to help achieve a 'circular economy'.*

*The Plan will provide sufficient waste management infrastructure in Essex and Southend-on-Sea to meet the existing and forecasted amount of waste expected to arise over the Plan period. The forecast includes a decreasing proportion of London's waste exports into the Plan Area, as informed by the adopted London Plan (2015).*

*Waste management facilities will be located, designed and operated without adverse impacts on the amenity of local communities, the natural and historic environment, the landscape and the townscape of Essex and Southend-on-Sea. Opportunities to enhance such features will be supported.*

*The Plan will offer a degree of flexibility whilst still maintaining a Plan-led approach to the delivery of waste management facilities, which is sympathetic to the Waste Hierarchy. The co-location of complementary waste facilities and non-waste developments (e.g. housing and employment) will be encouraged, where appropriate, to facilitate synergies and efficiencies in waste management and transport, whilst recognising the potential for cumulative impacts.*

*Waste management within the Plan area will be undertaken in ways that minimise the impact on climate change, primarily through the minimisation of waste transportation distances and landfilling. Facilities will also be designed and located to reduce the risk from climatic effects such as flooding, particularly in the low-lying coastal areas of Essex and Southend-on-Sea.*

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- 5 *Net self-sufficiency recognises that there will be some cross boundary movement of waste, as it is often more sustainable to take waste to a facility out of the Plan area to reduce waste miles where the source of waste arisings is close to an administrative boundary. Therefore, the premise is to provide for the equivalent quantity of waste arising within the Plan area, irrespective of where it arises.*

## 5.8 The Vision is to be achieved through the following Strategic Objectives.

### Strategic Objectives

SO1. To support the work of partner organisations, including District, Borough and City Councils, the Waste Disposal Authorities, Waste Collection Authorities, the Environment Agency, the waste industry, the business sector and voluntary organisations to promote and maximise waste prevention measures amongst all waste producers, both from the business sector as well as consumers.

SO2. To support an increase in the proportion and the quantity of waste that is re-used, recycled and recovered within the Plan area to meet local targets for recycling and recovery.

SO3. To safeguard and encourage opportunities to enhance existing waste infrastructure which provide an important contribution to waste management at sites that serve the Plan area.

SO4. To achieve net self-sufficiency in waste management by 2032, where practicable, with an associated reduction in the amount of waste from London that is disposed of in the Plan area, in line with the London Plan.

SO5. To make provision, through site allocations, to meet the need for new waste management facilities, and ensure flexibility through the inclusion of Areas of Search and 'criteria-based' locational policies.

SO6. To support the reduction of greenhouse gas emissions, primarily by moving waste up the hierarchy to minimise the need for landfill and by minimising waste transport and distance by locating new waste facilities in proximity to key growth centres.

SO7. To maximise opportunities for sustainable economic growth through the co-location of waste facilities with other waste uses and/or complimentary non-waste development. This encourages the use of waste as a resource, such as considering it as a potential source of heat and energy.

SO8. To ensure waste facilities and their proposed locations are sustainably designed, constructed and operated to reduce potential adverse effects on human health, amenity and the natural and historic environment.

Justification for these Strategic Objectives can be found below:

SO1 – Whilst the Waste Planning Authority cannot directly require a reduction in waste, it will seek to work with those partner organisations that can influence this objective.

SO2 – The Plan can make provision for facilities considered necessary to move the management of waste further up the Waste Hierarchy.

SO3 – Waste facilities can be problematic to locate due to their size and/or potential impact on local amenity. For existing facilities it is vital that such facilities can continue to operate and contribute to the waste management needs of the Plan area.

*SO4 – In line with the adopted London Plan 2015, the WLP makes provision for a decreasing amount of waste exports from London (excluding excavation waste). With the exception of the need to take a proportion of London’s waste, the WLP only makes provision for sites required to manage the amount of waste arising in the Plan area on a net self-sufficiency basis (where practicable) in conformity with the proximity principle.*

*SO5 – Direct site allocations aim to offer sufficient capacity to deliver waste management requirements during the Plan period. These allocations are supported by Areas of Search to accommodate local needs as well as locational criteria which allow the market flexibility.*

*SO6 – Demonstrates conformity with the NPPW and National Waste Management Plan for England (2013), which recognises that effective waste management reduces potential climatic impacts.*

*SO7 – Co-location offers the opportunity for efficient use of waste as a resource and offers a potential reduction in waste transportation. Ensuring opportunities for ‘other recovery’ acts as another and final potential diversion from landfill, as supported by the Waste Hierarchy.*

*SO8 – Section 5 of the NPPW requires, inter-alia, Waste Planning Authorities to assess the suitability of sites and/or areas for new or enhanced waste management facilities against “the cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community, including any significant adverse impacts on environmental quality, social cohesion and inclusion or economic potential.”*

**5.9** The Spatial Strategy sets out how the over-arching Vision and Strategic Objectives can be implemented in the Plan area. It reflects the complexities of addressing waste issues in a Plan area which incorporates both dense urban areas and those which are very rural. It provides a steer for waste development to be focused in those areas expected to see most growth, and therefore an increased demand for waste management capacity, throughout the Plan period (as defined in the Essex Outcomes Framework 2014 and the Economic Plan for Essex 2014). Such an approach facilitates a reduction in the transportation distance of waste, and therefore aligns the Plan with the Proximity Principle.

**5.10** The Spatial Strategy is supported by the **Picture 2 'Key Diagram'** This diagram sets out the key transport routes in the Plan area and the location of the new sites allocated to accommodate new facilities to meet future waste capacity requirements.

## Spatial Strategy

*The Waste Planning Authorities are planning on the basis of net self-sufficiency, where practicable, in their waste management by 2032. New waste development should be principally directed towards the key urban centres of Basildon, Chelmsford, Colchester, Harlow and Southend-on-Sea. This approach reflects the location of the main population centres and where growth and employment is concentrated in the Plan area. This ensures that the majority of waste arising can be managed and treated as close as possible to its source. There is a recognised need to ensure that other settlements are also adequately served whilst being sympathetic to the infrastructure and amenity constraints in such localities.*

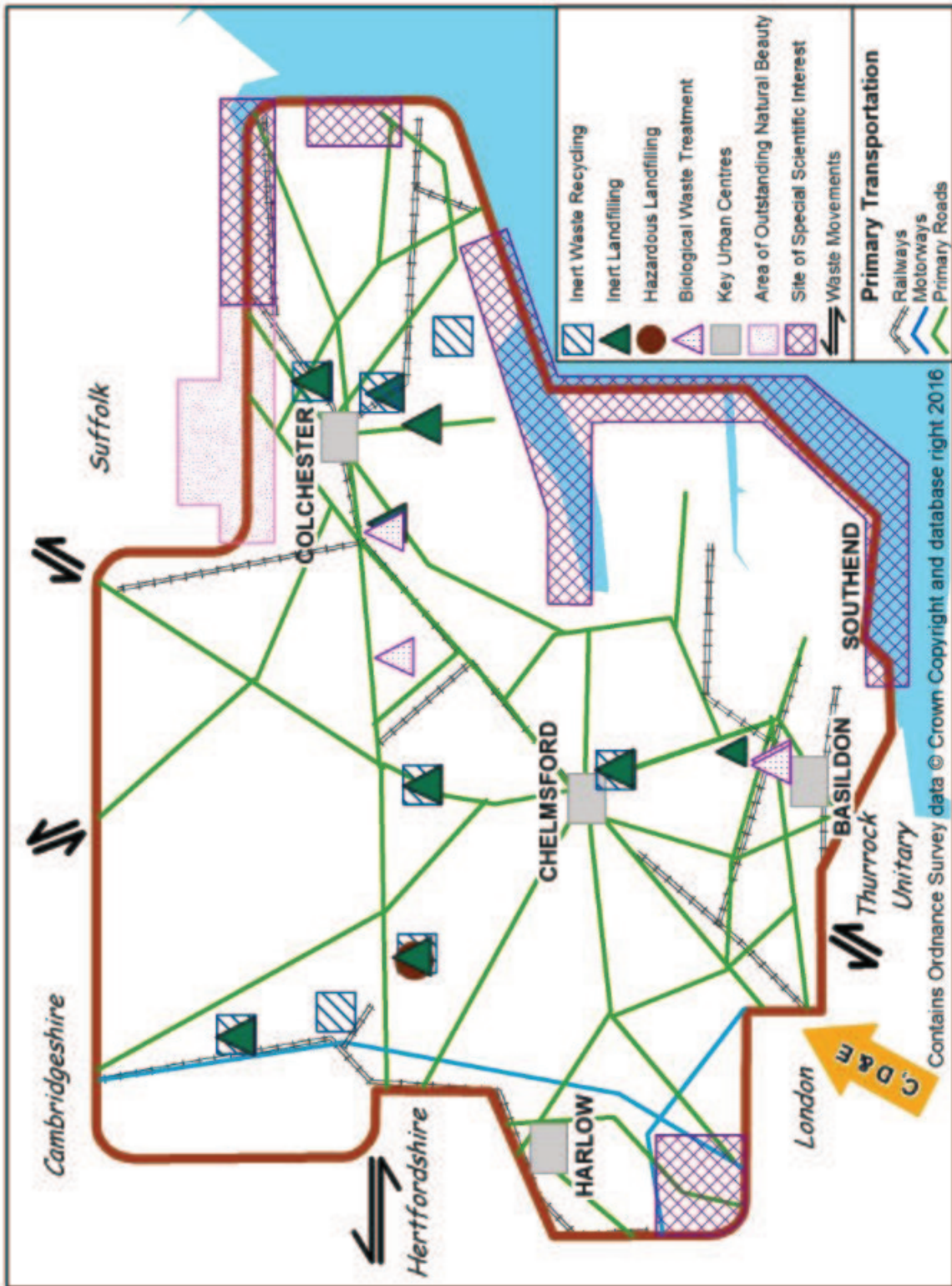
*The Waste Planning Authorities will continue to rely on a network of strategic waste management facilities to manage Local Authority Collected Waste arising in the Plan area. Primarily this is based on the strategic Integrated Waste Management Facility at Tovi EcoPark in Basildon and the supporting network of six Local Authority Collected Waste transfer stations located across the Plan area.*

*In recognition of the complexities of securing appropriate sites for waste management, the allocated and existing sites within the Plan area have been safeguarded. This ensures that the continued operation of these facilities is not adversely affected by other development. New sites have been allocated to meet the forecasted increase in waste management needs for waste streams up to 2032.*

*In order to offer a degree of flexibility within the Plan area, and to direct waste management facilities serving a predominantly local need towards appropriate locations, Areas of Search have been designated. These Areas have been designated around employment areas allocated in Local Development Plan documents which are considered to be suitable for waste development in principle. In recognition that not all waste facility types would be appropriate in employment areas, and to afford further flexibility, locational criteria policies are included to guide the location of waste development proposed during the Plan period.*

*Opportunities to co-locate facilities on existing waste management sites, or alongside compatible non-waste development, will be supported when appropriate to do so. Opportunities to support sustainable waste practises, including the use of waste as a resource will be supported through close working with Local Planning Authorities in the Plan area.*

Picture 2 Key Diagram



## 6 Need and Safeguarding

**6.1** This chapter sets out the policies for addressing the key waste issues and challenges that have been identified in Essex and Southend-on-Sea. These policies enable the Vision and Strategic Objectives to be achieved by delivering the Spatial Strategy. In addition, the policies within this chapter have been influenced by the Sustainability Appraisal which supports the Plan. Allocations and designations referred to in the policies are identified on Key Diagram.

**6.2** Cross referencing within the individual policies has been kept to a minimum and has only been used to avoid misunderstandings. The planning system requires applications to be determined in accordance with the statutory 'development plan' unless material considerations indicate otherwise. This means assessing the applicability of all the policies within this Plan that may apply to specific development proposals, including the development management policies. It also includes the need to consider the supporting text to the policies and the policies and supporting text in other adopted Plans that apply to the Plan area within which the development is proposed.

**6.3** It should be noted that other, non-land use planning controls, may apply to development proposals. These include the environmental permitting regime managed by the Environment Agency.

**6.4** The Plan makes provision for the capacity requirements identified through the Waste Capacity Gap analysis, seeking to deliver net self-sufficiency where practicable and reflecting local circumstances. This is achieved by:

- safeguarding existing waste management capacity (see Safeguarding Waste Management Sites and Infrastructure);
- allocating strategic sites for new facilities (see Strategic Site Allocations) to meet shortfalls in capacity; and
- providing a policy framework for other sites to be considered where there is a proven need for them in the Plan area.

**6.5** Limited cross border waste movements would need to be justified on their merits. They may be acceptable if they would help to enable waste to be dealt with in one of the nearest appropriate installations and would not prejudice the achievement of net self-sufficiency for Essex and Southend-on-Sea.

**6.6** The principle of net self-sufficiency does not apply to hazardous and radioactive waste. This is because the management of the relatively small amounts of such waste generated will usually take place at either specialist facilities for a particular industry or larger facilities to meet a national or regional need.



## Policy 1

### Need for Waste Management Facilities

*In order to meet the future needs of the Plan area, waste development will be permitted to meet the shortfall in capacity of:*

- a. *Up to 218,000 tonnes per annum by 2031/32 of biological treatment for non-hazardous organic waste;*
- b. *Up to 1.95 million tonnes per annum by 2031/32 for the management of inert waste;*
- c. *Up to 200,000 tonnes per annum by 2031/32 for the further management of non-hazardous residual waste; and*
- d. *Up to 50,250 tonnes per annum by 2031/32 for the management of hazardous waste.*

### Waste Consultation Areas

**6.7** Safeguarding will be implemented through Waste Consultation Areas which are defined around all permitted waste developments (as indicated in the Annual Monitoring Report) and sites allocated in this Plan. Proposed development, including that proposed in Local Plans, within 250m of a safeguarded site (or 400m of a Water Recycling Centre - WRC); will be subject to consultation with the Waste Planning Authority. Waste Consultation Areas will be communicated to the Essex districts and the unitary authority of Southend-on-Sea Borough Council. Sensitive uses should not be located adjacent to, or within, 250 metres (or 400m of a WRC) of any part of a safeguarded site. However, the actual buffer needed around each site will depend upon the nature of the proposed 'sensitive' use and on the specific impacts of the current waste operation.

**6.8** There will be instances where a proposed non-waste use may not compromise the operation of an existing or future waste management facility operating within that safeguarded site. As such, Development in Waste Consultation Area sets out those development types which, when coming forward in Waste Consultation Areas, the Waste Planning Authority would not need to be consulted.

**6.9** Existing and allocated waste sites and infrastructure will be protected from inappropriate neighbouring developments that may prejudice their continuing efficient operation. Waste development is not normally a high-value use in comparison with other land uses and as such the existing and allocated sites and facilities are safeguarded as they make an important contribution to the management of waste arising in Essex and Southend-on-Sea. Without a safeguarding policy, sites required to achieve a sustainable distribution of waste management facilities could be lost to other development. Sites covered by this policy that become vacant or where the existing waste use ceases operation, will continue to be subject to safeguarding. In some cases, the loss of a site or facility may be acceptable, for example where it would enable the implementation of a town centre improvement strategy and it can be demonstrated that the wider social and/or economic benefits resulting from such a scheme outweigh the retention of the waste use. In such instances, alternative provision for the displaced waste use will be required should such capacity continue to be necessary.

**6.10** In some cases, the potential adverse impact on a waste site or operation of a waste facility may not be contested by the WPAs. Such instances could include scenarios where it can be ascertained that there are wider social, environmental and/or economic benefits resulting from new development that may outweigh the retention of the waste use. In such instances, alternative site provision for the displaced waste use could be required should such capacity continue to be necessary.

**6.11** Whilst Waste Consultation Zones apply to all permitted waste facilities in the Plan area, the WPAs are unlikely to object to development in close proximity to a small scale, non-specialist facility, defined in this Plan as those with an annual capacity of 10,000tpa or less.

**6.12** The identification of alternative provision could be made by the relevant Local Planning Authority, the applicant for the non-waste development or potentially be considered through a focused review of this Waste Local Plan. This aims to ensure that no shortfall in equivalent waste management capacity occurs in Essex and Southend-on-Sea during the Plan period. Any loss of waste capacity in the Plan area will be monitored through the Annual Monitoring Report.

**6.13** The network of Local Authority Collected Waste facilities comprising the Integrated Waste Management Facility at Tovi EcoPark, Basildon and the six supporting transfer stations are integral for the sustainable management of household waste arising in the Plan area. As such, these sites (listed in Table 2 'Summary of Existing Waste Management Capacity') are to be safeguarded unless it can be demonstrated that they are no longer required for the delivery of the Joint Municipal Waste Management Strategy.

**6.14** Waste management infrastructure includes facilities such as wharves and railheads, which play an important role in the movement of waste materials. All current and any future facilities that come forward for this purpose during the plan period will be safeguarded under this policy.

## Policy 2

### Safeguarding Waste Management Sites and Infrastructure

#### Waste Consultation Areas

*Where non-waste development is proposed within 250m of safeguarded sites, or within 400m of a Water Recycling Centre, the relevant Local Planning Authority is required to consult the Waste Planning Authority on the proposed non-waste development (except for those developments defined as 'Excluded' in 'Appendix C - Development Excluded from Safeguarding Provisions').*

*Proposals which are considered to have the potential to adversely impact on the operation of a safeguarded waste site or infrastructure, including the site allocations within this Plan, are unlikely to be opposed where:*

- a. a temporary permission for a waste use has expired, or the waste management use has otherwise ceased and the site or infrastructure is considered unsuitable for a subsequent waste use; or*
- b. redevelopment of the waste site or loss of the waste infrastructure would form part of a strategy or scheme that has wider environmental, social and/or economic benefits that outweigh the retention of the site or the infrastructure for the waste use, and alternative provision is made for the displaced waste use; or*
- c. a suitable replacement site or infrastructure has otherwise been identified and permitted.*

## 7 Strategic Waste Management Allocations

**7.1** This chapter sets out the policy for locating waste management facilities required to manage waste in the Plan area to 2032. Although it is recognised that capacity gaps remain in all waste streams other than for biological treatment, it is considered that all suitable sites submitted to the Waste Planning Authorities have been allocated.

**7.2** Strategic site allocations have been made to manage the following waste streams in the Plan area:

- biological waste;
- inert waste;
- Non-hazardous residual waste;
- hazardous waste.

**7.3** There will be no requirement for applicants to demonstrate a quantitative or market need for a proposal on a site allocated in Policy 3; this is because they have been allocated to meet identified shortfalls in waste management capacity in order to deliver the objective of net self-sufficiency. The Authorities will keep the allocated sites under review to ensure that they are deliverable and continue to be required to meet identified shortfalls in capacity. This information will be reported annually in the Minerals and Waste Annual Monitoring Report.

**7.4** To encourage more efficient use of existing waste capacity, existing permitted waste sites are considered suitable, in principle, for the intensification of existing uses and the co-location of new waste facilities. There may also be instances where land adjoining existing waste sites could be satisfactorily incorporated as part of proposals. In some cases, however, it may not be appropriate to locate new built facilities at sites that are operating under a temporary consent or at sites in the countryside. There may also be cases where the existing waste use is inappropriately located and should not be perpetuated. Therefore, any proposal for an extension beyond the boundary of an existing site will be treated as a new site.

### Policy 3

#### Strategic Site Allocations

*Waste management development at the following locations (see Strategic Site Allocations Map) will be permitted where proposals take into account the requirements identified in the relevant development principles:*

1. *For biological waste management at:*

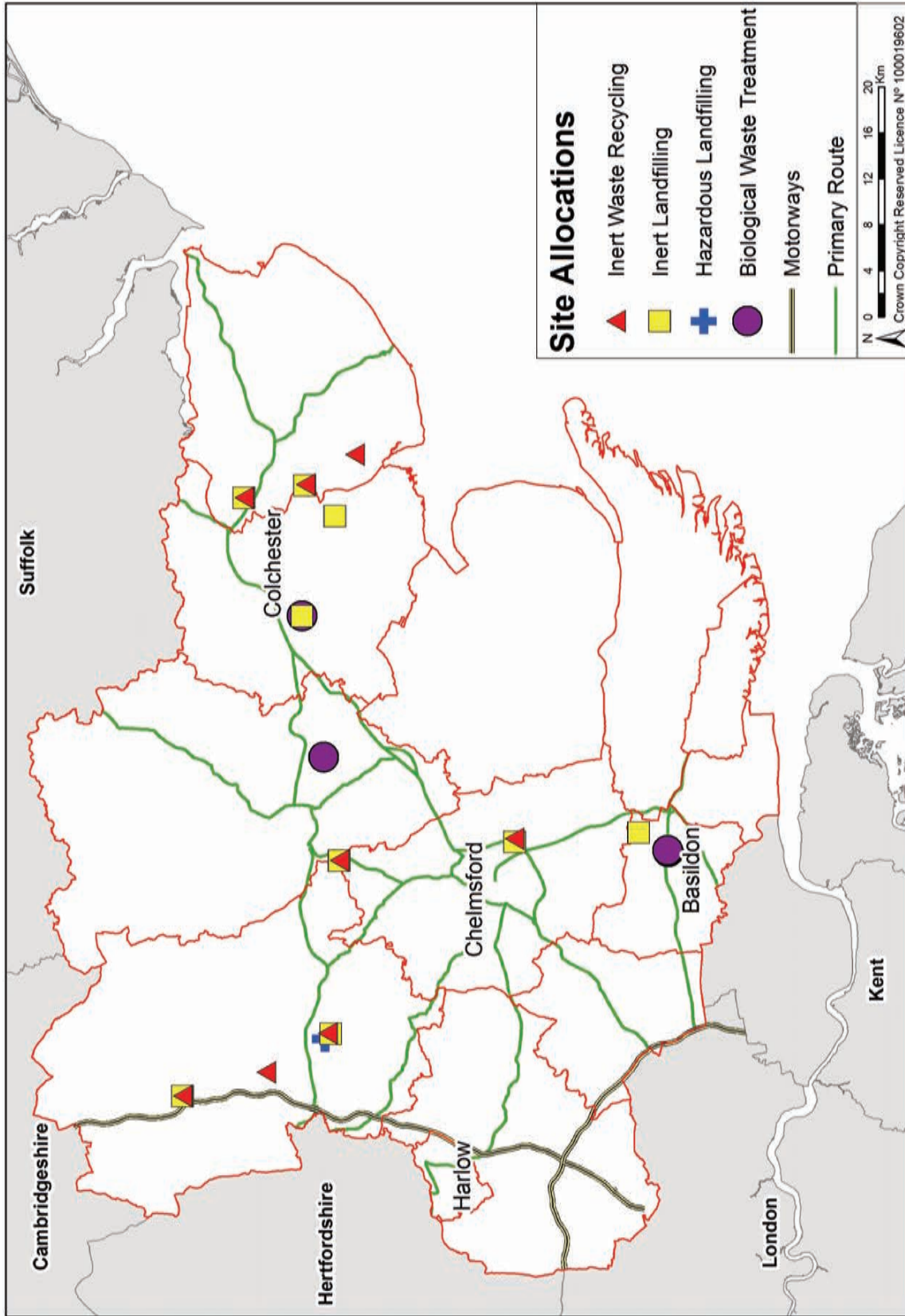
- *Basildon Water Recycling Centre, Basildon (W3);*
- *Bellhouse Landfill Site, Colchester (W29);*
- *Courtauld Road, Basildon (W20); and*
- *Rivenhall, Braintree (IWMF2).*

2. *For inert waste recycling at:*

- *Blackley Quarry, Gt Leighs, Chelmsford (L(i)10R);*
- *Crumps Farm, Gt and Lt Canfield, Uttlesford (W32);*
- *Elsenham, Uttlesford (W8);*

- *Morses Lane, Brightlingsea, Tendring (W31);*
  - *Newport Quarry, Uttlesford (L(i)17R).*
  - *Sandon East, Chelmsford (W7);*
  - *Slough Farm, Ardleigh, Tendring (L(n)1R); and*
  - *Sunnymead, Elmstead & Heath Farms, Tendring (W36).*
3. *For residual non hazardous waste management at:*
- *Rivenhall, Braintree (IWMF2).*
4. *For inert landfill at:*
- *Blackley Quarry, Gt Leighs, Chelmsford (L(i)10R);*
  - *Bellhouse Landfill Site, Colchester (L(n)5);*
  - *Little Bullocks Farm, Gt and Lt Canfield, Uttlesford (L(n)7R);*
  - *Dollymans Farm, Basildon/Rochford (L(i)16)*
  - *Fingringhoe Quarry, Colchester (L(i)15);*
  - *Newport Quarry, Uttlesford (L(i)17R);*
  - *Sandon, Chelmsford (L(i)6);*
  - *Slough Farm, Ardleigh, Tendring (L(n)1R); and*
  - *Sunnymead, Elmstead & Heath Farms, Tendring (L(i)5).*
5. *For hazardous landfill at:*
- *Little Bullocks Farm, Gt and Lt Canfield, Uttlesford (L(n)8R).*

Map 5 Strategic Site Allocations



## 8 Areas of Search and Locational Criteria

### Introduction

**8.1** Areas of Search and the locational criteria policies are included to afford the Plan greater flexibility than a reliance on allocated sites only. Areas of Search comprise existing employment areas considered to be suitable, in principle, for a waste management use. Locational criteria policies identify where waste management development may also be appropriately located within the Plan area when proposals are brought forward on non-allocated sites or outside of an Area of Search.

**8.2** It is recognised that both Areas of Search and the locational criteria policies offer less certainty than site allocations in terms of where waste development may occur in future. However, it is important that this Plan is able to respond flexibly to any potential change in demand from the waste industry. This could be future changes in terms of the number of facilities required as well as changing circumstances influencing the suitability or viability of any direct site allocation – such as changes in site ownership. Areas of Search and locational criteria thereby expand the scope of potential sites that are considered suitable for waste management, whilst still retaining a plan-led approach to support the delivery of waste management facilities in the Plan area.

**8.3** Areas of Search may be able to provide an alternative to site allocations, should some of these allocations become undeliverable in the future. Areas of Search also provide a policy steer for those waste management sites that serve a more local need to be located on existing employment areas over other, less sustainable locations. Proposals coming forward in an Area of Search will still be subject to a full planning application and assessed against the policies in this Plan.

**8.4** Locational criteria policies allow the Waste Planning Authorities to consider planning applications for developments of any size coming forward on any non-allocated site or outside of an Area of Search, to ensure that waste management development takes place without an unacceptable impact.

**8.5** In accordance with a Plan-led approach, it is intended that waste management facilities be developed on sites that have been allocated within the Plan or within an employment area designated as an Area of Search. Where it can be demonstrated that a site allocation and Area of Search is not suitable, recourse will then be made to the locational criteria policies, which set out the type of land uses considered suitable for different types of waste management facilities. Waste management development proposed anywhere other than upon site allocations or Areas of Search will be expected to justify why the proposed unallocated site is at least as suitable for such development as the site allocations or Areas of Search, with reference made to the site assessment methodology. Such proposals will also be required to justify the need for that facility to be located within the Plan area, based on the principal of net self-sufficiency.

### Areas of Search

**8.6** Areas of Search are designated where, in principle, the Waste Planning Authorities may support waste management development outside of the allocated sites.

**8.7** The focus for the Areas of Search has been on employment land within industrial estates that have existing planning policy support for B2 (General Industry) and B8 (Storage or Distribution) uses under the Use Class Order.<sup>(6)</sup> Under this Order, waste management facilities are generally considered as sui generis ('in a class of its own') and therefore do not fit under a specific use class. It is, however, considered that employment land designated for B2 and B8 uses represent the most suitable land as many waste management operations are similar in nature and impact to industrial activities and storage and distribution facilities. Many of the Areas of Search are also near to the key centres for growth and so support the overarching Spatial Strategy. The Waste Planning Authority has a preference for waste management facilities to come forward in these locations over those which may be less suitable such as Greenfield sites or sites less well connected to main transport infrastructure or close to sensitive areas.

**8.8** Areas of Search have not been promoted by landowners for a particular waste management use, unlike site allocations. They are also unlike site allocations as exact site boundaries are not defined, nor are they proposed to manage a specific waste stream. As such, Areas of Search have been chosen using bespoke selection criteria.<sup>(7)</sup>

**8.9** As highlighted above, the intention is for these Areas of Search to act as a guide for waste operators seeking to develop a site within the Plan area. By virtue of showing a preference for proposals coming forward in employment areas, the Areas of Search act to help move waste up the Waste Hierarchy as it is a land use type which precludes landfill.

**8.10** Proposals within the Areas of Search will normally require express planning permission and will be considered against other relevant policies in the WLP, including Policy 10 – Development Management, and the wider Development Plan as a whole. The need to consider the wider Development Plan is important as it is the relevant Local Plan which determines whether an Area of Search designation remains relevant. Should a Local Plan seek to re-allocate land pertaining to an Area of Search away from B2/B8 uses, the criteria upon which Areas of Search are based would no longer be fulfilled. In such instances, the location would cease to be an Area of Search and Policy 4 would no longer apply. The design and operation of waste management facilities proposed within Areas of Search should be compatible with existing uses in the employment area.

**8.11** Maps showing each of the Areas of Search designated are set out in [E 'Appendix E - Areas of Search: Development Principles'](#)

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6 The Town and Country Planning (Use Classes) Order 1987 (as amended) puts uses of land and buildings into various categories known as 'Use Classes'.

7 Further information on the methodology used for designating Areas of Search can be found in the ['Areas of Search: Assessment and Methodology'](#).



## Policy 4

### Areas of Search

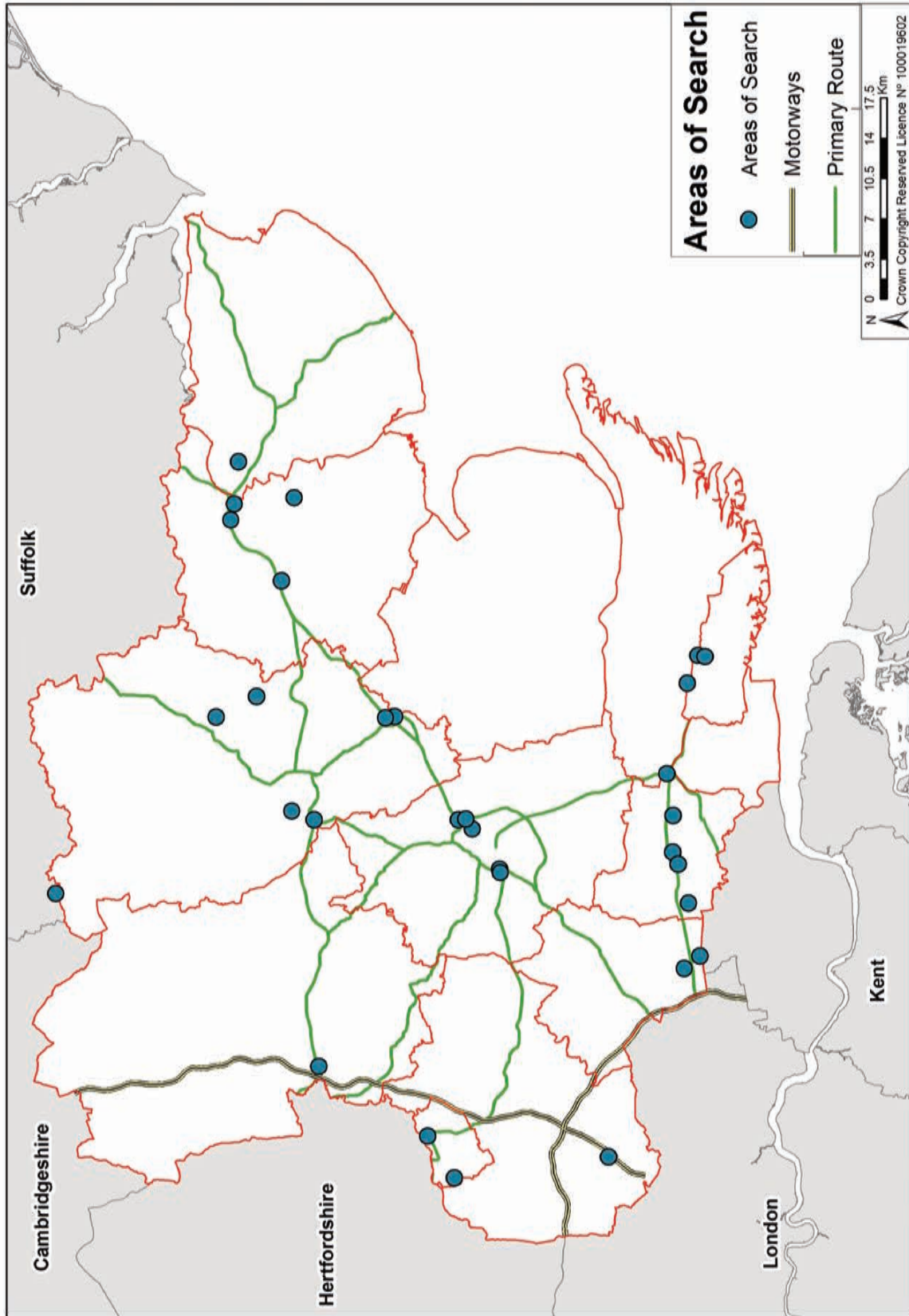
Proposals for waste management development in the following Areas of Search, as defined on the Policies Map, will be supported in principle provided that the design and use of the facility is compatible with existing uses in the employment area.

Proposals will be considered against other relevant policies of this Plan and the wider Development Plan.

Area of Search	District	Area of Search	District
Burnt Mills Central	Basildon	Westways	Chelmsford
Festival Business Park	Basildon	Widford Industrial Estate	Chelmsford
Pipps Hill	Basildon	Land off Axial Way, Myland	Colchester
Southfield Business Park	Basildon	Severalls Industry Park	Colchester
Bluebridge Industrial Estate	Braintree	Tollgate, Stanway	Colchester
Earls Colne Airfield	Braintree	Whitehall Road Industrial Estate	Colchester
Eastways-Crittall Road, Waterside Park	Braintree	Langston Road/Oakwood Hill, Loughton	Epping Forest
Freebournes Industrial Estate	Braintree	Pinnacles and Roydenbury Industrial Estate	Harlow
Skyline 120	Braintree	Temple Fields	Harlow
Springwood Industrial Estate	Braintree	Rochford Business Park	Rochford
Sturmer Industrial Estate Area 1	Braintree	Michelins Farm	Rochford
Childerditch Industrial Estate	Brentwood	Stock Road	Southend-on-Sea

Area of Search	District	Area of Search	District
West Horndon	Brentwood	Temple Farm	Southend-on-Sea
Drovers Way	Chelmsford	Martell's Farm Industrial Area	Tendring
Dukes Park Industrial Estate	Chelmsford	Springfield Business Park	Chelmsford
Start Hill, Great Hallingbury	Uttlesford		

Map 6 Areas of Search



## Locational Criteria for Waste Management Facilities

**8.12** Locational criteria establish guiding principles for locating new waste development outside allocated sites or designated Areas of Search outlined in this Plan. As with the Areas of Search, locational criteria seek to provide greater flexibility to the waste industry to react to change and meet demand. They support the Plan-led approach to providing sustainable waste management opportunities to meet the identified future capacity needs in the Plan area.

**8.13** As stated throughout the Plan, there is a strong preference for waste development to be delivered on site allocations and Areas of Search before alternative (unallocated) locations are considered, thereby helping achieve the Plan's Vision and Spatial Strategy. In contrast to allocated sites or Areas of Search, proposals for waste management development on unallocated or non-designated sites would need to evidence:

- that the proposal would deliver the capacity to provide for Essex and Southend-on-Sea's waste management needs;
- that the site allocations and Areas of Search are not appropriate sites for the delivery and operation of the proposed facility, and/or are unavailable.

**8.14** In conjunction with 9 'Development Management Policies' the Locational Criteria seek to ensure that proposals on new, non-allocated, sites are as suitable for waste development as the allocated sites identified in this Plan. A summary of the methodology used to select the allocated sites is included at D 'Appendix D - Summary of Site Identification and Assessment Methodology'

**8.15** Waste management development can, depending on its type, be delivered in either enclosed or open facilities. Enclosed facilities can be broadly similar in appearance to other industrial processes which take place within warehouses. Some examples are listed in the table below. Open facilities, which although occasionally can also be partially enclosed, largely deal with waste in the open air. Examples of open waste facilities include inert waste recycling and open windrow composting developments.

**Table 4 - Waste Facility Types**

Broad Waste Facility Type	Example Waste Facility
Enclosed Waste Facilities (housed in buildings)	Transfer Station
	Storage
	Materials Recovery Facility (MRF)
	Metal Recycling Facility
	End of Life Vehicle (ELV) Recycling Facilities
	In-vessel Composting Facility
	Mechanical Biological Treatment Facility (MBT)

Broad Waste Facility Type	Example Waste Facility
Enclosed Thermal Facilities (housed in buildings with flues and/or digestate piping)	Combined Heat and Power Facilities (CHP)
	Gasification and Pyrolysis Facilities
	Anaerobic Digestion (AD)
	Autoclaving Facilities
Open Air Facilities	Construction, Demolition and Excavation (CD&E) Recycling Facilities (or inert recycling)
	Metal Recycling Facility
	End of Life Vehicle (ELC) Recycling Facilities
	Windrow Composting Facilities
	Water Recycling Facilities (WRCs)
	Inert Landfill Sites
	Non-Hazardous Landfill Sites
	Hazardous Landfill Sites

## Enclosed Waste Facilities

**8.16** Most types of enclosed waste facilities, regardless of the technology used or waste type being processed, have similar locational requirements due to their potential to impact on local amenity and the environment. Such facilities are therefore directed towards specific suitable locations where these impacts can be more easily accommodated.

**8.17** This policy also covers proposals for specialised enclosed facilities such as clinical waste treatment or energy from waste facilities.

### Policy 5

#### Enclosed Waste Facilities on unallocated sites or outside Areas of Search

*Proposals for new enclosed waste management facilities will be permitted where:*

1. *the waste site allocations and the Areas of Search in this Plan are shown to be unsuitable or unavailable for the proposed development;*
2. *although not exclusively, a need for the capacity of the proposed development has been demonstrated to manage waste arising from within the administrative areas of Essex and Southend-on-Sea; and*
3. *it is demonstrated that the site is at least as suitable for such development as Site Allocations or Areas of Search, with reference to the overall spatial strategy and site assessment methodology associated with this Plan.*

*In addition, proposals should be located at or in:*

- a. *employment areas that are existing or allocated in a Local Plan for general industry (B2) and storage and distribution (B8); or*
- b. *existing permitted waste management sites or co-located with other waste management development; or*
- c. *the same site or co-located in close proximity to where the waste arises; or*
- d. *the curtilages of Waste Water Treatment Works (in the case of biological waste); or,*
- e. *areas of Previously Developed Land; or*
- f. *redundant agricultural or forestry buildings and their curtilages (in the case of green waste and/or biological waste).*

*Proposals for energy recovery facilities with combined heat and power are expected to demonstrate that the heat produced will be supplied to a district heat network or direct to commercial or industrial users.*

*Any proposals that come forward on land use types not identified above will be assessed on their merits, based on the policies in this Plan.*

## Open Waste Facilities

**8.18** Waste management facilities that deal with waste in the open air can give rise to specific impacts such as noise and dust which can influence where such development should take place. Open waste operations include aggregate recycling facilities and open windrow composting.

**8.19** Aggregate recycling facilities are often temporary facilities and are likely to be best located on mineral extraction sites or close to the source of waste, to minimise transport distances.

**8.20** Open windrow composting facilities are likely to be suitable in more rural locations due to their similarity with other agricultural developments (e.g. farms). They can produce odours because of the biodegrading process and therefore, rural, less populated locations for these facilities are preferred. Any particular requirements for minimising potential adverse effects on residential amenity and rural character will be expected to be demonstrated through a planning application.

### Policy 6

#### Open Waste Facilities on unallocated sites or outside Areas of Search

*Proposals for new open waste management facilities will be permitted where:*

1. *the waste site allocations and the Areas of Search in this Plan are shown to be unsuitable or unavailable for the proposed development;*
2. *although not exclusively, a need for the capacity of the proposed development has been demonstrated to manage waste arising from within the administrative areas of Essex and Southend-on-Sea; and*
3. *it is demonstrated that the site is at least as suitable for such development as Site Allocations or Areas of Search, with reference to the overall spatial strategy and site assessment methodology associated with this Plan.*

*In addition, proposals should be located at or in:*

- a. *redundant farm land (in the case of green waste and/or biological waste); or*
- b. *demolition and construction sites, where the inert waste materials are to be used on the construction project on that site; or*
- c. *existing permitted waste management sites or co-located with other waste management development; or*
- d. *the curtilages of Waste Water Treatment Works (in the case of biological waste); or*
- e. *mineral and landfill sites where waste material is used in conjunction with restoration, or proposed waste operations are temporary and linked to the completion of the mineral/landfill operation; or*

- f. *areas of Previously Developed Land; or*
- g. *employment areas that are existing or allocated in a Local Plan for general industry (B2) and storage and distribution (B8).*

*Any proposals that come forward on land use types not identified above will be assessed on their merits, based on the policies in this Plan.*

## Nuclear Radioactive Waste

**8.21** Bradwell-on-Sea Nuclear Power Station is a licensed Nuclear Site and is the principal source of radioactive waste arisings within the Plan area whilst the Power Station is decommissioned.

**8.22** The nuclear waste arisings from this process comprise Very Low Level (VLLW), Low Level (LLW) and Intermediate Level (ILW) Radioactive Wastes. A key element of the decommissioning is to manage the waste arising, to enable the waste to be safely retrieved from the facility, stored and processed whilst having regard to the level of radioactivity and long term options available.

**8.23** The Bradwell-on-Sea site is one of the first UK nuclear reactor sites to be decommissioned. Within the period covered by this policy document, the site will enter into an extended period of care and maintenance prior to which the site will be secured as appropriate, and packaged ILW placed in storage within the dedicated on-site interim ILW Storage facility. The packaged ILW will remain in the store until a national Geological Disposal Facility (GDF) is available to receive the packages. This process is in accordance with DECC's UK's waste management strategy for LLW and ILW (dated 2010). Following the extended period of care and maintenance, the site will be decommissioned and remediation activities undertaken which when completed will allow the site to reach end state and enable the next planned use.

**8.24** The Government is separately pursuing its strategy (Implementing Geological Disposal: A framework for the long-term management of higher activity radioactive waste, 2014) for a long term national Geological Disposal Facility (GDF) which is scheduled to be operational by 2040. It proposes a range of activities to be taken forward between 2014 and 2016 to set the framework for the GDF site selection process. The GDF is a "Nationally Significant Infrastructure Project" (NSIP) and the future siting is still to be determined. NSIPs are a national consideration and therefore outside of the remit of the WLP.

**8.25** It is noted that although the Plan cannot rule out any type of development, it was held in the Waste Local Plan 2001 that the geology of the Plan area does not support the disposal and containment of nuclear waste and that it was therefore likely that any such facility would be located beyond the Plan area. However, evidence contained in the Radioactive Waste Management Ltd consultation on [National Geological Screening Guidance – Providing information on Geology' \(September 2015\)](#) indicates that there is not a specific type of geology to accommodate a national GDF. This is due to the number of possible design solutions to accommodate different types of geology and the respective safety issues. The location of a GDF will be addressed through a public consultation, managed by Government, to determine an appropriate strategy. Any new GDF will receive the ILW waste that is currently stored at Bradwell-on-Sea.



**8.26** The NDA was established as a Non-Departmental Public Body under the Energy Act (2004) to ensure that the UK's nuclear legacy sites are decommissioned and cleaned up safely, securely, cost-effectively and in ways that protect people and the environment. The NDA is responsible for developing nuclear decommissioning plans and implementing them through an estate-wide strategy. The Strategies are to develop a clear understanding of what is required to deliver the decommissioning agenda with a strategic focus and coherent approach to decommissioning. The third Strategy "NDA Strategy III" was published in April 2016 and takes into account best practise and new procedures as a result of decommissioning activities at Bradwell-on-Sea and other licenced sites across the UK. Proposals that are consistent with the current strategy (or its subsequent revisions) will be supported in line with Policy 7. This includes the application of the Waste Hierarchy to reduce the quantity of waste to be disposed and the beneficial reuse of material and waste to achieve the site end state and enable the next planned use.

**8.27** The Government's National Policy Statement (NPS) for Nuclear Power Generation<sup>(8)</sup> is considering the Bradwell-on-Sea site, alongside seven other sites nationally, for future nuclear energy development. If the Bradwell-on-Sea site is selected as one of the suitable sites for nuclear energy development, then there would be further arisings of ILW in the Plan area. The fate of these materials ultimately depends upon the progress of the GDF and would need to be considered in the context of future national policy.

**8.28** Given the formative status of this process any potential waste arisings cannot be planned for at this stage. Such a new nuclear power station would be considered an NSIP and therefore outside of the remit of this Plan.

## Policy 7

### Radioactive Waste Management at Bradwell-on-Sea

*Proposals for facilities for the management of nuclear radioactive Intermediate Level Waste (ILW), Low Level Waste (LLW) or Very Low Level Waste (VLLW) will be supported within the Nuclear Licensed Areas at Bradwell-on-Sea, where:*

- a. *the proposals are consistent with the national strategy for managing ILW, LLW and VLLW as well as the decommissioning plans for the Bradwell-on-Sea power station;*
- b. *the proposals are informed by the outcome of economic and environmental assessments that support and justify the management of radioactive waste at this location, and;*
- c. *the proposals would not cause any unacceptable adverse impacts to the environment, human health or local amenity.*

8 Two volumes:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/47859/2009-nps-for-nuclear-volume1.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/47859/2009-nps-for-nuclear-volume1.pdf)

and

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/47860/1943-nps-nuclear-power-annex-vol11.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/47860/1943-nps-nuclear-power-annex-vol11.pdf)

## Non-Nuclear Radioactive Waste

**8.29** In addition to radioactive waste from the nuclear industry, small volumes of Low Level Radioactive Waste (LLW) and Very Low Level Radioactive Waste (VLLW) are produced in the Plan area, principally from hospitals and universities.

**8.30** The '[UK Strategy for the management of solid low level radioactive waste from the non-nuclear industry \(2012\)](#)' (UK Strategy 2012) looks to waste planning authorities to take account of non-nuclear industry radioactive waste disposal requirements.

### Very Low Level Radioactive Waste (VLLW)

**8.31** As stated in the UK Strategy 2012, exempt low volume VLLW <sup>(9)</sup> is currently disposed to landfills and incinerators used for handling other non-radioactive waste. No special provisions need to be addressed in environmental permits, and no extra provisions need to be made by Waste Planning Authorities to allow this practice to continue.

### Low Level Radioactive Waste (LLW)

**8.32** Most disposal of LLW requires permits to be held by both the waste producer that consigns the waste and the operator of the waste management facility that receives it. Some LLW may go to landfills permitted by the Environment Agency to accept LLW for disposal, some to the national Low Level Waste Repository (LLWR) near Drigg in Cumbria, some to decontamination or recycling facilities in the UK or abroad and some to incineration facilities. Only radioactive waste from the lower spectrum of LLW can be sent to permitted landfill. The LLWR site, which generally receives waste higher in the LLW spectrum, is part of the NDA's estate and as such it is covered by both the UK LLW Strategy 2016 and the NDA's own Strategy (as referred to above). Operators within the NDA estate such as Magnox have diverted more than 85% of LLW away from the LLWR through a wide range of more environmentally sustainable options such as waste prevention, re-use and recycling.

**8.33** The UK Strategy 2012 also confirms that data has shown that the majority of non-nuclear industry wastes are of very small volume in comparison to the annual volumes of municipal waste, stating that they are very unlikely to exceed 0.1% by volume. Therefore, it is considered there is no need to make any special provisions to address the volumes of radioactive waste produced by the non-nuclear sector within Essex and Southend-on-Sea during the Plan period.

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9 Very low level waste (VLLW) is defined as either low volume VLLW or high volume VLLW. The principal difference between the two definitions is the need for controls on the total volumes of high volume VLLW being deposited at any one particular landfill or other waste management facilities. A site producing or managing less than 50m<sup>3</sup> of VLLW per year is classed as low volume VLLW and is exempt from reporting. Any landfill or incinerator in the UK may accept low volume VLLW mixed in with the other wastes. On that basis it is assumed that any landfill or incinerator could also be receiving low volume VLLW. The Government considers that the present arrangements for low volumes of exempt VLLW are satisfactory and does not expect waste planning authorities to make specific provision for the management of VLLW in their waste plans. Guidance on the scope of and exemptions from the radioactive substances legislation in the UK (2011) sets out more detail on exemptions.

**8.34** The Environment Agency does not hold any data on the volumes of non-nuclear radioactive waste arising in Essex and Southend-on-Sea and the [UK Radioactive Waste Inventory 2013](#) <sup>(10)</sup> excludes small quantities of nuclear materials with very low concentrations of radioactivity typically produced by research establishments, universities and the non-nuclear industry ('small users').

**8.35** A Government commissioned report <sup>(11)</sup> stated that this stream is likely to reduce over the Plan period, and because there was sufficient capacity nationally to treat the non-nuclear LLW arising in Essex and Southend-on-Sea <sup>(12)</sup>, there is no requirement to make further provision for non-nuclear radioactive waste facilities. However, in order for the Waste Local Plan to be able to respond to any changing circumstances, there is a requirement to set out a policy stance.

**8.36** The ongoing availability of capacity for receipt of LLW and VLLW will also be monitored during the period of the Plan. <sup>(13)</sup>

## Policy 8

### Non-Nuclear Very Low-Level and Low-Level Radioactive Waste

*Proposals for the management of non-nuclear low-level and very low-level radioactive waste will be permitted where:*

- a. a requirement to manage waste arising from within Essex and Southend-on-Sea has been identified; and*
- b. the proposed development (including landfill) has been demonstrated to be the most appropriate and acceptable development in relation to the Waste Hierarchy, and;*
- c. the proposal would not cause any unacceptable adverse impacts to the environment, human health or local amenity.*

10 Most radioactive waste produced by minor producers is not reported in the UK Inventory as it is either low volumes of LLW that can be disposed of at permitted at landfill sites, or low volume VLLW that can be disposed of with municipal, commercial and industrial wastes at landfill sites. Most LLW reported in the 2010 Inventory is consigned to the LLWR near Drigg. Production of future arisings of LLW is assumed to remain the same as current arisings, and is estimated for the UK as a whole up to 2080 (The 2010 UK Radioactive Waste Inventory Main Report Report prepared for the Department of Energy & Climate Change (DECC) and the Nuclear Decommissioning Authority (NDA) by Pöyry Energy Limited.

11 Data collection on solid low-level waste from the non-nuclear sector DECC (2008)

12 21.90m<sup>3</sup> by volume and 2,742kg by mass at 2008.

13 This would involve the monitoring of LLW capacity via reports produced by NuLEAF and others.

## Locational Criteria for Waste Disposal Facilities

**8.37** Extant guidance states that Waste Planning Authorities “*may wish to plan for a ‘close fit’ of land allocations with planned waste management capacity for landfill sites, given that landfill is at the bottom of the Waste Hierarchy*”. There is therefore a requirement for a capacity need to be demonstrated as part of any landfill application for this facility type where such proposals come forward outside of the site allocations. Proposals are required to demonstrate the capturing of landfill gas from a safety point of view and to ensure that the energy locked in waste is captured.

**8.38** With regard to inert landfills specifically, these facilities are typically required both as a way of disposing of inert waste and as a means to ensure the satisfactory restoration of existing mineral voids. The inert landfill allocations have been identified on the basis of both geographic distribution, to reflect that inert waste is normally uneconomic to transport long distances, and their restoration requirements.

**8.39** The evidence supporting the Plan indicates that there is sufficient capacity for non-hazardous landfill capacity in the Plan area.

### Policy 9

#### Waste Disposal Facilities

*Proposals for landfill facilities will be permitted where:*

1. *the landfill site allocations in this Plan are shown to be unsuitable or unavailable for the proposed development;*
2. *Although not exclusively, a need for the capacity of the proposed development has been demonstrated to manage waste arising from within the administrative areas of Essex and Southend-on-Sea;*
3. *it is demonstrated that the site is at least as suitable for such development as the landfill site allocations, with reference to the site assessment methodology associated with this Plan; and*
4. *that the proposed landfill has been demonstrated to be the most appropriate and acceptable development in relation to the Waste Hierarchy.*

*In addition, preference will be given to proposals:*

- a. *for the restoration of a preferred or reserve site in the Minerals Local Plan; or*
- b. *for an extension of time to complete the permitted restoration within the boundary of an existing landfill site.*

*Proposals for non-inert landfill are required to demonstrate the capture of landfill gas for energy generation by the most efficient means.*

*Any proposals that come forward on land use types not identified above will be assessed on their merits, based on the policies in this Plan.*

## 9 Development Management Policies

### Introduction

**9.1** Waste developments can have a detrimental impact on their surroundings if they are not properly operated and monitored, and this must be carefully considered. The impacts on the quality of life of local residents, businesses and on the environment are key considerations when deciding where to locate new waste development. A wide range of potential adverse impacts can arise and the specific nature of these impacts and the ways of addressing them will vary case by case. The planning policy framework provided by this Plan is considered flexible and robust enough to ensure that facilities can be brought forward in sustainable locations, either on those sites directly allocated or at other locations, through criteria-based policies.

**9.2** A number of the potential impacts of waste facilities are addressed by the pollution control regime regulated by the Environment Agency. The regime is concerned with preventing pollution using measures to prohibit or limit the release of substances to the environment to the lowest practicable level, which is also not harmful to the environment. It also ensures that ambient air and water quality meet standards that guard against impacts to the environment and human health. The NPPW reinforces the stance that in considering planning applications for waste management facilities, waste planning authorities should concern themselves with implementing the planning strategy in the Development Plan and not with the control of processes, which are a matter for the pollution control authorities. The NPPW states that the planning and pollution control regimes are separate but complementary, and a facility will not be permitted by the Waste Planning Authority, nor be allowed to continue to operate, if it does not conform to the pollution control regime.

**9.3** Waste Planning Authorities are instructed to manage the development and use of land for waste management in the public interest, focus on whether waste development is an acceptable use of land and work on the assumption that the relevant pollution control regime will be properly applied and enforced.

**9.4** Waste planning and pollution control authorities therefore work closely to ensure integrated and timely decisions under the complementary regimes. This can be assisted by applicants preparing and submitting planning and pollution control applications in parallel.

**9.5** New waste management facilities to meet waste capacity requirements must be located in suitable locations and seek to avoid or mitigate adverse impacts that may arise. This has been set out through national and international waste policy and these are supported by the policies, general locational criteria and site allocations/Areas of Search made within this Plan.

**9.6** It is therefore considered that, only a limited range of policies are required in the WLP to manage and control the effects of new waste management facilities within the Plan area. National guidance is clear that Local Plans do not need to repeat or reformulate existing national, regional or local policy, or duplicate the existing pollution control regime.

## The Application Process

**9.7** The Planning and Compulsory Purchase Act 2004 and Localism Act 2011 introduced major changes to the planning system, including greater public involvement throughout the planning process.

**9.8** The relevant Waste Planning Authority's Statement of Community Involvement states that pre-application discussions between the potential operator and Waste Planning Authority is good practice, and proposes that applicants with significant development proposals should carry out pre-application public consultation. This is supported within the relevant provisions of the Localism Act 2011. Pre-application discussion will also continue to be encouraged when not statutorily required. In respect of the submission of sufficient information, the applicant is directed to the adopted Local Validation List that sets out the minimum level of information that is required to accompany a planning application.

**9.9** Other supporting documents that may be required at the point of application are contained within the adopted Supplementary Guidance Note for the Requirements of a Valid Planning Application.

## Environmental Impact Assessment

**9.10** All planning applications for waste development are screened as part of the Environmental Impact Assessment (EIA) process to determine whether or not they require an Environmental Statement. This is required by EU and UK law. The sequential screening / scoping process helps to identify whether a proposal is likely to have significant environmental effects, and if so, an Environmental Statement must accompany the planning application.

**9.11** If required, the Environmental Statement would identify the likelihood of significant impacts occurring. It will show how these impacts can be avoided, mitigated and compensated for, and consider alternative ways the development could be carried out.

**9.12** In cases where an Environmental Statement is not required, the applicant must still consider all the impacts arising from the proposed waste development and supply information to demonstrate that these have been addressed within their planning application.

## Planning Conditions

**9.13** Planning conditions are always attached to planning approvals to regulate the operation of the proposed waste development. Planning conditions can only be applied when they meet certain tests (e.g. are they reasonable and enforceable) and are used to agree specific details about the proposal (such as a landscape scheme) and to ensure the effects on local people and the environment are kept within acceptable levels (for example by limiting working hours).

**9.14** Where significant adverse effects cannot be adequately controlled or prevented, or insufficient evidence has been supplied to demonstrate whether impacts can be adequately mitigated, planning permission will be refused. It is important to note that this process applies to all proposals being brought forward on preferred allocations, Areas of Search and through the locational criteria. An allocation of a site through this Plan does not equate to a planning permission, nor does it circumvent any of the statutory processes or controls that govern the granting of planning permission.

**9.15** When determining planning applications, the WPA will examine each application against all the policies of the WLP, whether or not it is proposed on a preferred site for allocation, or within an Area of Search. The major issues of climate change and transportation of waste is explored in some detail, followed by other general issues, which should be addressed in any planning application.

### General Considerations for Waste Management Proposals

**9.16** Waste management development can result in a range of potential benefits and operational impacts that need to be considered. The planning policy framework provided by this Plan is considered flexible enough to deal with a number of issues that may arise from different development, as well as take into account the local circumstances of each proposal.

**9.17** The Local Validation Lists adopted by the relevant Waste Planning Authority provides guidance about the particular information that may be required to validate a planning application before it can be determined. Advice on the information to support an application should be sought on a case-by-case basis, normally through pre-application discussions with the relevant Authority. For any proposal for waste management development that comes forward for determination, the impact of the proposal on the environment and amenity, as described below, will be carefully assessed and considered before a decision is made.

**9.18** Where the impact of the proposal is unacceptable, and such impacts can't be controlled, then planning permission could be refused. Specific measures can, however, be sometimes undertaken to mitigate any potential adverse impact to either local amenity or the environment. Such measures could include, for example, additional landscaping, sustainable drainage schemes, protection of historic assets, noise attenuation, the design of lighting (including avoidance of light pollution of the night sky), dust and vibration control, nature conservation, good building and site design and restrictions on working hours and lorry movements. The appropriate mitigation will depend on the characteristics of the proposal, the site and the surrounding area.

**9.19** Waste is part of the economy – it is a by-product of economic activity, by businesses, government and households. Waste is also an input to economic activity – whether through material or energy recovery. The management of that waste has economic implications – for productivity, government expenditure, and the environment<sup>(14)</sup>. The waste industry contributes to the economy of the Plan area as an employer and businesses require effective waste management to offset costs associated with disposing of the waste it produces. Waste management is therefore important to the economic growth of the Plan area and this needs to be taken into consideration when assessing planning applications for waste management development.

**9.20** In conjunction with the locational criteria policies, these Development Management considerations seek to ensure that any new, non-allocated, sites that come forward reflect the methodology and criteria used to select the preferred allocated sites in this Plan. This will help ensure that any new non-allocated sites perform at least as well as the allocated sites identified, whilst also offering a degree of flexibility. A summary of the methodology used to select the allocated sites is included at **D 'Appendix D - Summary of Site Identification and Assessment Methodology'**.

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14 [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69500/pb13548-economic-principles-wr110613.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69500/pb13548-economic-principles-wr110613.pdf).



## Pollution and Local Amenity Impacts

**9.21** “Local amenity impact” is usually understood to mean the effect of the proposed development on the existing visual and aural characteristics of the immediate neighbourhood, including the impact on any residential and non-residential uses in the vicinity. Impacts on amenity can cover a range of potential pollution and disturbance from, for example, light, noise, dust, and odour as well as concerns of the possible effects on human health from the development.

**9.22** Detailed controls are exercised through specific pollution prevention and control regimes primarily regulated by the Environment Agency (EA) and Local Authority Environmental Health Officers (EHOs). However, potential pollution and health impacts can be ‘material considerations’ when determining applications and an assessment of the likely environmental impacts of a proposal could be required. The Environment Agency’s ‘Guidance for development requiring planning permission and environmental permits’, states that “new development within 250m of an existing composting activity could result in people being exposed to odour and bio-aerosol emissions”. The same document states that new development within 250m of a combustion facility might, in some cases, mean people are exposed to odour, dust or noise emissions. Whilst this Guidance is aimed at the development of new sensitive receptors within proximity to waste management development, rather than new waste management development itself, it is considered appropriate to apply this buffer when locating new waste management development in proximity to existing sensitive receptors. As such, waste management facilities generating bio-aerosols or contaminants from thermal processes (e.g. pyrolysis / gasification) should not be located within 250m of sensitive receptors and proposals for waste facilities generating bio-aerosols will be expected to have regard to this separation distance. The EA and EHOs will be consulted on waste planning applications, where appropriate.

**9.23** The impact on human health is also material consideration in making planning decisions. However, national policy expects that in determining applications Waste Planning Authorities should not be concerned with “the control of processes which are a matter for the pollution control authorities. Waste planning authorities should work on the assumption that the relevant pollution control regime will be properly applied and enforced.” If permission is granted, planning conditions may be imposed to help mitigate any impact on local amenity.

## Biodiversity and Geological Conservation

**9.24** The Plan Area has a range of sites recognised for their environmental quality, a number of which have international designations. These are identified on Map 3.

**9.25** Within national planning policy, individual sites designated for their importance to biological or geological diversity at an international or national level receive statutory protection, whilst those designated at a local level gain protection through District, Borough or City Local Plans. The Plan seeks to ensure that there are no unacceptable adverse impacts on these important assets. Planning permission for waste management development within or otherwise affecting an international site (Natura 2000 site) will only be granted where the conclusions of a project-level Habitats Regulations Assessment (HRA), as required for those proposals highlighted within the HRA of the Plan, demonstrate that the proposal will have no adverse impacts on the integrity of any site, either alone or in combination with other plans or projects. Screening distances are provided below as a guide for potential applicants in relation to the triggers for project-level HRA.

**Table 5 HRA Screening distances**

Pathway	Screening distance	Relevant European Sites
Air quality - vehicle exhaust emissions	200m from European site	All sites
Air quality - Energy from Waste	10km from European site	All sites
Air quality - landfill gas flares	1km from European site	All sites
Air quality dust	500m from European site	All sites
Air quality - Biopathogens (composting facilities only)	1km from European site	Principally Epping Forest SAC
Water quality	No standard distance - use Source/Pathway/Receptor approach	All sites except Epping Forest SAC and Wormley-Hoddesdonpark Woods SAC
Disturbance (noise/visual)	1km from European site supporting disturbance sensitive species/populations	All SPAs and Ramsar sites
Gull/corvid predation (non inert landfill only)	5km from European site supporting sensitive ground-nesting breeding species (e.g. Terns)	All SPAs
Coastal squeeze	No standard distance - evaluate on case by case basis	All coastal sites

**9.26** Waste management development which impacts on Sites of Special Scientific Interest, National Nature Reserves and irreplaceable priority habitats such as ancient woodland and aged or veteran trees will only be permitted where the impact does not conflict with the wildlife or geological conservation interests of that asset. Locally designated sites form a significant and important part of the Plan Area's natural resource, often contributing to ecological connectivity and landscape linkages. Waste management development that will impact on Local Wildlife Sites Local, Geological Sites, Local Nature Reserves, other priority habitats and protected and priority species will only be permitted where it can be demonstrated that the proposal will not significantly harm the site or the benefits of the development outweigh any adverse effects and such effects can be satisfactorily mitigated or, as a last resort, compensated for, eg through offsetting. Proposals that can show a positive contribution to the restoration, creation, protection, enhancement and management of ecological networks at the landscape scale will be encouraged.

**9.27** Although protecting biodiversity is most often associated with the countryside, biodiversity occurs everywhere, including more built-up urban areas. Indeed, some unique and varied habitats have successfully been established on previously developed (or 'brownfield') land.

**9.28** Natural assets and resources cannot be easily replaced once lost, especially those that thrive in very specific conditions (whether on ‘greenfield’ or ‘brownfield’ land). Protection and enhancement of such assets may be required, however in all cases the impact should be fully understood before a decision is made that the development, in principle, is acceptable at the proposed location.

**9.29** In the case of a demonstrated overriding need for the development, any impacts would be required to be mitigated or compensated for in order to provide a net gain for wildlife proportionate to the nature and scale of the proposal. Where loss of sites, habitats and other features can be justified, appropriate compensatory measures should normally be provided. In certain circumstances, a new asset or resource should be provided which is of at least equivalent value, where possible, to an asset or resource which is lost as a result of development. This could include the creation of a new habitat within or in close proximity to the site or elsewhere if this is more appropriate. Use of the Defra Biodiversity Metric will be encouraged as a method of calculating the extent of habitats lost and created.

### **Countryside, Landscape, Townscape Character Impacts and Green Belt**

**9.30** The character of the Plan Area is important to residents and visitors alike. The visual impact experienced as a result of the development of waste management facilities on the landscape and townscape is a key consideration when deciding planning applications. It is important to protect Essex and Southend-on-Sea’s landscape and townscape for the sake of their intrinsic character and beauty.

**9.31** Most of the Plan Area is covered by Landscape Character Assessments that consider where locally designated landscapes of importance are situated. Particular features that create local distinctiveness or character should be protected from future loss; this includes features such as topography, habitats that are unique to an area, geology (e.g. unique formations or preserved quarry geology) and historic landscapes (which may contain features such as ancient hedgerows and historic field boundaries).

**9.32** The Metropolitan Green Belt is a specific land use constraint. The NPPF (and its guidance) places special importance on protection of the Green Belt. Generally waste management development in the Green Belt will be considered to be inappropriate development.

### **Recreation**

**9.33** The Public Rights of Way (PROW) network provides an important means of accessing the countryside. Where relevant, applications for waste management will be required to ensure that PROW remain usable at all times or provide satisfactory alternative routes. Alternative paths and any necessary diversions of existing paths will be required to be in place prior to the closure of the existing PROW. Restoration schemes should, in the first instance, be seen as an opportunity to enhance and upgrade PROW where possible, especially with regard to the provision of Bridleways as multi-user paths as part of any permission granted. In all cases, restoration schemes should provide for access which is at least as good as that existing before workings began. The closure of a PROW, where no alternative route is provided, will not normally be acceptable.

**9.34** Local recreation assets, including Public Open Space and other outdoor facilities such as country parks, are protected in District, Borough and City Local Plans. Waste management proposals will be expected to mitigate any unacceptable impact on such designations.

## Heritage Assets

**9.35** The historic environment contributes towards creating local distinctiveness and a sense of place by understanding our past. Heritage assets (and their setting) are an irreplaceable resource and should be conserved in a manner appropriate to their significance. Within the existing policy hierarchy, individual heritage assets designated at an international or national level receive statutory protection (under specific heritage legislation, such as Scheduled Monuments, Listed Buildings, Conservation Areas, Registered Parks and Gardens and Registered Battlefields) whilst others designated at a local level are subject to protection through District, Borough and City Local Plans.

**9.36** It is acknowledged that some assets may not yet be identified (such as archaeological remains). These may present an important resource in terms of place-making and developing an understanding of our history, which if ignored may be lost.

## Land and Soil Resources

**9.37** The presence of the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) should be taken into account, alongside other sustainability considerations, when waste management proposals affect such land. Weight will be given to protecting such land from development, although the amount of weight will depend of the development proposed and the agricultural classification of the land affected. In cases where development is temporary, it is normally expected that the land is restored to at least its previous agricultural land quality.

## Potential Hazard to Aircraft from Bird Strike (open air facilities)

**9.38** Waste management development may have an impact on the use of aviation facilities within the Plan Area if it is proposed within a 13km radius of an aerodrome. This is due to the potential for some waste facilities, especially non-hazardous landfill sites, to attract birds, as well as the potential for certain species of plants to attract birds when a landfill or landraising site is being restored. The restoration of sites at a lower level than the original landform could also attract birds if water bodies are proposed or subsequently form.

**9.39** Aerodrome safeguarding guidance is set out in the [DfT/ODPM Circular 1/2003 – ‘Advice to local planning authorities on safeguarding aerodromes and military explosives storage areas’](#). In instances where a waste proposal is within 13km of an aerodrome, the relevant aviation authority will be consulted, to ensure that the proposed development does not adversely affect aircraft safety.

## The Transport Network

**9.40** Opportunities to transport waste by more sustainable modes, such as rail and water, are encouraged wherever possible, although opportunities in the Plan area are rare due to a lack of suitable infrastructure. It is therefore recognised that waste will continue to primarily be transported by road, as this is currently the most feasible mode of transport. The possibility of using rail and water for the transportation of materials to and from the site should be investigated, proportionate to the scale and nature of the development. The use of such means of transportation should be shown to be inappropriate in terms of both practicality and viability before transportation by road is considered.

**9.41** As further highlighted in Policy 12 'Transport and Access' it is anticipated that most waste developments proposing reliance on the road network will be accompanied by a Transport Assessment. Such assessments should address the issue of road safety, including potential impact on all road users including pedestrians, cyclists, and equestrians. Any potential impact should be satisfactorily mitigated, including those on users of Public Rights of Way that may cross the site. This may require the provision of safe routes for vulnerable users. It may also be necessary to impose restrictions on the number of vehicles and the routes used, in order to mitigate against any potential impacts on local amenity.

### **Flooding, Water Resources and Water Quality**

**9.42** The risk of flooding should be minimised for people, property and the natural environment. Development can increase surface water run-off to streams and rivers, through increasing built development in the local environment. To prevent or minimise this risk, proposals should incorporate effective surface water management, such as sustainable drainage systems, where necessary to ensure flood risk is not increased.

**9.43** In general terms, waste treatment (excluding landfill or the management of hazardous waste) is defined as a 'less vulnerable' land-use in the NPPF; therefore, it may be compatible in Flood Zones 2 and 3a (subject to certain conditions). A 'sequential test', as set out in the NPPF, is applied to new developments to steer these to areas with the lowest probability of flooding.

**9.44** In 2010, Essex County Council and Southend-on-Sea Borough Council became the Lead Local Flood Authorities for the Plan Area. These authorities have responsibility for ensuring that major development proposals do not compromise the aquatic environment through the effective installation of sustainable drainage systems (SuDS). SuDS reduce the quantity and slow down the rate of surface water run-off from sites as well as assist in treating any pollutants as waters drain from the development. SuDS can also contribute greatly to improving the amenity and wildlife interest of new development through the introduction of water bodies and habitats. SuDS in new development should be in the most appropriate location, be well-designed and have a continued maintenance regime to ensure their continued effectiveness.

**9.45** As well as flood risk, the effect of waste management development on all water bodies should be addressed. This includes surface waters, ground waters, coastal waters, and the potential use of voids for floodwater storage, which has further potential land flooding implications – especially if the proposed development takes up the space that flood waters would have otherwise drained into. A further consideration could be the protection of sources of drinking water, identified via designated Source Protection Zones.

### **Layout and Design Quality**

**9.46** The layout and design of waste development can help to reduce potential impacts, create positive impacts with regard to the public perception of such activities, improve safety and security, as well as increasing operational and/or energy efficiency.

**9.47** Strategic site layout can also allow for greater opportunities to incorporate elements of visual interest, reflect local identity in the design or provide for effective buffers. Visual design elements of such developments can either seek to facilitate integration into the surrounding landscape or townscape, or create visual interest and highlight innovation.

**9.48** As part of the pre-application advice service from the relevant Waste Planning Authority, the expectation with regard to any Design and Access Statement (if applicable) will be advised.

## Cumulative Impacts

**9.49** It is also appropriate to consider the cumulative impact of any proposed waste management development especially upon amenity, the economy, the natural and built environment and the local road network. In determining an application for a new waste management facility, account will normally be taken of the potential cumulative impact of waste management and other development within the locality and in particular the area's capacity to absorb that change.

**9.50** In some instances, the combined impact of development over a sustained period of time may be sufficient to warrant refusal of planning permission.

### Policy 10

#### Development Management Criteria

*Proposals for waste management development will be permitted where it can be demonstrated that the development would not have an unacceptable impact (including cumulative impact in combination with other existing or permitted development) on:*

- a. *local amenity (including noise levels, odour, air quality, dust, litter, light pollution and vibration);*
- b. *water resources with particular regard to:*
  - *the quality of water within water bodies:*
    - *Preventing the deterioration of their existing status; or*
    - *Failure to achieve the objective of 'good status' and*
  - *the quantity of water for resource purposes within water bodies.*
- c. *the capacity of existing drainage systems;*
- d. *the best and most versatile agricultural land;*
- e. *farming, horticulture and forestry;*
- f. *aircraft safety due to the risk of bird strike and/or building height and position;*
- g. *the safety and capacity of the road and other transport networks;*
- h. *the appearance, quality and character of the landscape, countryside and visual environment and any local features that contribute to its local distinctiveness;*
- i. *the openness and purpose of the Metropolitan Green Belt;*

- j. Public Open Space, the definitive Public Rights of Way network and outdoor recreation facilities;*
- k. land stability;*
- l. the natural and geological environment (including internationally, nationally or locally designated sites and irreplaceable habitats);*
- m. the historic environment including heritage and archaeological assets and their settings; and*
- n. the character and quality of the area, in which the development is situated, through poor design.*

*Where appropriate, enhancement of the environment would be sought, including, but not exclusively, the enhancement of the Public Rights of Way network, creation of recreation opportunities and enhancement of the natural, historic and built environment and surrounding landscape.*

## Mitigating and Adapting to Climate Change

**9.51** There is a need to reduce the contribution to climate change from waste management activities, while also adapting to its potential effects.

**9.52** The Plan area is one of the driest areas in the country and there is a need to minimise demands on potable water resources, particularly in the context of climate change. Large parts of the Plan area are at risk from flooding, particularly coastal and river localities, and particularly from surface water run-off after storm events; again an issue that will be compounded by climate change. The design and siting of new development can contribute to mitigation and adaptation to climate change.

**9.53** New waste management proposals should therefore include appropriate measures to ensure mitigation and adaptation to climate change.

### Policy 11

#### Mitigating and Adapting to Climate Change

*Proposals for waste management development, through their construction and operation, are required to minimise their potential contribution to climate change by reducing greenhouse gas emissions, incorporating energy and water efficient design measures and being adaptable to future climatic conditions.*

1. *Proposals for waste management development will:*
  - a. *demonstrate how the location, design (including associated buildings) and transportation related to the development will limit greenhouse gas emissions;*
  - b. *support opportunities for decentralised and renewable or low-carbon energy supply, subject to compliance with other policies in the Development Framework;*
  - c. *demonstrate the use of sustainable drainage systems, water harvesting from impermeable surfaces and layouts that accommodate waste water recycling; and*
  - d. *incorporate proposals for sustainable travel including travel plans where appropriate.*
2. *Proposals for waste management development will only be permitted where:*
  - a. *there would not be an unacceptable risk of flooding on site or elsewhere as a result of impediment to the flow of storage or surface water, as demonstrated by a Flood Risk Assessment, where required by the National Planning Policy Framework.*
  - b. *existing and proposed flood defences are protected and there is no interference with the ability of responsible bodies to carry out flood defence works and maintenance where applicable*
  - c. *there would not be an unacceptable risk to the quantity and quality of surface and ground waters, or impediment to groundwater flow.*



3. *Proposals which are capable of directly producing energy or a fuel from waste should, where reasonably practicable, demonstrate that:*
  - a. *excess heat can be supplied locally to a district heat network or directed to commercial or industrial users of heat;*
  - b. *for anaerobic digestion proposals there is an ability to inject refined gas produced as part of the process into the gas pipeline network or to be stored for use as a fuel;*
  - c. *for advanced thermal treatment there is an ability to convert syngas for use as a fuel;*
  - d. *for Mechanical Heat Treatment or Mechanical Biological Treatment, development can supply the heat produced as part of the process to a district heating scheme;*
  - e. *for non-hazardous landfill, the landfill gas is captured for the recovery of energy by the most efficient methods and consideration has been given to the ability to connect to a district heat network or for converting recovered gas for injection to the gas pipeline network;*
  - f. *where the provision of e. (above) is not feasible or technically practicable, the development shall not preclude the future implementation of such systems.*

## Transportation of Waste

**9.54** The transportation of waste within the Plan area should be as sustainable as practicable. The impact of transporting materials to and from waste sites is one of the most important concerns to communities and every effort should be made to reduce the quantity of waste materials that have to be transported whilst minimising the distance over which they must be transported. This means locating waste management facilities close to the source of the waste. This approach is in accordance with the 'Proximity Principle', a concept derived from EU legislation, which requires waste to be treated as close to the point of its arising as practicable.

**9.55** Opportunities to transport waste by more sustainable modes, such as rail and water, are encouraged wherever possible, although such opportunities in the Plan area are rare due to a lack of suitable infrastructure. It is therefore recognised that waste will continue to primarily be transported by road, as this is currently the most feasible mode of transport. The possibility of using rail and water for the transportation of materials to and from the site should however not be discounted. The use of such means of transportation should be investigated in terms of both practicality and viability before transportation by road is considered.

**9.56** Sustainable transport is not just a matter of the distance that waste vehicles have to travel and the mode of transport utilised; the suitability of access into and out of any site and the nature of the roads that the vehicles use are also important considerations. Transport associated with waste development should be in line with the transport policies contained within the [Essex Transport Strategy \(2011\)](#), particularly Policy 6 – Freight Movement. In Southend-on-Sea, an equivalent policy can be found in the [Southend-on-Sea Local Transport Plan 3 \(2015\)](#), Policy 7 – Freight Distribution.

**9.57** Appendix D of the refreshed ECC Highways Development Management Policies document (expected in early 2016) sets out a Route Hierarchy Plan that defines the appropriate transport hierarchy applicable to the WLP. This route hierarchy is a reproduction of Appendix A of the [ECC Highways Development Management Policies 2011](#) document. Further, the 2016 Highways Development Management Policies document defines Priority 1 and Priority 2 routes for the safe and effective movement of goods. Proposals for development will be required to have regard to this policy. Southend-on-Sea has a Route Hierarchy set out in association with its LTP3. These hierarchies reduce the potential amenity impacts from HGVs and contribute towards managing safety on the highway network. Where highway and/or access works are sought, such works will be required to meet standards acceptable to the Highway Authorities as well as the Policy in this Plan.

**9.58** Sites allocated in this Plan have been subject to assessment at a strategic level, including access to the Route Hierarchy and are considered to be acceptable in principle. The Areas of Search consist exclusively of land allocated for employment uses and the locational criteria for waste facilities lend preference to appropriate previously developed locations, such as industrial estates. It is considered that the majority of industrial estates in the Plan area, including all those allocated as Areas of Search in this Plan, have satisfactory access to the Strategic and Main Distributor route network and are therefore likely to be suitable for HGVs. However, all waste management proposals will be required to show that they are acceptable in terms of their transport and highway impact, normally through either a Transport Statement or Assessment.

**9.59** Such assessments should address the achievement of safe and suitable access by all modes of transport. The impact on all road users, including pedestrians, cyclists and other users, should be acceptable or satisfactorily mitigated where appropriate. It may also be necessary to impose restrictions on the number of vehicles and as well as agree the routes

used with the Highways Authority. Where highway or access improvements are considered necessary to make the proposed development acceptable, such improvements will be required to meet the relevant standards of the Highways Authority.

**9.60** Please note that the potential impacts of waste traffic on local residential amenity and safety is further addressed in [Policy 10 'Development Management Criteria'](#).

## Policy 12

### Transport and Access

*Proposals for waste management development will be permitted where it is demonstrated that the development would not have an unacceptable impact on the efficiency and effective operation of the road network, including safety and capacity, local amenity and the environment.*

*Proposals for the transportation of waste by rail and/or water will be encouraged subject to other policies in this Plan. Where transportation by road is proposed, this will be permitted where the road network is suitable for use by Heavy Goods Vehicles or can be improved to accommodate such vehicles.*

*The following hierarchy of preference for transportation will be applied:*

- a. the transport of waste by rail or water;*
- b. where it is demonstrated that (a) above is not feasible or practicable, access will be required to a suitable existing junction with the main road network (not including secondary distributor roads, estate roads and other routes that provide local access), via a suitable section of existing road, as short as possible, without causing a detrimental impact upon the safety and efficiency of the network; or*
- c. where it is demonstrated (b) above is not feasible, direct access to the main road network involving the construction of a new access and/or junction where there is no suitable existing access point and/or junction.*
- d. Where access to the main road network in accordance with (b) and (c) above is not feasible, road access via a suitable existing road prior to gaining access onto the main road network will exceptionally be permitted, having regard to the scale of the development, the proximity of sensitive receptors, the capacity of the road and an assessment of the impact on road safety.*

## Landraising

**9.61** The Government is seeking to encourage the ‘recovery’ of waste, including its use in construction. The Waste Framework Directive defines recovery as:

*“any operation the principal result of which is waste serving a useful purpose by replacing other materials which would have otherwise been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or wider economy.”*

**9.62** The overriding objective is to ensure that waste recovery and disposal are carried out so as to prevent harm to human health or pollution of the environment in accordance with the Waste Framework Directive.

**9.63** This definition is sometimes referred to as the ‘substitution’ principle because in waste recovery operations waste is used as a substitute for a non-waste raw material that would otherwise be used, thereby conserving natural resources. Activities that do not include the re-use and recycling of waste is normally considered as waste disposal.

**9.64** Landraising, to raise the ground levels of a site, will be only supported in the Plan area if the development provides a significant benefit that would outweigh any adverse impact caused. Landraising, above the level considered necessary to achieve a beneficial use or land restoration, is not acceptable.

**9.65** The Waste Planning Authorities will consider whether the proposed landraising development is needed for the purpose of ‘recovery’ (associated with a genuine use in construction), engineering or is for the ‘disposal’ of waste on land for any other reason.

**9.66** Landraising activities can be district or county matters. The test of whether such a development should be determined by a district or county authority depends on whether the proposal constitutes a ‘waste disposal activity’ or is a genuine engineering operation (operational development). Landraising will be considered as an engineering project if it is to achieve a particular development (for example coastal defence works or engineering works for highways provision). Essex County Council are required to deal with proposals for waste disposal, as Waste Planning Authority, and the relevant District/Borough/City Council with engineering/recovery proposals as Local Planning Authority. Southend-on-Sea has complete responsibility as a Unitary Authority.

**9.67** A judgement would normally have to be made as to whether the predominant purpose of the development (or substantial element) involves either waste disposal (for its own sake) or engineering. The quantity/volume of materials which are proposed to be imported and deposited (often identified from the proposed contour/level drawings) would provide an indication of the scale of that development.

**9.68** Large scale landraising, as opposed to infilling with inert waste for mineral site restoration purposes, does not generally take place if the material used to construct the proposal is not waste. Therefore, it is considered that such development is unlikely to constitute a recovery operation.

**9.69** Large scale landraising projects could divert inert waste materials from other sites, such as quarries that require such material for restoration, as well as having the potential to cause significant environmental impacts. Any application would therefore need to demonstrate the

amount of material imported and deposited would be the minimum necessary to bring about any perceived improvement or benefit and not cause an unreasonable delay in the restoration of mineral sites.

**9.70** The provisions of this policy are not intended to apply to proposals seeking to achieve post-settlement contouring to existing ground levels associated with landfill operations.

## Policy 13

### Landraising

*Proposals for landraising with waste will only be permitted where it is demonstrated that there are no feasible or practicable alternative means to achieve the proposed development.*

*Proposals will also demonstrate that:*

- a. there is a proven significant benefit that outweighs any harm caused by the proposal;*
- b. the amount of waste materials used to raise the level of the land is the minimum amount of material necessary and is essential for the restoration of the site; and*
- c. in the case of land remediation and other projects, will provide a significant improvement to damaged or degraded land and/or provide a greater environmental or agricultural value than the previous land use.*

*Proposals for landraising that are considered to constitute a waste disposal activity, for its own sake, will not be permitted.*

## Landfill mining and Reclamation

**9.71** Historically the options for waste management were limited to what would be called ‘final disposal’ today with little or no recycling or re-use of base materials. Over time, uncontrolled landfilling has been phased out, and more stringent regulatory requirements were imposed to ensure the environment and human health impacts were effectively managed. Landfill is now recognised as the least preferred form of waste management through the waste hierarchy and legislative drivers such as the incrementally increasing Landfill Tax are acting to reduce the viability of landfilling as a means of managing waste. However, the Plan area has a legacy associated with historic landfilling operations, with almost 400 historic landfills of various types located across Essex.

**9.72** As resources become scarcer, the value in previously disposed wastes is being increasingly recognised. With the notion of the circular economy gaining momentum, attention is turning towards the potential resource and energy value that could be recovered through extracting material from historic landfills, through a process known as Landfill Mining and Reclamation.

**9.73** At present, landfill mining schemes are little more than trials, as it is not yet considered to be cost effective at a significant scale<sup>(15)</sup>. In 2012, Zero Waste Scotland, commissioned Ricardo-AEA, to undertake a Scoping Study ‘[Feasibility and Viability of Landfill Mining and Reclamation in Scotland](#)’. This identified more barriers than drivers for this process at present, although this may change towards the latter parts of this Plan period. In order for the Waste Local Plan to be able to respond to any technological advancement in landfill mining, there is a requirement to set out a policy stance.

**9.74** Landfill mining and reclamation may be required in the Plan area for reasons not linked to purely economic concerns. Examples could include where the historic landfill site suffers from poor engineering, or if it is currently the cause of significant pollution, environmental or health impacts which justifies its re-opening.

**9.75** However, the mining of waste often causes environmental disturbance and any proposal will need to demonstrate mitigation of any impact on the local environment and amenity in accordance with other policies in this Plan. Further, landfills are normally a temporary use of land, which is subsequently returned to its former, or an alternative use, such as agriculture, biodiversity or improvements to local amenity.

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15 The only significant landfill mining project in Europe is projected to commence in 2017 (following the acquisition of relevant permits, expected 2015) at the Remo Milieubeheer landfill in Belgium. This would look to recover materials for recycling and to capture and generate 75 MW to 100 MW of electricity from the residual waste by way of gasification technology developed by a company based in the UK.

## Policy 14

### Landfill Mining and Reclamation

*Proposals for the mining of landfill sites will be permitted where:*

- a. the site (without intervention) is demonstrated to be endangering or has the potential to endanger human health or harm the environment;*
- b. removal is required to facilitate major infrastructure projects and it is demonstrated that there are no other locations which are suitable for the infrastructure; and/or*
- c. the waste is demonstrated as suitable for recovery and/or the waste will be captured for fuel/energy as part of the mining operation.*

*Proposals will be considered in terms of their impact on the restored use, and whether there would be an unacceptable impact on any development which has taken place since the closure of the old landfill. Proposals should not cause unacceptable adverse impact on the local environment and amenity.*

## 10 Implementation, monitoring and review

**10.1** The Policies and Site Specific allocations included in the Plan will mainly be implemented through the development management function of the Authorities. However, some of the policies will be implemented through on-going dialogue with the District, Borough and City councils within the Plan area, which takes place through established work practises.

**10.2** Implementation of the Waste Local Plan will be monitored and captured in the Authorities' Annual Monitoring Reports, unless otherwise indicated. If the monitoring identifies any significant divergence from a trend or target required, some intervention by the Authorities will be required. The targets and trigger points for further consideration/action are set out in the tables below. Monitoring will seek to establish the reason(s) for the divergence from the target and, as a consequence, an intervention may be required. Intervention could include a review of the evidence base, a specific policy, or the Plan as whole and will be reported in the Annual Monitoring Report.



Table 6 Monitoring Framework

Indicator	Related Policy / strategic objective	Target	Data source	Trigger level(s)
1 Amount of waste arisings, split by waste stream, in the Plan area	Strategic Objectives: 1, 2 & 5 Policy 1	The adopted national targets as specified in the National Waste Management Plan for England (2013) as based on the WFD:  Waste arisings in line with forecasts from evidence base	Waste Disposal Authority Environment Agency - Waste Data Interrogator	Waste arisings not in line with waste forecasts. Failure to achieve a national target.
2 Net amount of waste imported/exported per annum	Strategic Objective(s): 4 Policy: 1	Net self-sufficiency, where practicable, by 2032	Environment Agency - Waste Data Interrogator	Waste capacity in the Plan area increases/decreases in comparison with waste arising for each relevant waste stream.
3 Net amount of waste accepted from London	Strategic Objectives: 4 Policy: 1	Zero net importation of waste from Greater London by 2026 (excluding excavation waste)	Environment Agency - Waste Data Interrogator	Importation of waste increases beyond levels included in capacity forecasts and set out within the London Plan.

Indicator	Related Policy / strategic objective	Target	Data source	Trigger level(s)
<p>4</p> <p>a. Transfer, recycling and treatment capacity (tonnes)</p> <p>b. Number of safeguarded waste sites redeveloped for other uses (contrary to advice from WPA)</p>	<p>Strategic Objectives: 1, 3, 4, 7 &amp; 8.</p> <p>Policy: 1 and 2</p>	<p>No net loss of capacity (tonnes)</p> <p>Zero waste sites lost, contrary to advice</p>	<p>ECC and Local Planning Authorities</p>	<p>A loss of capacity occurs, with less waste being processed at facilities.</p> <p>A significant number of safeguarded sites are redeveloped for other uses, contrary to advice.</p> <p>Waste sites lost to competing land uses, resulting in inadequate provision of management capacity across the County.</p>
<p>5</p> <p>a. Number of new waste facilities delivered in accordance with site allocations;</p> <p>b. Number of facilities delivered on unallocated sites.</p>	<p>Strategic Objectives: 3 &amp; 4</p> <p>Policy: 2, 5, 6, 7, 8 &amp; 9</p>	<p>Permissions granted in accordance with site allocations</p>	<p>Planning Applications and Decisions</p>	<p>Site allocations not coming forward for development and a significant number of non allocated sites are developed.</p>
<p>6</p> <p>a. Number of new waste facilities delivered in accordance with Areas of Search designations</p> <p>b. Number of waste facilities delivered on</p>	<p>Strategic Objectives: 3 &amp; 4</p> <p>Policy: 2, 5, 6, 7, 8 &amp; 9</p>	<p>Permissions granted in accordance with Area of Search designations.</p>	<p>Planning Applications and Decisions</p>	<p>Waste development on Areas of Search not coming forward for development.</p> <p>A significant number of non designated industrial areas are developed.</p>

Indicator	Related Policy / strategic objective	Target	Data source	Trigger level(s)
<p>non-designated industrial land</p> <p>c. Area of land within Areas of Search permitted for non B2/B8 development</p>				Any loss of land designated as an Area of Search.
7	Strategic Objectives: 6 Policy: 10, 11	None	Planning Applications and Decisions	A significant proportion of waste developments are permitted against statutory advice.
8	Strategic Objectives: 3 Policy: 1, 2 & 6	None	Planning Applications and Decisions	A significant number of proposals for waste water treatment capacity are permitted beyond existing Waste Water Treatment Work sites- signalling a possible increase in demand for capacity.
9	Strategic Objectives: 8 Policy: 13	Zero		A significant number of proposals for landraising are granted, signalling a possible increased demand for inert waste disposal capacity in the Plan area.

## Appendices

## Appendix A - Policy Context

## A Appendix A - Policy Context

**A.1** The WLP is predicated on the requirements of European, national and local strategies and policies. The range of key strategies and policies that are relevant to the Plan are summarised below.

**A.2** Of particular relevance are the targets for recycling, recovery and diversion of waste from landfill contained in European legislation, which are summarised below. All available targets have been used to calculate the capacity requirements for the Plan area (as summarised in 'The Waste Challenge - At a Glance').

### INTERNATIONAL POLICY AND STRATEGY

#### The revised Waste Framework Directive

**A.3** The revised Waste Framework Directive (2008/98/EC) came into force in 2010, bringing together all extant EU legislation on waste at that time. The 'waste hierarchy' is the key principle of the Directive and is embodied in the WLP. Picture 3 illustrates this principle, which prioritises waste prevention re-use and recycling (including composting) before other types of recovery and finally with disposal. The aim is for the majority of waste to be prevented and re-used, with the least amount of residual waste being sent to landfill.

**A.5** The waste hierarchy is a sequential order of preference for different approaches to waste management, within which prevention of waste arisings is the first priority, through using resources and raw materials efficiently (for example, reducing the packaging on products). After waste prevention the next approach in the hierarchy is to make best use of waste (i.e. re-using a product for the same or different use, such as clothing, books and furniture), followed by recovering materials in order to reduce the volume of residual waste. Materials recovery can take the form of recycling materials such as paper, glass and plastic into new products, or more intensive treatment processes to recover materials value from the waste. The waste hierarchy then identifies a need for energy recovery (i.e. using residual waste as a fuel) to further reduce the amount of waste requiring disposal. Although there will always be a need disposal of some residual waste this should be minimised as much as practical.

**A.6** The hierarchy also confirms that planning authorities should recognise the particular locational needs of some types of waste management facilities in preparing local plans, but waste planning authorities should work in collaboration with other authorities to identify, in the first case, suitable sites and areas outside the green belt for waste management.

**A.7** Essex and Southend-on-Sea already follow the principles of the waste hierarchy through the Waste Local Plan (2001) and this is carried through into this Plan.

**Picture 3 Waste Hierarchy**



**A.8** The Waste Framework Directive 2008 further requires Member States to draw up one or more waste management plans that cover its entire geographical area. The Government has made it clear that local waste plans are needed as part of the implementation of this Directive. There is a potential risk that in the event of non-compliance a Member state, such as the UK, could be fined by the EU and in theory such an infraction could be re-directed to the Local Planning Authorities responsible for the infringement.

**A.9** The revised Waste Framework Directive contains the following recycling and recovery targets, which have been adopted by the UK government and provide a framework for the WLP:

- By 2020 to recycle 50% of waste from households, (this includes composting and reuse of waste); and
- By 2020 to recover at least 70% of construction and demolition waste.

### **EU Landfill Directive**

**A.10** The EU Landfill Directive 99/31/EC aims to prevent or reduce as far as possible negative effects on the environment from the landfilling of waste, by introducing stringent technical requirements for waste and landfill facilities and through setting targets for the reduction of biodegradable municipal waste going to landfill. This is implemented in the UK through the Waste and Emissions Trading Act 2003. European Directives such as the EU Landfill Directive will continue to influence the management and disposal of waste in the Plan area and the country as a whole whilst the United Kingdom remains a Member State of the European Union.

## **NATIONAL POLICY AND STRATEGY**

**A.11** There have been significant changes in National Policy with regards to waste planning, following the Conservative Government's 'red tape challenge' to reduce the complexity of the planning system. The key national policy documents are summarised below.

### **National Planning Policy Framework (NPPF) and National Planning Policy for Waste (NPPW)**

**A.12** The NPPF was adopted in March 2012, which reinforced sustainability focus on economic, environmental and social impacts. It focuses on preventing planning regulations from unreasonably stifling the local and national economy. The NPPF combined and streamlined all planning policy except for waste, which is contained within the NPPW.

**A.13** The NPPW provides the context around how local authorities are expected to manage the waste arising in the Plan area. This requires all local authorities to carry out certain activities including estimation of existing waste capacity and forecasting waste needs for the duration of the Plan period to ensure that sufficient facilities can be provided to sustainably manage the waste that arises. To undertake this task certain assumptions have to be made, where the relevant raw data is not available. The Waste Planning Authorities have planned future provision under a scenario which includes waste capacity that is either already operational, or currently under construction, as described in the ECC (2015) Non-Technical Capacity Summary.

**A.14** The NPPW further sets out detailed waste planning policies, effectively transposing the European Waste Framework Directive into national policy. The NPPW emphasises the need to minimise the amount of waste arising and to treat that waste created as a resource that can be recycled or reused where possible.

**A.15** The NPPW also sets out the considerations that waste authorities should apply when determining waste planning applications and during the planning policy development process. These include considering likely impacts on the local environment and amenity, taking advice from health bodies and ensuring the delivery of well-designed facilities that contribute positively to the character and quality of the Plan area. The NPPW supports the use of waste as a replacement for other materials that would otherwise have been used, i.e. recovering both material and energy value from the waste. A Zero Waste society is one where waste is managed at the top end of the waste hierarchy, with disposal being the option of last resort. In this way, waste should be seen as a resource rather than a burden. Indeed, sustainable waste management practises present significant opportunities, particularly for the economy (through reducing the use of primary resources and energy costs) and socially (through job creation and providing more pleasant environments to live). Sustainable waste management protects the environment from the unnecessary depletion of raw materials and help to mitigate against environmental impacts such as climate change and flooding.

**A.16** Further, the NPPW also provides guidance on the following:

- Ensuring that waste management is considered alongside other spatial planning concerns, and particularly ensuring that the design of non-waste development complements sustainable waste management;
- Identifying land for waste management facilities to meet waste management needs; and
- Identifying suitable sites and areas, taking into consideration opportunities for on-site management of waste where it occurs and a broad range of locations including industrial sites (including opportunities for the co-location of facilities).

## **NATIONAL POLICY STATEMENTS**

**A.17** National Policy Statements provide the basis for decisions on applications for Nationally Significant Infrastructure Projects (NSIPs). The following National Policy Statements set the policy framework for the WLP:

### **EN-1 Overarching National Policy Statement for Energy**

**A.18** The statement sets out how the energy sector can help to deliver the Government's climate change objectives and contribute to a diverse and affordable energy supply for the UK. It covers Government policy on energy and energy infrastructure development, the need for new national significant energy infrastructure projects, the assessment principles for deciding applications and how impacts from new energy infrastructure should be considered in applications.



## EN-3 National Policy Statement for Renewable Energy Infrastructure

**A.19** The statement sets out that electricity generation from renewable sources of energy is an important element in the Government's development of a low-carbon economy. Energy from waste is part of the renewable energy infrastructure of the Country, energy derived from the biodegradable fraction of waste is an important part of meeting the UK's renewable energy needs

### National Waste Management Plan for England

**A.20** The 2013 National Waste Management Plan for England (NWMPE) is the overarching National Plan for waste management and it provides an analysis on waste management in England, bringing current and planned waste management policies together in one place. NWMPE has not reviewed the existing targets which were set out in the Waste Strategy for England (2007) or presented targets beyond 2020.

### Anaerobic Digestion (AD) Strategy

**A.21** The Government published an Anaerobic Digestion Strategy and Action Plan for England (2011) which commits to substantially increasing energy from waste through AD. The document states that the main way this can be achieved is by breaking down the barriers and unnecessary obstacles faced by this technology, which is already well established in Europe. These barriers include a lack of knowledge, lack of market for the end product and an absence of financial incentives. The third and final annual report on the anaerobic digestion strategy and action plan 2011 was published in February 2015. This report also indicates where work should continue over the next few years.

## LOCAL POLICY & STRATEGY

### Municipal Waste Management Strategies

**A.22** Municipal Waste Management Strategies set out how household waste is to be managed over the period of the respective strategy. They set out targets for waste reduction and the technologies that will be used, based on the Best Practicable Environmental Option. Costs are presented alongside strategies for partnership working with both industry and local communities.

**A.23** The Municipal Waste Management Strategy for Essex (2007-2032) was developed by the 13 waste authorities of Essex, comprising Essex County Council as the Waste Disposal Authority (WDA) and the 12 district and borough councils as the Waste Collection Authorities (WCA). The Municipal Waste Management Strategy of Southend-on-Sea Borough Council runs from 2004-2020. The key objectives of the two strategies are broadly similar and include encouraging waste minimisation, increasing recycling of household waste, favouring composting technologies such as anaerobic digestion (AD) for source segregated organic wastes and exploring innovative solutions for dealing with residual waste (including Mechanical Biological Treatment). The WLP provides the spatial dimension for these objectives through the safeguarding of existing facilities considered necessary to support the achievement of the Municipal Waste Management Strategies. The Essex Waste Partnership, which includes both the Waste Disposal Authorities of ECC and Southend-on-Sea BC, and the 12 Essex Waste Collection Authorities, was set up to deliver the Essex and Southend-on-Sea Municipal Waste Management Strategy by a number of joint working initiatives. Further information can be found on the [ECC Website](#).

## Essex Minerals Local Plan (2014)

**A.24** The adopted Minerals Local Plan (2014) has linkages to waste but the approach was taken to de-couple the historically close relationship between mineral extraction and landfill sites in accordance with national policy to increase the recycling and re-use of aggregates from construction and demolition waste and the diversion away from landfill. There remains a requirement for additional inert landfill capacity and site allocations have been included to address this shortfall, providing an appropriate capacity consistent with the waste hierarchy.

## Neighbouring Waste Planning Authorities' Plans

**A.25** The waste authorities bordering Essex and Southend-on-Sea's (Hertfordshire, Cambridgeshire, Suffolk, Kent, Thurrock, and several North and East London Boroughs) and the policies in their local waste planning documents will have an influence on waste planning in the Plan area. Historically, London and Kent (and to a lesser extent Hertfordshire) have exported significant volumes of waste to Essex for disposal to landfill. In common with this WLP, these authorities' plans recognise that cross-boundary movements of waste are likely to continue, but generally they are aiming towards net self-sufficiency, where practicable, and plan for a reduced import of residual waste from London.

## Other Local Plans in Essex and Southend-on-Sea

**A.26** The districts, boroughs and city Councils in Essex and Southend-on-Sea are at various stages of Local Plan preparation. A number of these authorities have adopted Local Plans consistent with the NPPF, whilst others are still in the process of preparing or updating future iterations of their Local Plans. The WLP sits alongside these Local Plans and form part of the Development Plan for each Authority. As a strategic plan, the WLP provides the overarching spatial strategy for waste for Essex and Southend-on-Sea, and sets out a consistent strategic planning framework to enable the provision of adequate waste facilities, as well as identifying sites for the development of residual waste management facilities as part of the provision of wider development aspirations contained in each Local Plan.

## The Essex Transport Strategy (2011)

**A.27** The Essex Transport Strategy (2011) seeks to achieve five broad outcomes that have been developed in parallel with those being sought from the Council's Highways Strategic Transformation (HST) programme. It has an overall vision to achieve a transport system that supports sustainable economic growth and helps deliver the best quality of life for the residents of Essex. The WLP is consistent with the requirement of the Transport Strategy.

## The Southend-on-Sea's Local Transport Plan (2015)

**A.28** Southend-on-Sea's Local Transport Plan's four key themes include:

- ensuring a thriving and sustainable local economy within Southend-on-Sea minimising environmental impact and promoting sustainability.
- improving safety within the borough, and
- reduce existing inequality in health and wellbeing.

**A.29** The WLP will contribute to the achievement of these aims.

## Dedham Vale AONB and River Stour

**A.30** The Dedham Vale AONB and River Stour Joint Advisory Committee and partnership adopted the Dedham Vale AONB and River Stour Management Plan in 2010. The Management Plan seeks to coordinate the management of the AONB and Stour Valley and to bring together individuals and representatives of all those organisations that have an interest in the area, to maintain and enhance its natural beauty. The Management Plan is a material consideration and, as such, the WLP is consistent with the aims and objectives of the Management Plan.

## Local Enterprise Partnership (LEP)

**A.31** The South East Local Enterprise Partnership, which covers East Sussex, Essex, Kent, Medway, Southend-on-Sea and Thurrock, was approved by the Coalition Government in November 2010. The LEP is a strategic body which focuses its efforts on areas of economic importance which cross administrative borders, where there is added value in working together. The single goal for the LEP is to promote steady, sustained economic growth over the next two decades. In order to support the joint business and public sector overarching goal, the LEP Board has agreed four strategic objectives:

- Secure the growth of the Thames Gateway;
- Promote investment in our coastal communities;
- Strengthen our rural economy; and
- Strengthen the competitive advantage of strategic growth locations.

**A.32** The WLP contributes to the achievement of the objectives by enabling waste to be sustainably managed. The production of waste and its management is a business cost. Providing the right facilities in the right locations will reduce some of this financial burden, making Essex businesses more competitive.

**A.33** Please note that it is not considered appropriate to include policies in this Plan which guiding non-waste development in respect of waste management considerations, particularly as this is set out in national planning policy. Instead, the Authorities will continue to work with district and borough Councils to support the preparation and implementation of their Local Plans. Due to the increasing importance of integrating waste management into other developments, particularly for waste minimisation purposes, the Authorities will consider the preparation of guidance to support district and borough planning processes.

## Appendix B - Allocated Sites: Development Principles

## **B Appendix B - Allocated Sites: Development Principles**

All sites outlined below are allocated in accordance with Strategic Site Allocations.

**Table 7 Basildon Water Recycling Centre**

<b>District</b>	Basildon
<b>Area</b>	1.73ha
<b>Indicative Facility Scale</b>	25,000tpa
<b>Link to Waste and Mineral Activities</b>	Adjacent to existing water treatment works. Planning permission for sewage treatment works in 1994 (ESX/43/93/BAS)
<b>Site Allocation For</b>	Biological Waste Management Capacity
<b>Access</b>	Courtauld Road
<b>Estimated Availability</b>	Up to 5 years
<b>Life</b>	Permanent

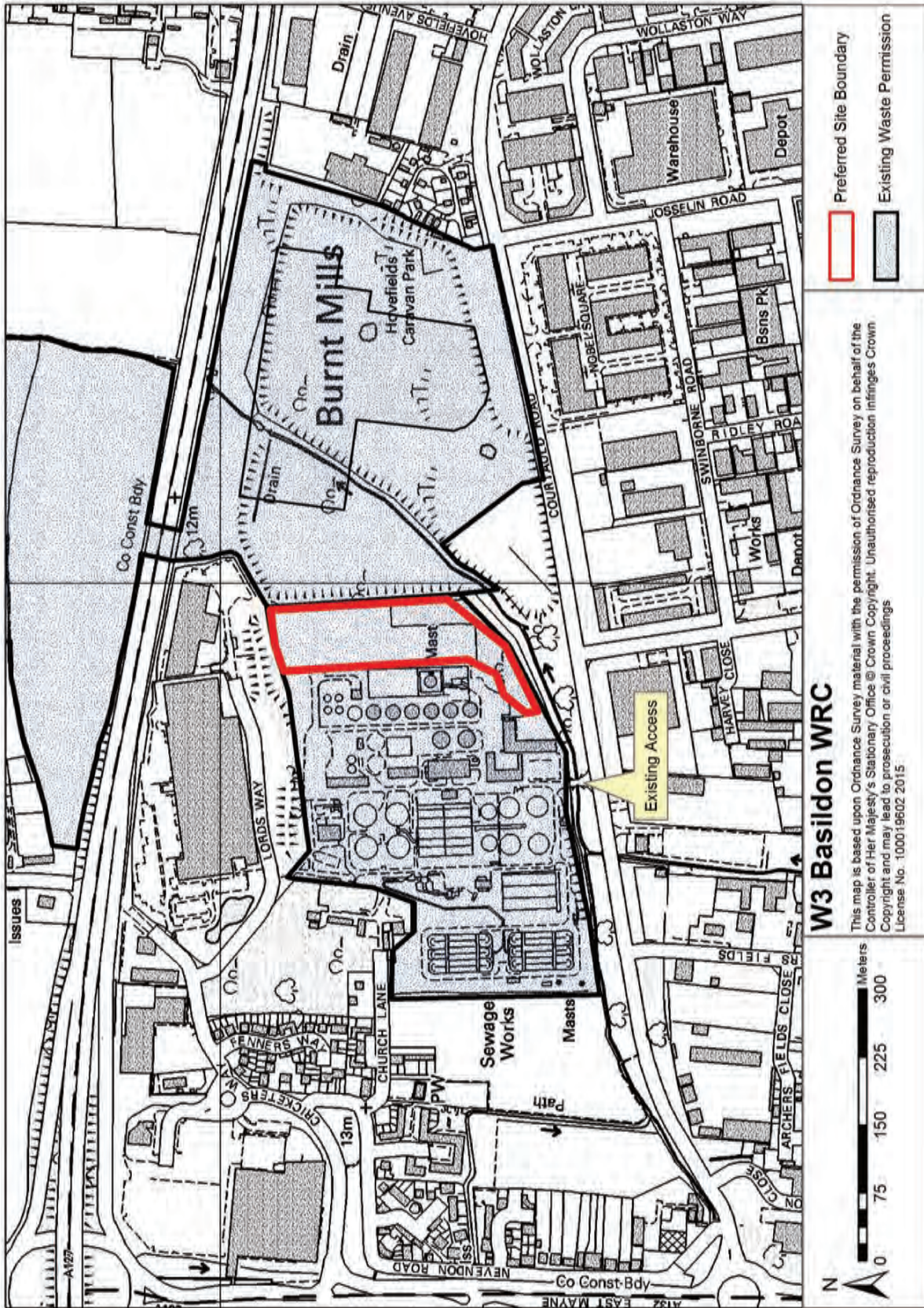
This site comprising brown-field land adjoins the existing waste water treatment works. To the east is the Tovi Eco Park IWMF. The following specific issues and opportunities are to be addressed:

- Confirmation needed how internal access to Courtauld Road would work.
- Address any potential impact of the proposal on badgers in the locality.
- To demonstrate that there would not be an adverse effect on a European site through HRA.
- Due to the important nature of the archaeological deposits to the north of the A127 a programme of trial trenching will be required to assess for prehistoric or later occupation extending onto this site. Depending on the results of the evaluation work there is the potential for open area excavation in advance of development.
- Remediation of any contaminated soils should accompany any proposal.
- Flood risk to be re-assessed due to re-alignment of Nevendon Bushes Brook as part of the permission for the Tovi Eco Park IWMF.

Notes:

- Any potential odour issues will be addressed by the Environment Agency in the interests of protecting local amenity.

Map 7 W3 Basildon WRC



**Table 8 Bellhouse Landfill Site**

<b>District</b>	Colchester
<b>Area</b>	53.82ha
<b>Indicative Facility Scale</b>	75,000tpa - Biological Treatment Facility 250,000tpa - Inert Landfill
<b>Link to Waste and Minerals Activities</b>	ESS/07/01/COL/REV Landfill cessation by 31/03/2022
<b>Site Allocation For</b>	Biological Waste Management Capacity Inert Landfill Capacity
<b>Access</b>	Warren Lane
<b>Estimated Availability</b>	Upon adoption (2017)
<b>Life</b>	Throughout life of the Plan

This site encompasses an existing landfill, concrete batching plant, coated stone plant and operators offices. The following specific issues and opportunities are to be addressed:

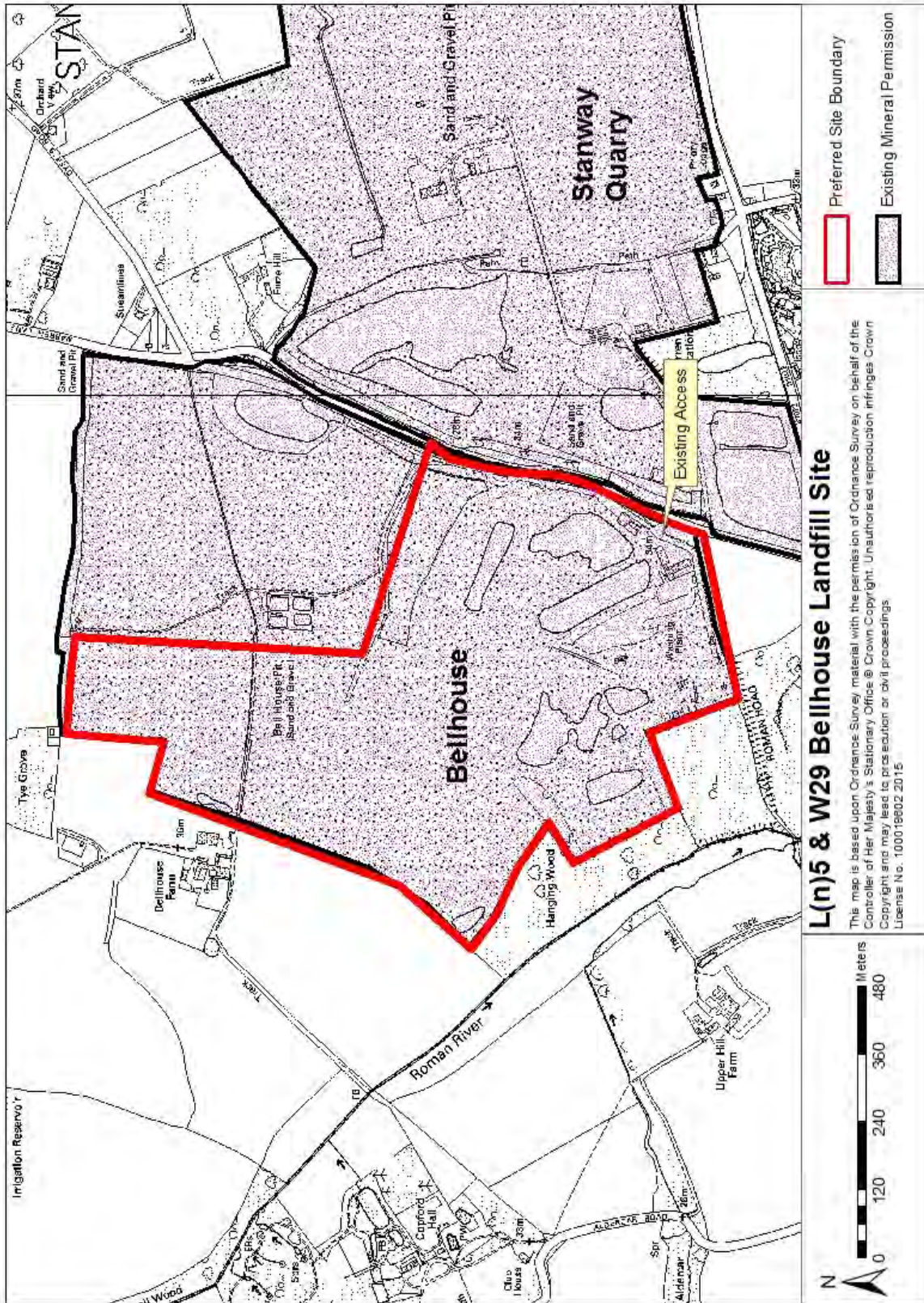
- The exact location within the site is important from a visual perspective. The area to the north east of the site would, for instance, be inappropriate due to the relatively high elevation.
- An appropriate buffer of at least 15m would be provided around CO5 8 Gol Grove and Hanging Wood Local Wildlife Sites and the Roman River. Any new scheme will need to be consistent with the approved restoration scheme for the existing landfill site.
- That the biological treatment proposal demonstrate there would not be an adverse effect on a European site through HRA.
- The visual and noise impacts from the proposal need to be addressed on the setting and significance of the listed buildings near the site to the west at Bellhouse Farm and Upper Hill Farm and to the south at Heckfordbridge.
- Limits on duration (hours of operation) and noise standards (from noise sensitive properties including Bellhouse Farm) would be required in the interests of protecting local amenity.
- The siting of a waste management facility should not prejudice the restoration of the site as approved.

Notes:

- Any potential odour issues will be addressed by the Environment Agency in the interests of protecting local amenity.



Map 8 L(n)5 and W29 Bellhouse Landfill Site



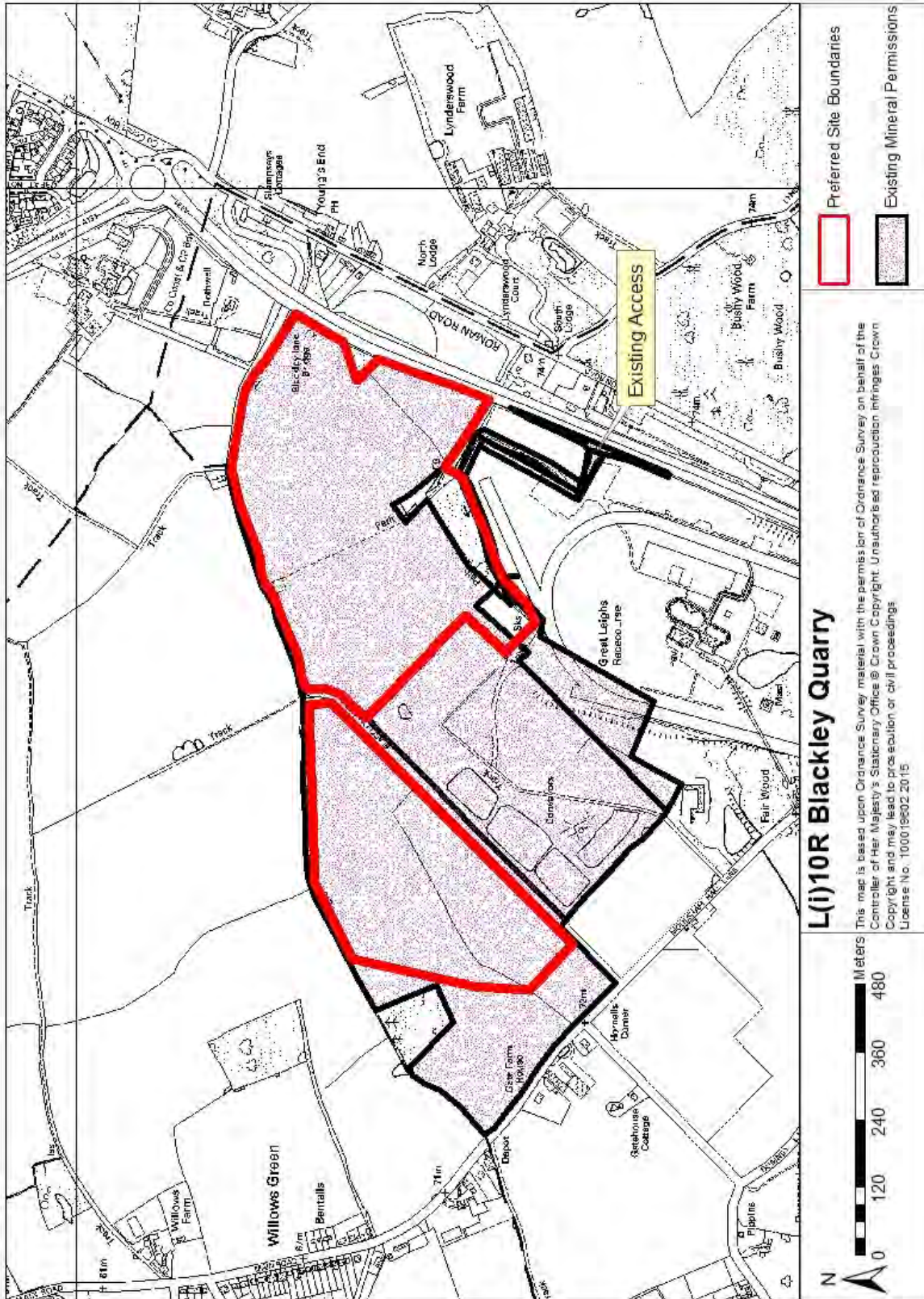
**Table 9 Blackley Quarry, Gt Leighs**

<b>District</b>	Chelmsford
<b>Area</b>	35.12ha
<b>Indicative Facility Scale</b>	75,000tpa - Inert Waste Recycling 1,400,000m <sup>3</sup> - Inert Landfill
<b>Link to Waste and Mineral Activities</b>	Site is allocated for extraction within the MLP 2014. ESS/48/08/CHL granted planning permission for extraction of sand and gravel and inert landfill (2011) on the adjacent site. Planning application ESS/16/15/CHL submitted for mineral extraction, inert landfilling and inert recycling is awaiting determination.
<b>Site Allocation For</b>	Inert Waste Recycling Inert Landfill Capacity
<b>Access</b>	Direct access onto A131 via existing Blackley Quarry
<b>Estimated Availability</b>	Up to 5 years
<b>Life</b>	20-25 years

This site would be an extension to the existing mineral and inert landfill site at Blackley Quarry. The following specific issues and opportunities are to be addressed:

- This site would be an extension to the existing site at Blackley Quarry and would make use of an internal haul road route to the junction on the A131.
- Gaps in existing hedgerows along Blackley Lane should be filled in, a belt of trees planted along Moulsham Hall Lane and gaps in the boundary planting with A131 infilled.
- Inert waste recycling should be located below natural ground levels in north-east segment of site south of Blackley Lane rather than the south-west segment north of Blackley Lane.
- Dust mitigation measures, limits on duration (hours of operation) and noise standards (from noise sensitive properties) will be established in the interests of protecting local amenity.
- The aggregate recycling operation should be tied to the life of inert landfilling and hence be able to be removed at the cessation of landfilling operations.
- Those areas of archaeological deposits preserved in-situ from the extraction phase shall be included as part of any restoration scheme.
- The impacts from the proposal need to be addressed on the designated heritage assets on the edge of the application site. This should inform a proposed scheme of mitigation to alleviate the harm to the setting of the listed buildings especially along Moulsham Hall Lane.
- Careful consideration must be given to the final restoration contours to ensure the final landform blends with the surrounding topography and the restoration would be predominantly back to agricultural use.

Map 9 L(i)10R - Blackley Quarry, Gt Leighs



**Table 10 Courtauld Road, Basildon**

<b>District</b>	Basildon
<b>Area</b>	5.05ha
<b>Indicative Facility Scale</b>	34,000tpa
<b>Link to Waste and Mineral Activities</b>	ESS/22/12/BAS granted planning permission for integrated waste management facility
<b>Site Allocation For</b>	Biological Waste Management Capacity
<b>Access</b>	Courtauld Road
<b>Estimated Availability</b>	Up to 5 years
<b>Life</b>	Permanent

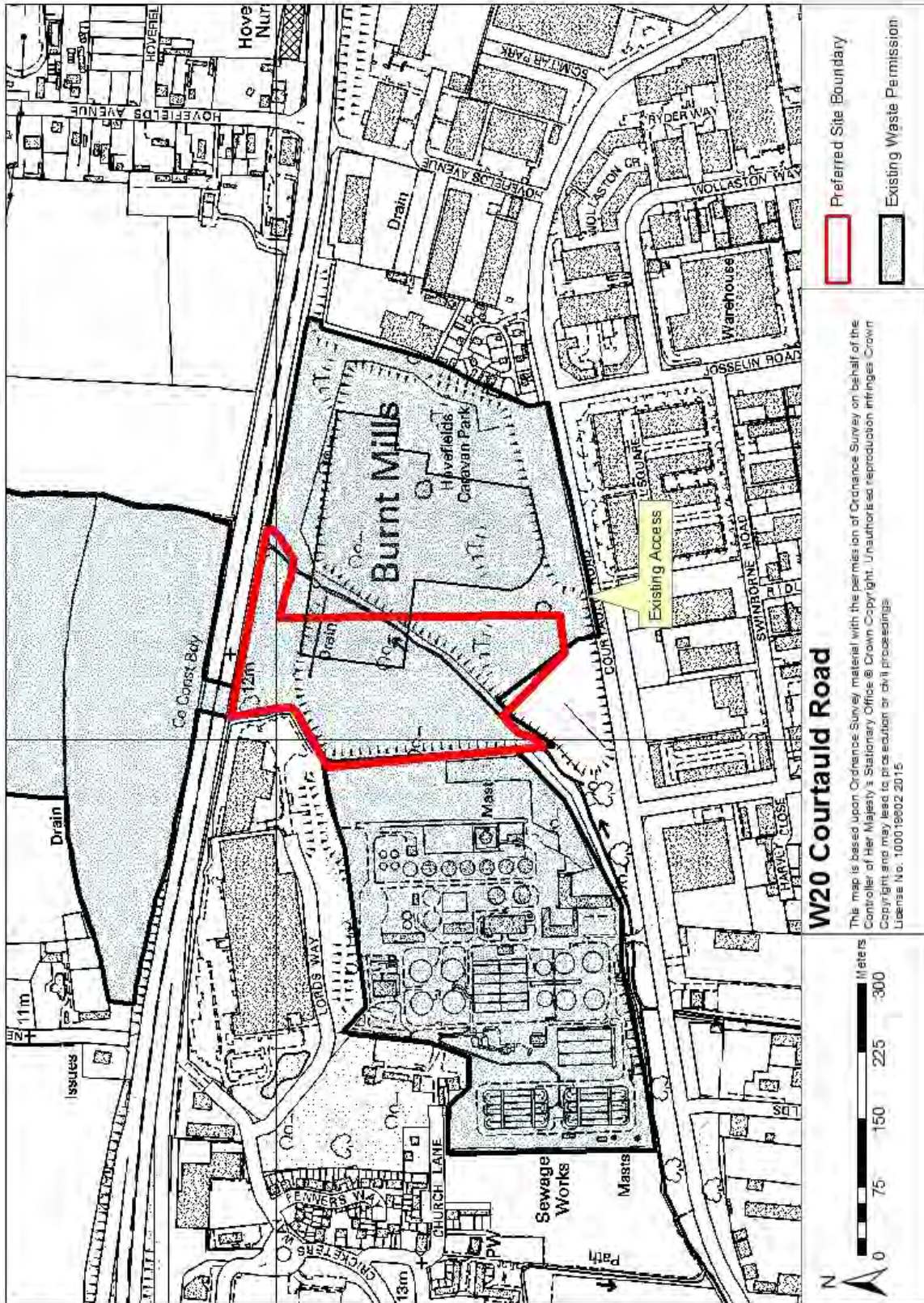
This site comprises rough grassland adjoining the Tovi Eco Park IWMF. To the west is the existing waste water treatment works. The following specific issues and opportunities are to be addressed:

- A small piece of land, fronting onto the A127, at the northern edge of the site may contain archaeological deposits. If approved this small area may need trial trench in this one small plot but this would be undertaken post consent. The remainder of the site has been reduced and the archaeological deposits removed.
- To demonstrate that there would not be an adverse effect on a European site through HRA.

Notes:

- Any potential odour issues will be addressed by the Environment Agency in the interests of protecting local amenity.
- Nevendon Brook has been diverted around the western boundary and is no longer at risk of flooding.

Map 10 W20 - Courtauld Road



**Table 11 Little Bullocks and Crumps Farm, Great and Little Canfield**

<b>District</b>	Uttlesford
<b>Area</b>	6.90ha - Site 1 6.15ha - Site 2 3.52 ha - Site 3
<b>Indicative Facility Scale</b>	420,000m <sup>3</sup> - Inert Landfill (Site 1) 45,000m <sup>3</sup> - Hazardous Landfill (Site 2) 80,000tpa - Inert Recycling Capacity (Site 3)
<b>Link to Waste and Mineral Activities</b>	Site 1 is allocated for extraction within the MLP 2014 as site A22. Site 2 is allocated for extraction within the MLP 2014 as site A23.
<b>Site Allocation For</b>	Inert Landfill Capacity (Site 1) Hazardous Landfill Capacity (Site 2) Inert Waste Recycling Capacity (Site 3)
<b>Access</b>	Via haul road through existing Crumps Farm site to B1256
<b>Estimated Availability</b>	Site 1 - 5 to 10 years Site 2 - Upon adoption of WLP Site 3 - 5 to 10 years
<b>Life</b>	Site 1 - 12 years Site 2 - 15 years Site 3 - 15 years

These sites would be extensions to the existing mineral/waste site at Crumps Farm. The following issues apply to all three sites:

- A vehicle routing agreement is required to ensure the site would be accessed via the existing access for Crumps Farm onto Stortford Road (B1256) to travel via the A120/M11. An internal haul road would be required between the site and the Crumps Farm access.
- Dust mitigation measures, limits on duration (hours of operation) and noise standards (from noise sensitive properties) will be established in the interests of protecting local amenity.

The following specific issues and opportunities are to be addressed for Site 1:

- The eastern end of the site lies in a small secluded valley with a small river and nearby woodland. Advanced planting should screen views of the area from this direction, including views from the PRoW Lt Canfield 19.
- The river and Local Wildlife Site (LoWS) require protection for example through an appropriate buffer of at least 15m and through the assessment of potential hydrological impacts with appropriate protection. Existing vegetation to the south of the site should be protected and retained.
- Those areas of archaeological deposits preserved in-situ from the extraction phase shall be included as part of any restoration scheme.
- The impacts from the proposal need to be addressed on the designated buildings located in the vicinity - especially on the setting of the Church of All Saints.
- The site layout should ensure a sequential approach is adopted whereby areas of greater vulnerability, such as buildings and stockpiles are located in Flood Zone 1.
- Careful consideration must be given to the final restoration contours to ensure the final landform blends with the surrounding topography and the restoration would be predominantly back to agricultural use given the presence of Grade 2 agricultural soil.

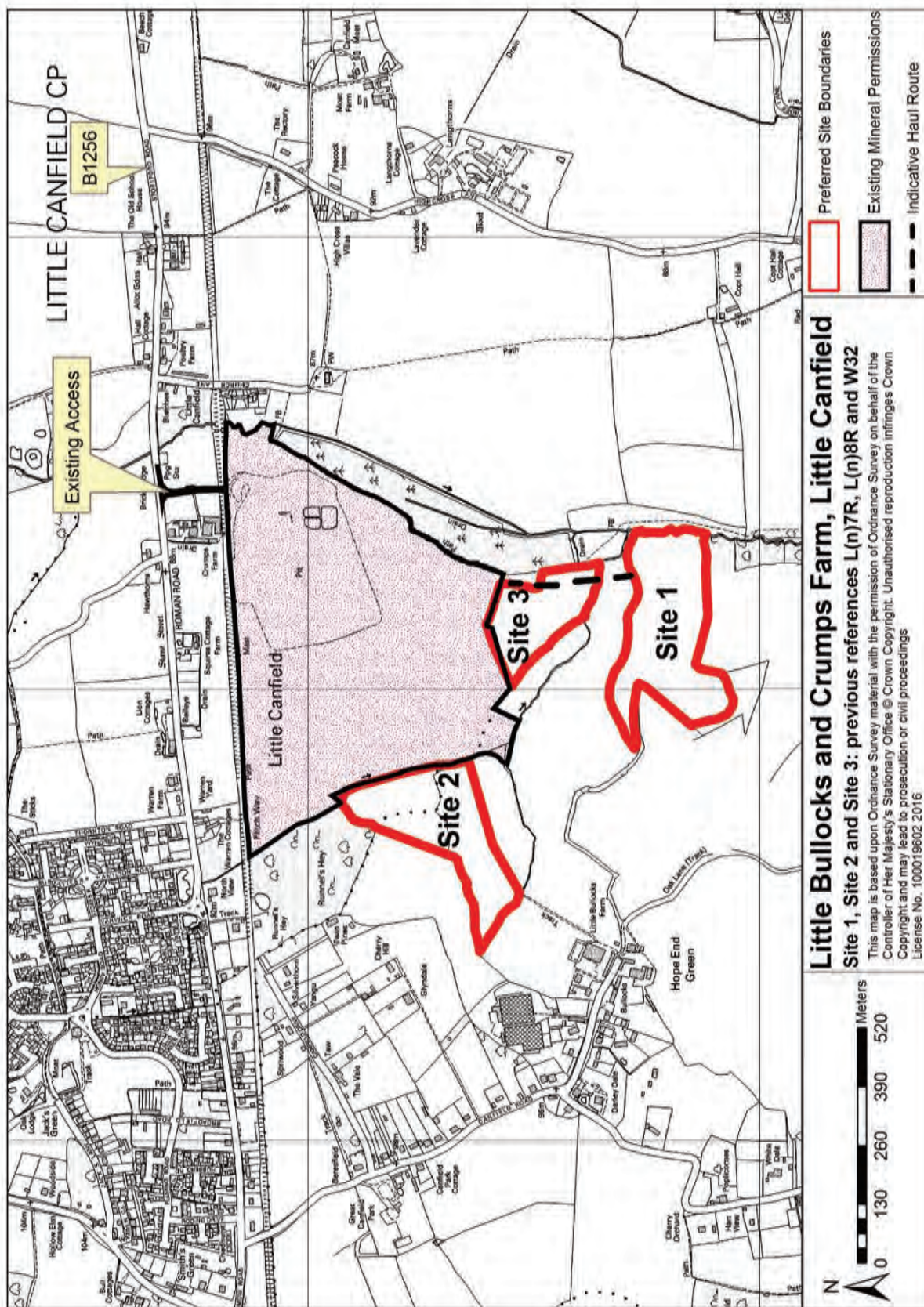
The following specific issues and opportunities are to be addressed for Site 2:

- Residential property off Canfield Drive with views of the site should be protected by appropriate bunding/screening. Gaps in hedging on the boundary should be addressed to screen views.
- The site is adjacent to a Local Wildlife Site (UFD 172 – Runnels Hey), and area of Ancient Woodland. This site must be protected for example, through an appropriate buffer.
- To demonstrate that there would not be an adverse effect on a European site through HRA. Any development would need to ensure that there would not be an adverse impact on water quality.
- A hydrological assessment should be undertaken.
- Those areas of archaeological deposits preserved in-situ from the extraction phase shall be included as part of any restoration scheme.
- The impacts from the proposal need to be addressed on the designated buildings located in the vicinity - especially on the setting of Church of All Saints.
- PRoW footpaths Great Canfield 2 and Little Canfield 8 cross the site and would require temporary diversion during operations.
- Careful consideration must be given to the final restoration contours to ensure the final landform blends with the surrounding topography and the restoration would be predominantly back to agricultural use given the presence of Grade 2 agricultural.

The following specific issues and opportunities are to be addressed for Site 3:

- An archaeological evaluation should be undertaken to assess the area for surviving archaeological deposits. This should comprise a programme of trial trenching covering the total area of development. If deposits are identified then an appropriate mitigation strategy for preservation in situ or preservation by excavation should be submitted.
- Any proposal shall include planting to screen development on south and east boundaries of the site.

Map 11 L(n)7R and L(n)8R - Little Bullocks Farm and W32 - Crumps Farm, Gt and Lt Canfield





**Table 12 Dollymans Farm**

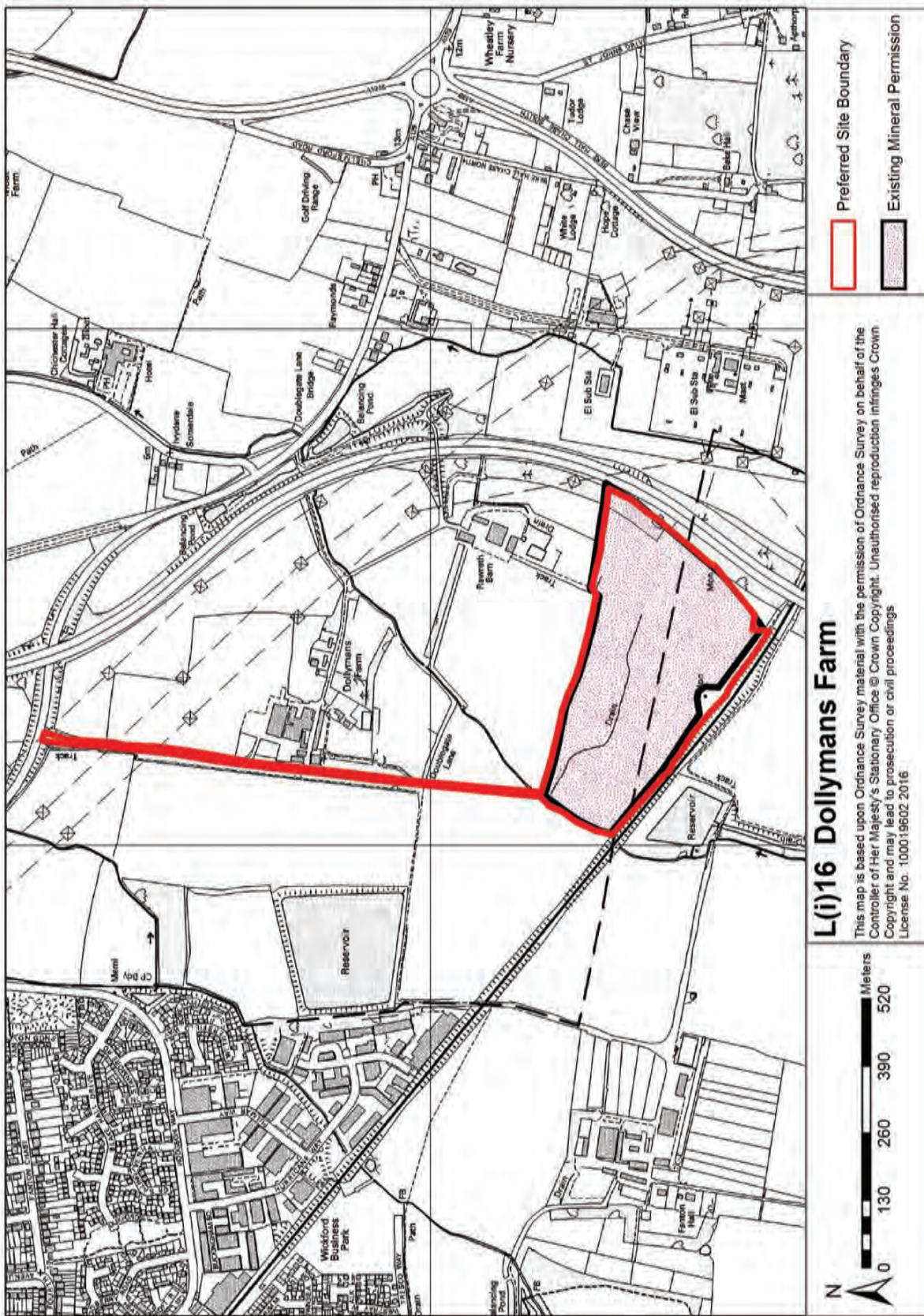
<b>District</b>	Basildon/Rochford
<b>Area</b>	16.09ha
<b>Indicative Facility Scale</b>	500,000 tonnes
<b>Link to Waste and Minerals Activities</b>	The site constitutes a former mineral borrow pit
<b>Site Allocation For</b>	Inert Landfill Capacity
<b>Access</b>	Via private road adjoining A129
<b>Estimated Availability</b>	2017
<b>Life</b>	Up to 5 years

This site would culminate in the restoration of a former mineral void. The following specific issues and opportunities are to be addressed:

- All access should be via the A129. A Transport Assessment would be required at the planning application stage to review access arrangements and examine safety and capacity of the local road network. This may result in the diversion of bridleway to segregate users from vehicles or other mitigation works.
- The proposal should demonstrate that there would not be an adverse effect on a European site through HRA. Such an assessment should include consideration of functionally linked land, and must demonstrate no adverse effects on the integrity of any international site. Evidence will change over time regarding the preferences of species such as the Dark-bellied Brent Geese, so appropriate foraging distances should be reviewed as part of any HRA.
- Chichester Hall Brook requires protection, for example through an appropriate buffer of at least 15m and through the assessment of potential hydrological impacts with appropriate protection.
- Restoration of the site through this allocation provides the significant opportunity for biodiversity, landscape, visual enhancement and historic asset preservation. Careful consideration of the environmental impacts of the waste development will be necessary as part of a planning application with proportionate levels of mitigation to be established. Specifically, the WPA would seek the overall landscape improvement of the site, with the final restoration and long-term aftercare to be beneficial to the Green Belt and biodiversity with particular reference to habitat creation in line with the Northern Thames Basin National Character Area.
- Retain trees and shrubs to screen plant and materials from the road. Consider new planting and bunding to screen views into the site prior to commencement of landfilling operations
- Dust mitigation measures, limits on duration (hours of operation) and noise standards (from noise sensitive properties) will be established in the interests of protecting local amenity.
- An Archaeological Desk Based Assessment should be carried out to identify the extent of preservation within the northern part of the site and preservation requirements around war memorials.

- Areas of archaeological deposits preserved in situ will require excavation if working is likely to cause ground disturbance in the north western part of the site
- A management proposal for the survival and maintenance of the memorial for the burial sites should be submitted with any application.

Map 12 L(i)16 Dollymans Farm



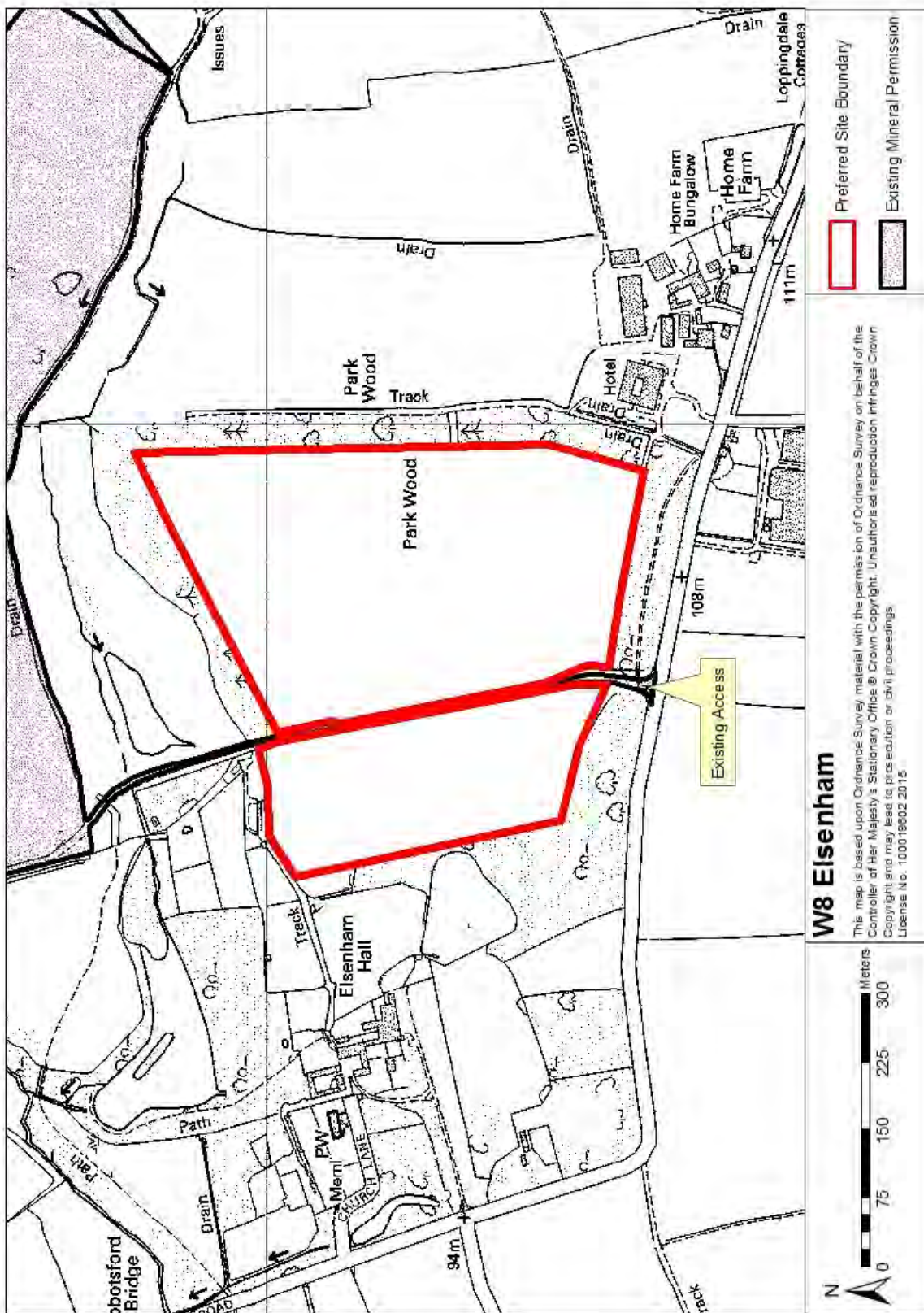
**Table 13 Elsenham**

<b>District</b>	Uttlesford
<b>Area</b>	15.65ha
<b>Indicative Facility Scale</b>	40,000tpa
<b>Link to Waste and Mineral Activities</b>	Adjoins Quarry Access
<b>Site Allocation For</b>	Inert Waste Recycling Capacity
<b>Access</b>	Haul Road, Elsenham Quarry
<b>Estimated Availability</b>	Adoption of WLP (2017)
<b>Life</b>	Permanent

This undeveloped site lies either side of the existing haul road to Elsenham Quarry. The following specific issues and opportunities are to be addressed:

- A vehicle routing agreement is required to ensure use of the appropriate road network.
- Retain existing woodland and screen development with new planting.
- The proposed development site falls within the setting of the Grade I listed Church of St. Mary the Virgin, the Grade II listed Elsenham Hall, and a group of non-designated heritage assets directly to the east of the church. The land to the west of the haul road should be retained for mitigation purposes only (including a robust scheme of landscaping) with the waste management facility being located entirely within land to the east of the haul road.
- The impacts from the proposal on designated assets as well as assessing the significance of previously unidentified undesignated assets should address: (1) the setting and significance of the listed buildings in the vicinity of the site; (2) the relationship and impact on the historic parkland including surviving elements such as boundary ditches, earthworks original trees etc. A trial trenching exercise should be undertaken to assess the area for surviving archaeological deposits. If deposits are identified then an appropriate mitigation strategy should be submitted.
- The adjoining habitat to the west would require mitigation proportional to the quality of the adjacent habitat and the nature and scale of the impacts. Should the adjoining land to the west be assessed at the DM stage as being of Local Wildlife Sites (LoWS) quality, there would need to be substantial mitigation including an enclosed facility being preferable to an open air facility. If it is not of LoWS quality there should still be appropriate levels of mitigation, including a significant buffer on the western boundary.
- Dust mitigation measures, limits on duration (hours of operation) and noise standards (from noise sensitive properties) will be established in the interests of protecting local amenity.

Map 13 W8 - Eisenham



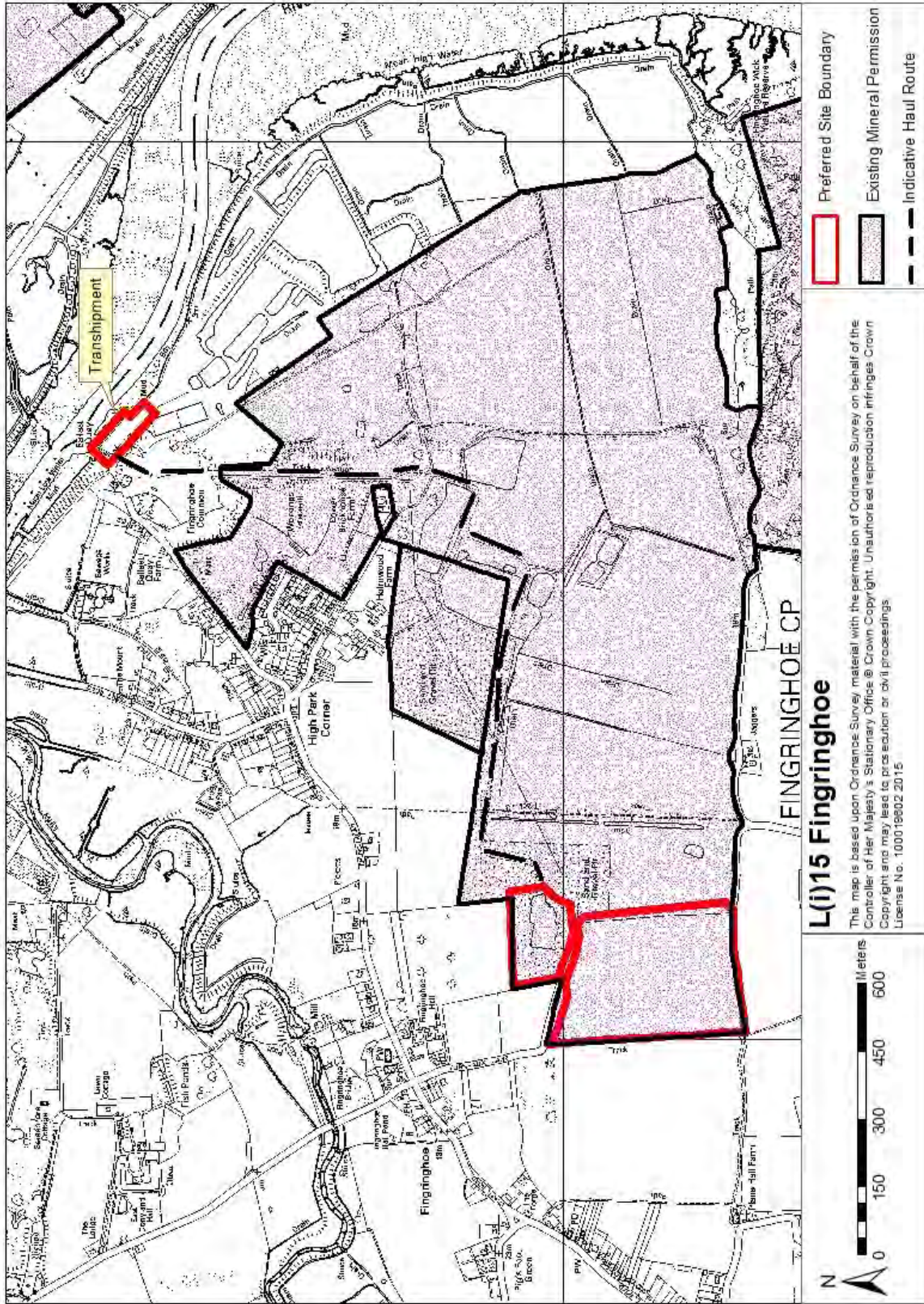
**Table 14 Fingringhoe Quarry**

<b>District</b>	Colchester
<b>Area</b>	13.17ha
<b>Indicative Facility Scale</b>	600,000m <sup>3</sup>
<b>Link to Waste and Minerals Activities</b>	ESS/22/00/COL mineral extraction
<b>Site Allocation For</b>	Inert Landfill Capacity
<b>Access</b>	Via adjoining Ballast Quay Wharf
<b>Estimated Availability</b>	Immediately
<b>Life</b>	10 years

This site is within a former operational quarry undergoing restoration. The following specific issues and opportunities are to be addressed:

- A reasonable proportion of waste material shall be sourced from within the Plan area.
- Waste to be used to create gentle slopes on the restored landfill site. Views from rights of way to be kept open.
- Retain trees and shrubs to screen plant and materials at Ballast Quay. Consider new planting to screen views into site.
- Any restoration plan needs to take into account the views to and from the listed Dovecote and conservation area of Fingringhoe.
- To demonstrate that there would not be an adverse effect on a European site through HRA. Most likely potential impacts to consider would be caused by disturbance and water pollution.
- There is a block of woodland in close proximity to the northwest corner of the site. Appropriate mitigation will need to be provided such as an adequate buffer.
- Restoration provides the opportunity for significant biodiversity enhancement and habitat creation on site, using upon the sandy substrate. Appropriate sized vertical, south facing sandy faces should be retained or created for wildlife, e.g. invertebrates and sand martins.

Map 14 L(i)15 Fingringhoe



**Table 15 Morses Lane, Brightlingsea**

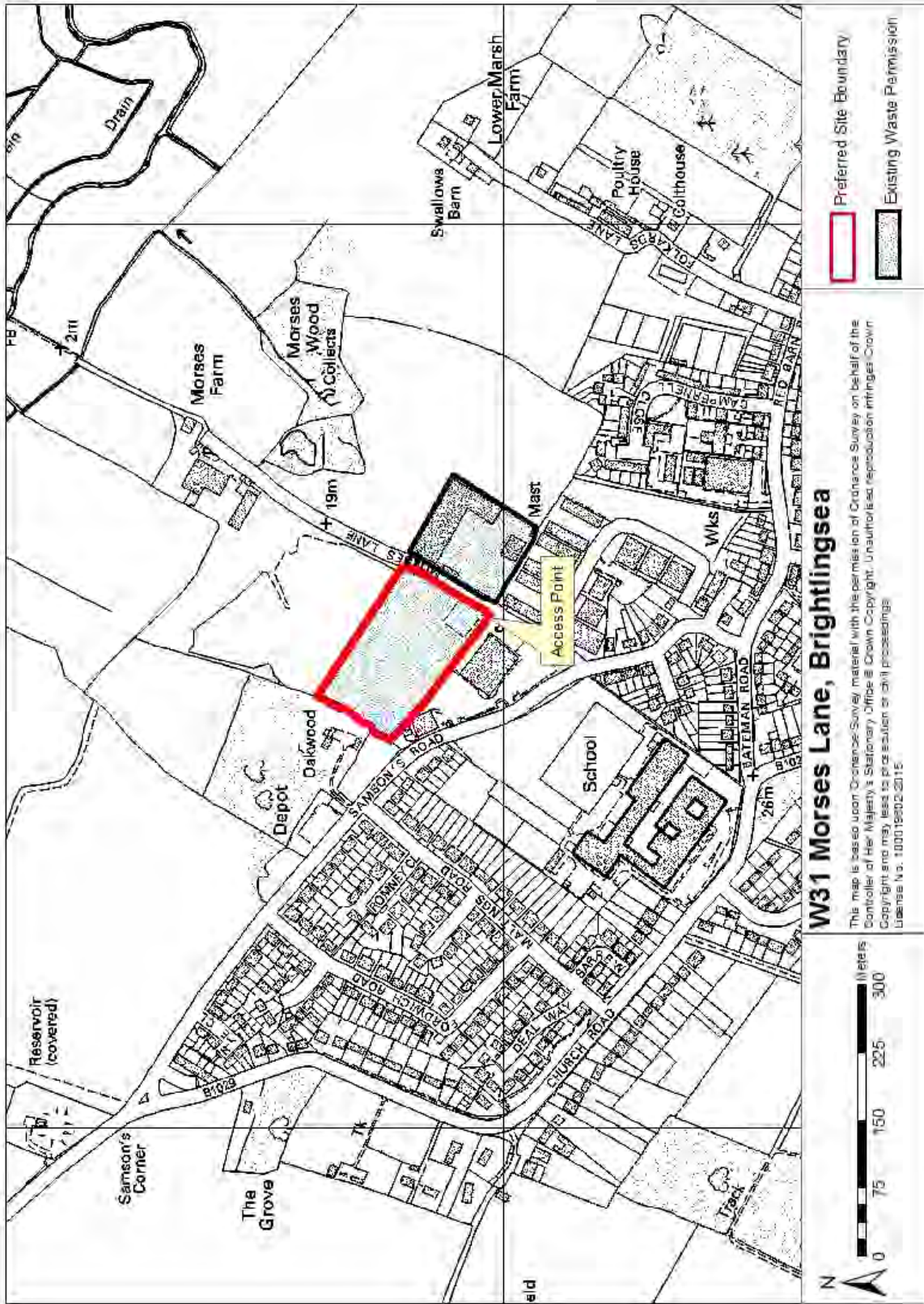
<b>District</b>	Tendring
<b>Area</b>	1.82ha
<b>Indicative Facility Scale</b>	75,000tpa
<b>Link to Waste and Mineral Activities</b>	N/A
<b>Site Allocation For</b>	Inert Waste Recycling Capacity
<b>Access</b>	Morses Lane
<b>Estimated Availability</b>	Immediately
<b>Life</b>	Permanent

This undeveloped site on the edge of an urban area adjoins an existing waste operation. The following specific issues and opportunities are to be addressed:

- To demonstrate that it could not have an adverse effect on European sites through HRA. Most likely potential impacts would be by exhaust emissions (from the road into Brightlingsea) and disturbance to birds.
- Site should be screened by planting on the north, south and west sides of the site to mitigate visual and landscape effects.
- A trial trenching evaluation should be undertaken to assess the area for surviving archaeological deposits. If deposits are identified then an appropriate mitigation strategy should be submitted.
- It is expected that operations would be enclosed within an appropriate building. Dust mitigation measures, limits on duration (hours of operation) and noise standards (from noise sensitive properties) will be established in the interests of protecting local amenity.
- The configuration and operation of the proposed facility shall have regard to impacts on neighbouring land uses, including the potential impacts on the adjacent retail use.



Map 15 W31 - Morses Lane, Brightlingsea



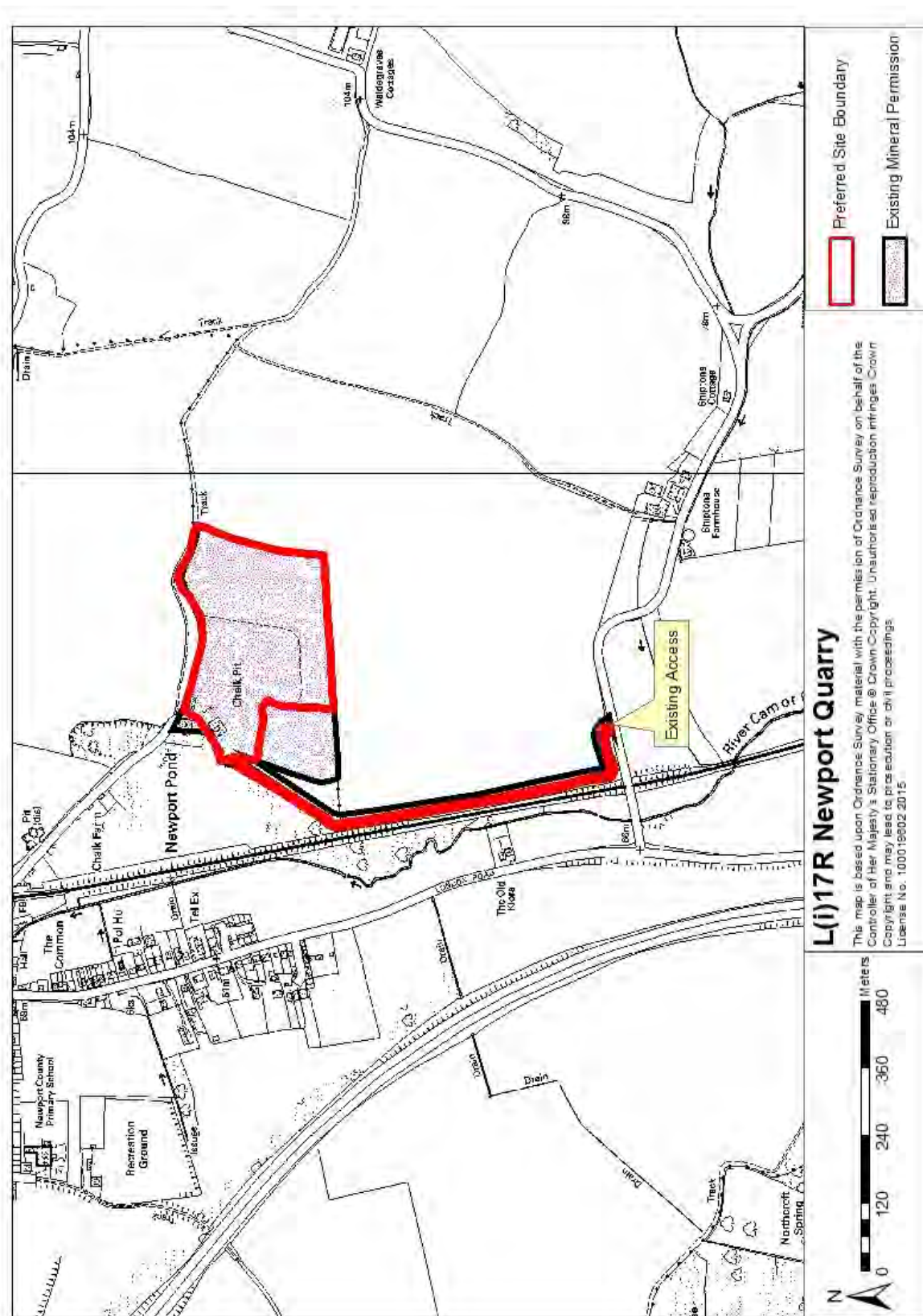
**Table 16 Newport Quarry**

<b>District</b>	Uttlesford
<b>Area</b>	8.4ha
<b>Indicative Facility Scale</b>	15,000tpa - Inert Waste Recycling Capacity 300,000m <sup>3</sup> - Inert Landfill Capacity
<b>Link to Waste and Minerals Activities</b>	ESS/17/12/UTT granted planning permission for chalk extraction
<b>Site Allocation For</b>	Inert Landfill Capacity Inert Waste Recycling Capacity
<b>Access</b>	Via Unnamed Road to B1383 London Road
<b>Estimated Availability</b>	Up to 5 years
<b>Life</b>	Until 2042

This site is within an existing quarry. The following specific issues and opportunities are to be addressed:

- The site should continue to be restored to lowland calcareous grassland, with areas also retained to demonstrate its geological importance.
- Careful consideration of the environmental and visual impacts of the waste development will be necessary as part of a planning application, particularly if a proposal relates to already restored areas. Specifically, ecological enhancement of the site would be sought, with the final restoration and long-term aftercare expected to result in the creation of lowland calcareous grassland priority habitat. It will be necessary to consider phased working to avoid the loss of existing species.
- Retain existing trees and hedges to screen views of site. Consider new planting to screen views into site.
- No development should occur outside the quarried areas as this will have the potential to impact important archaeological deposits.
- Dust mitigation measures, limits on duration (hours of operation) and noise standards (from noise sensitive properties) will be established in the interests of protecting local amenity.
- A vehicle routing agreement is required to ensure the site would be accessed via the existing access to Newport Quarry and via the Main Road Network (B1383). The number of heavy vehicle movements to and from the east shall be limited to those serving Widdington only.
- Consideration would need to be given at the planning application stage to the safe operation of the road bridge over the railway line west of the site access and the requirement for any additional traffic management.

Map 16 L(i)17R - Newport Quarry



**Table 17 Rivenhall**

<b>District</b>	Braintree
<b>Area</b>	25.51ha
<b>Indicative Facility Scale</b>	AD 30,000tpa CHP 595,000tpa
<b>Link to Waste and Mineral Activities</b>	ESS/55/14/BTE granted planning permission for integrated waste management facility, including mineral extraction
<b>Site Allocation For</b>	Biological and Residual Non-Hazardous Waste Management Capacity
<b>Access</b>	Via Coggeshall Road (A120)
<b>Estimated Availability</b>	Can be implemented immediately
<b>Life</b>	Permanent

This site is located on the former Rivenhall Airfield, which is now an active quarry accessed off the A120 highway. Part of the site is within the active quarry. The following specific issues and opportunities are to be addressed:

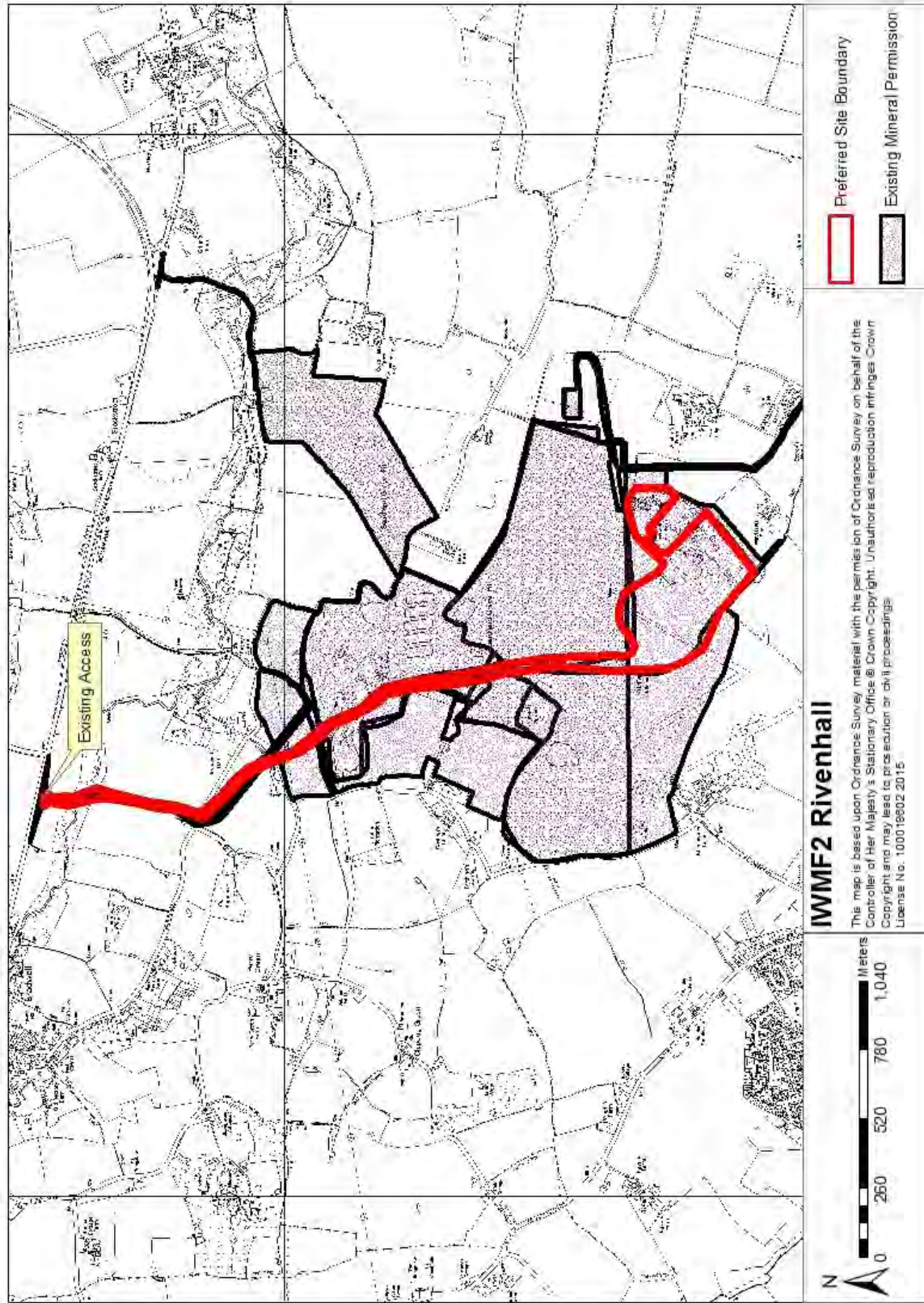
- Any development of the site would need to ensure mineral traffic associated with the quarry (MLP sites A3, A4, A5, A6 and A7) is still able to utilise the existing access road to the A120.
- Widening of private haul road to two way working and improvement of minor road crossings (as identified in S106 attached to extant planning consent for IWMF)
- Waste traffic would use the existing access, which would be required to be made to a standard suitable for road traffic from the existing mineral processing area to the waste site. HGV movements would be restricted in line with current permitted movements to avoid adverse impacts to the A120. Provision of screening on south-west, south-east and northern boundaries would be important. Views from the Essex Way should be screened. The access road to the facility should be at low level with planting on both sides of the access road.
- Future built development to be at low level, with the bulk of any structure to be below ground level. Tree Preservation Order (TPO) to be protected as much as possible and management of surrounding TPO woodland suggested to maximise screening and biodiversity value.
- The impacts from the proposal need to be addressed on the designated buildings located in the vicinity - especially on the setting of the Woodhouse Farm Listed Building
- Right of Ways – Kelvedon footpath 8 runs close to the site and its route should be protected.
- Dust mitigation measures, limits on duration (hours of operation) and noise standards (from noise sensitive properties) will be established in the interests of protecting local amenity.
- If the proposed site layout cannot accommodate the statutory easements (relevant to existing infrastructure on the site) the diversion of the existing assets may need to be considered. Any activity that requires excavation should only proceed with caution, and

the existing underground infrastructure must be supported and protected and not be put at risk from disturbance.

Notes:

- Any potential odour issues from a proposal involving organic waste would be addressed by the Environment Agency in the interests of protecting local amenity.

Map 17 IWMF 2 - Rivenhall



**Table 18 Sandon**

<b>District</b>	Chelmsford
<b>Area</b>	7ha - Sandon East 25ha - Sandon
<b>Indicative Facility Scale</b>	150,000tpa - Inert Waste Recycling Capacity 1,000,000m <sup>3</sup> (northern void)
<b>Link to Waste and Mineral Activities</b>	East Sandon - Various extant mineral and waste planning permissions. Mineral processing plant has permission to remain until 2042. The mineral area beneath the plant is still to be worked.  Sandon - Various relevant mineral and waste planning permissions. ESS/30/11/CHL for the continuation of infilling of the existing southern void
<b>Site Allocation For</b>	Sandon East -Inert Waste Recycling Capacity Sandon - Inert Landfill Capacity
<b>Access</b>	A1114 Southend Road
<b>Estimated Availability</b>	Adoption of WLP (2017)
<b>Life</b>	East Sandon - Permanent  Sandon - Full restoration within 5 years

This site making use of the existing haul road onto the A12 has a number of permitted waste/mineral activities with active landfilling in the western half. The following issues and opportunities are to be addressed:

- Improvements to the A1114 (Essex Yeomanry Way) /Southend Road southbound off slip road.
- A traffic management/priority control system to manage the single width private haul road in the vicinity of the site access, or alternative solution e.g road widening/passing bays.
- A heritage assessment needs to: (1) identify those areas of the proposed site that have the potential to retain archaeological deposits; (2) Identify the nature of the archaeological deposits that are likely to survive and (3) identify the areas potential of surviving palaeo-environmental/ geo-archaeological deposits. Following on from the work above an intrusive evaluation will be required to assess for below ground archaeological deposits and to assess for geological and palaeo-environmental sequences within the site.
- The impacts from the proposal need to be addressed on the designated buildings on the edge of the application site (Sandon Hall and Mayes Farmhouse). Limits on duration (hours

of operation) and noise standards would be required in the interests of protecting local amenity.

- If the proposed site layout cannot accommodate the statutory easements (relevant to existing infrastructure on the site) the diversion of the existing assets may need to be considered.

The following specific issues and opportunities are to be addressed for Sandon East:

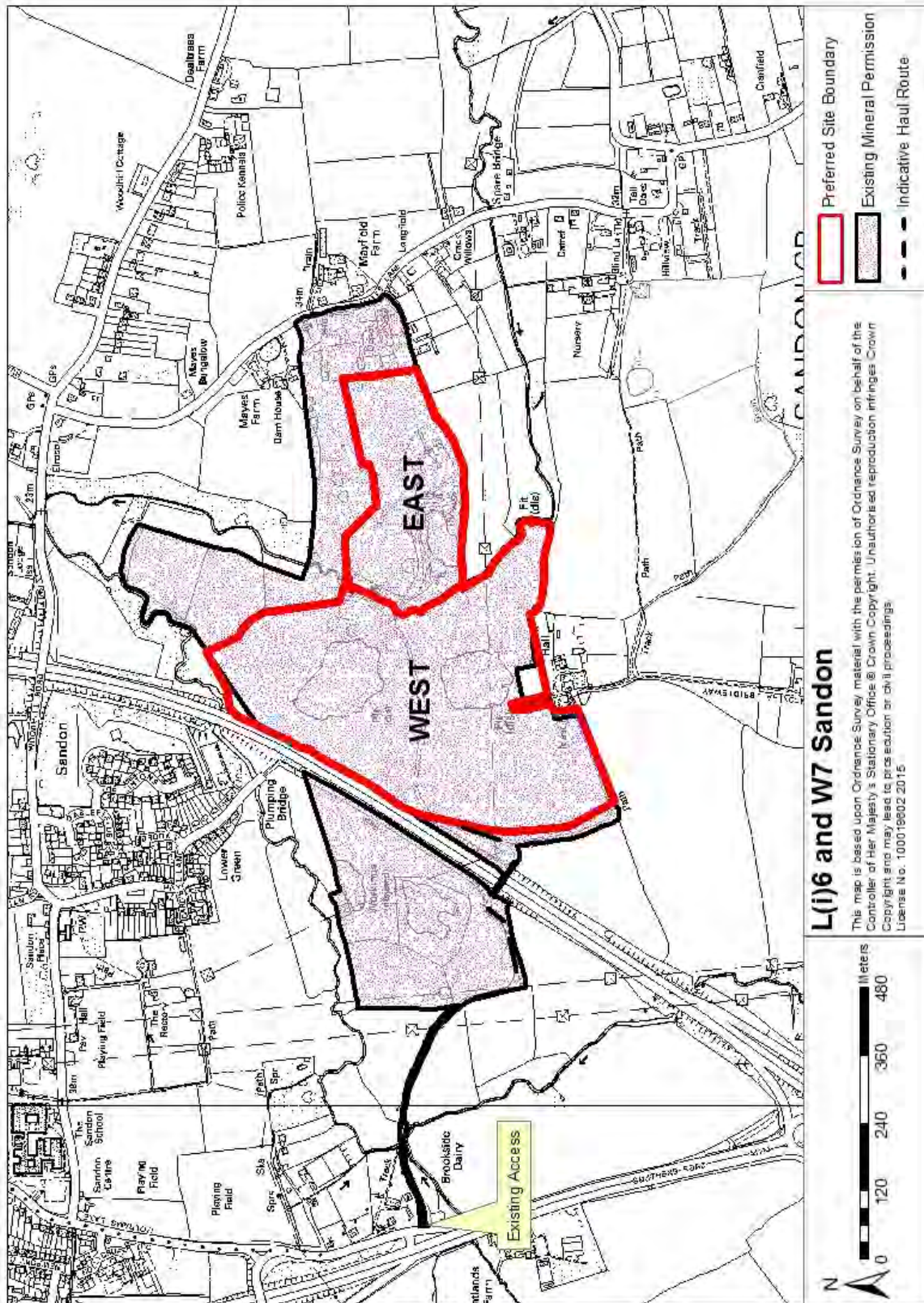
- Existing on-site landscaping including southern and northern shelter belts should be retained.
- Control of total height of structure to be compatible with existing height of shelter belts.

The following specific issues and opportunities are to be addressed for Sandon West:

- Filling of the northern void (a County Wildlife Site) would require some form of biodiversity offsetting or compensation land (since mitigation is unlikely to be possible for the proposed damage to habitats).
- Dust mitigation measures, limits on duration (hours of operation) and noise standards (from noise sensitive properties) will be established in the interests of protecting local amenity.
- Any activity that requires excavation should only proceed with caution, and the existing underground infrastructure must be supported and protected and not be put at risk from disturbance.



Map 18 L(i)6 and W7 - Sandon and Sandon East



**L(i)6 and W7 Sandon**

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- Preferred Site Boundary
- Existing Mineral Permission
- Indicative Haul Route

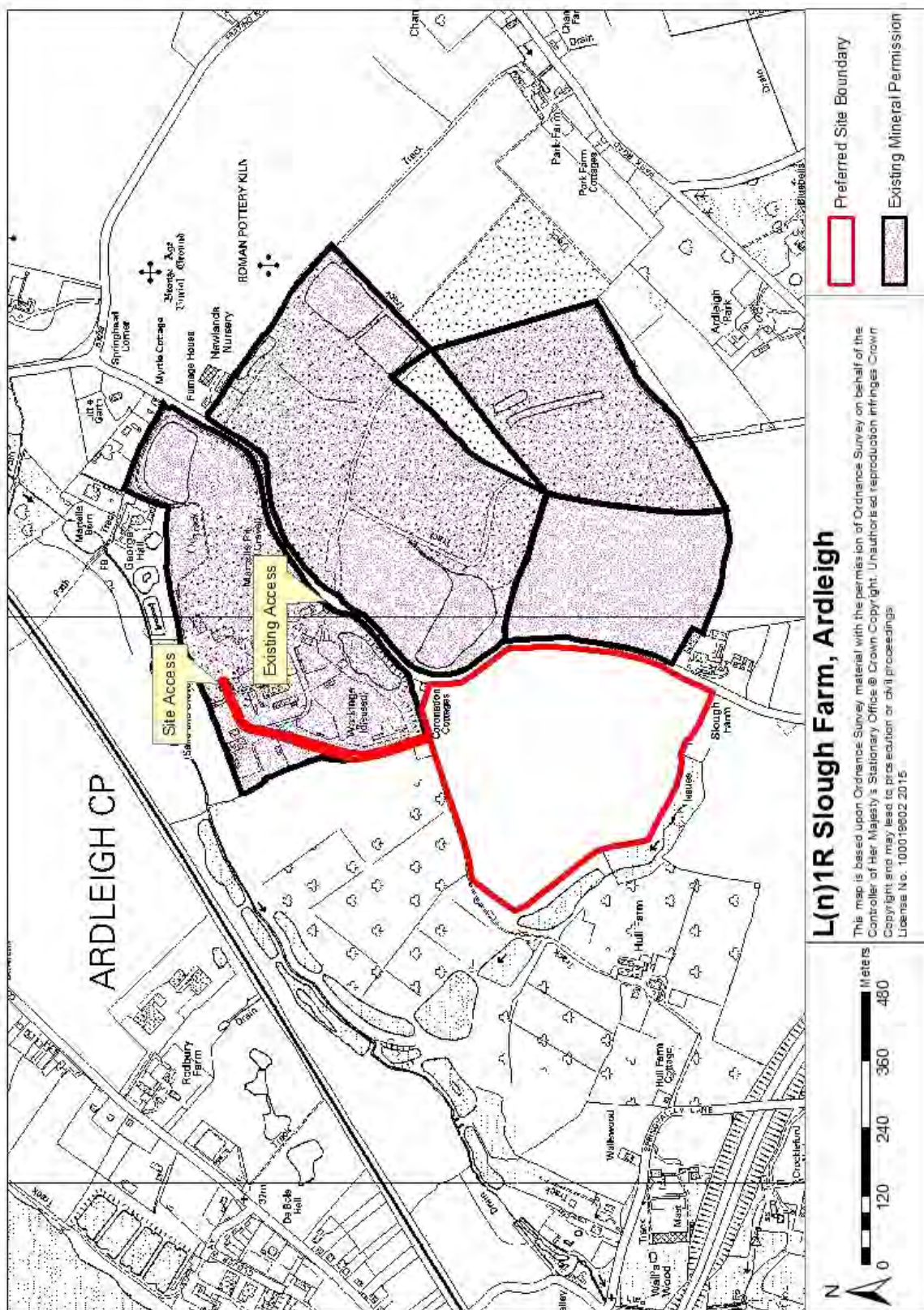
**Table 19 Slough Farm, Ardleigh**

<b>District</b>	Tendring
<b>Area</b>	15.65ha
<b>Indicative Facility Scale</b>	40,000tpa - Inert Waste Recycling 1,000,000m <sup>3</sup> - Inert Landfill Capacity
<b>Link to Waste and Mineral Activities</b>	Relevant Planning history as it is allocated for mineral extraction in the MLP (B1)
<b>Site Allocation For</b>	Inert Waste Recycling Inert landfill Capacity
<b>Access</b>	Road using Slough Lane
<b>Estimated Availability</b>	5-10 years
<b>Life</b>	19 years

This site would be an extension to the existing waste / mineral site at Martells Quarry. The following specific issues and opportunities are to be addressed:

- Access to the road network to be by way of continued use of the private track access to the A120, via the lorry park.
- Performance of the A120 junction is to be monitored and any need to improve it to accommodate traffic from the proposed development to be identified as early as possible in the planning process.
- Trees which provide screening on the north, south and west boundaries should be protected from the effects of landfilling.
- Those areas of archaeological deposits preserved in-situ from the extraction phase shall be included as part of any restoration scheme.
- Dust mitigation measures, limits on duration (hours of operation) and noise standards (from noise sensitive properties) will be established in the interests of protecting local amenity.
- The aggregate recycling operation should be tied to the life of landfilling within the Slough Farm site and hence be able to be removed at the cessation of landfilling operations.
- Careful consideration must be given to the final restoration contours to ensure the final landform blends with the surrounding topography and the restoration would be predominantly back to agricultural use.

Map 19 L(n)1R - Slough Farm



**Table 20 Sunnymead, Elmstead & Heath Farms**

<b>District</b>	Tendring
<b>Area</b>	63.74ha - Site 1 7ha - Site 2
<b>Indicative Facility Scale</b>	1,800,000m <sup>3</sup> - Inert Landfilling Capacity (Site 1) 40,000tpa - Inert Waste Recycling (Site 2)
<b>Link to Waste and Minerals Activities</b>	Site is allocated for extraction within the MLP 2014 (site A20)
<b>Site Allocation For</b>	Inert Landfill Capacity (Site 1) Inert Waste Recycling (Site 2)
<b>Access</b>	Current Haul road extended in from currently operational processing area where the existing access off Keelers Tye & B1027 will be used
<b>Estimated Availability</b>	2018
<b>Life</b>	17 years

These sites would be an extension to the existing mineral site at Wivenhoe Quarry. The following specific issues and opportunities are to be addressed:

- The site would be an extension to the existing Wivenhoe Quarry, linked by a haul route to the existing processing plant and utilising the existing highway access onto the B1027.
- Improvements required to visibility at the junction of the private access and Keelers Tye.
- Restoration provides the opportunity for significant biodiversity enhancement and habitat creation on site. In-filling and restoration should be in line with habitat creation and outcomes sought in the Minerals Local Plan and any associated documents.
- Cockaynes Wood Local Wildlife Site adjoins the southern boundary and would require protection during operations.
- An archaeological desk based assessment would be required to investigate the gravels to establish their potential for archaeological remains and trial trench evaluation will be required, along with a mitigation strategy, to form part of the Environmental Statement.
- Those areas of archaeological deposits preserved in-situ from the extraction phase shall be included as part of any restoration scheme.
- PRoW footpath Elmstead 24 crosses site 1 and is adjacent to site 2, and requires sufficient stand-off distance and protection during operations (e.g., satisfactory crossing point(s) provided for quarry vehicles).

- Dust mitigation measures, limits on duration (hours of operation) and noise standards (from noise sensitive properties) will be established in the interests of protecting local amenity.
- Careful consideration must be given to the final restoration contours used to ensure the final landform blends with the surrounding topography and to ensure Grade 2 agricultural soils are retained on site.

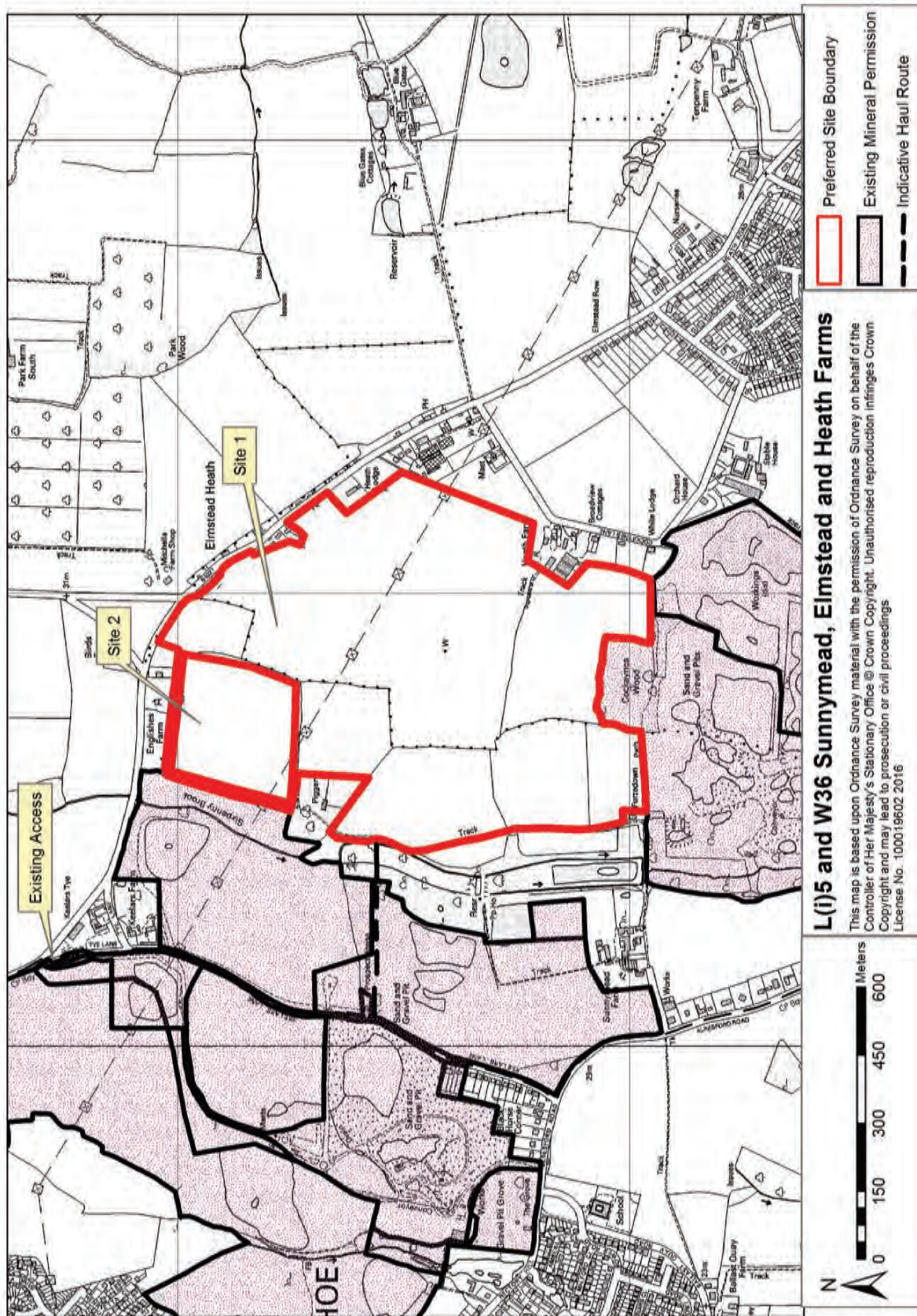
The following specific issues and opportunities are to be addressed for Site 1:

- A minimum of 100m standoff should be provided for all residential properties and effective screening provided to screen views of the site.
- Cockaynes Wood Local Wildlife Site adjoins the southern boundary and would require protection during operations.
- Footpaths Elmstead 19 and Alresford 2 also run along the southern boundary and through Cockaynes Wood and need protection during operations. The ability to reinstate these fully needs to be investigated as part of the suggested restoration scheme.

The following specific issues and opportunities are to be addressed for Site 2:

- Bunding will be required around those parts of the site which are not adequately screened by natural vegetation.

Map 20 L(i)5 and W36 Sunnymead, Elmstead and Heath Farms



## Appendix C - Development Excluded from Safeguarding Provisions

## C Appendix C - Development Excluded from Safeguarding Provisions

**C.1** District/Borough/City councils in the Plan area should consult the Waste Planning Authorities on planning applications made on land within Waste Consultation Areas to ensure that waste management facilities are not compromised by non-waste development.

**C.2** However, it is neither practicable nor necessary for consultation to occur on all developments proposed through planning applications. The table below sets the developments proposed to be subject to consultation with the Waste Planning Authorities. The development types below include those relating to temporary structures and uses:

**Table 21 Development in Waste Consultation Areas**

Nature of Development	Included or Excluded from consultation with the Waste Planning Authority
Applications for development on land, which is already allocated in adopted local development plan documents.	Included
Proposals for minor infilling of development within the defined settlement limits for towns, villages and hamlets identified in adopted local development plan documents.	Included
Applications for householder development including: <ul style="list-style-type: none"> <li>• Construction of a replacement dwelling where the new dwelling occupies the same or similar footprint to the building being replaced;</li> <li>• Minor extensions to existing dwellings or properties where they lie within the immediate curtilage and would not bring the building within 250m of the boundary of an existing strategic facility or preferred site allocation;</li> <li>• Proposals for the provision of incidental and non-habitable structures lying within the curtilage of an existing dwelling (such as driveways, garages, car parks and hard standing).</li> </ul>	Excluded
Proposals for the erection of agricultural buildings immediately adjacent to an existing working farmstead.	Excluded
Applications <ul style="list-style-type: none"> <li>• From B2/B8 to any other use</li> <li>• To Class A and C, from any other use.</li> </ul>	Included
Other applications for change of use.	Excluded
Applications related to existing permissions such as for reserved matters, or for minor amendments to current permissions.	Excluded



Nature of Development	Included or Excluded from consultation with the Waste Planning Authority
Applications for other kinds of consent – advertisements; listed building consent; Conservation Area consent and proposals for work to trees or removal of hedgerows.	Excluded
Proposals for the demolition of a residential or other building.	Excluded
Proposals for minor works such as fencing or bus shelters.	Excluded
Proposal for any extension of and/or change to the curtilage of property.	Included
Proposals for B2 and B8 development on land allocated for such uses.	Excluded

## Appendix D - Summary of Site Identification and Assessment Methodology

## D Appendix D - Summary of Site Identification and Assessment Methodology

**D.1** A detailed and bespoke methodology was developed to guide the assessment of potential site allocations for waste development to inform the WLP. The methodology is summarised below.

### Stage 1 – Assessment against five ‘Exclusionary’ criteria.

**D.2** For proposals to successfully move to subsequent stages the following criteria were to be satisfied:

- Capable of being satisfactorily accommodated in terms of site size, area and shape;
- Deliverable in planning terms;
- Outside Flood Zone 3;
- Outside SPZ1 (in the case of landfills only);
- Able to be located beyond 250m from international and national ecological designations, Areas of Outstanding Natural Beauty, National Parks and Grade I & II\* heritage designations;

### Stage 2 – Initial assessment of sites under Green Belt and Transport Terms.

**D.3** Proposals which failed either of these two following criteria were held back from subsequent stages:

- Outside the green belt;
- Suitable in transport policy, or in highways terms (even if it must be achieved through adequate mitigation);

**D.4** Unlike Stage 1 proposals that contravened these criteria were not entirely removed from any further consideration. Should there still be a need for additional facilities at the final stage exist and ‘very special circumstances’ be demonstrable then such proposals would be able to be reconsidered at the end of the process.

### Stage 3 – Detailed assessment of the sites successfully passing Stages 1 and 2 against 12 site selection criteria.

**D.5** Proposals were scored against how well they performed according to the following matters:

- Their association with positive, or at least an absence of, waste management proposals or non-waste incompatible development, permission or policy history;
- Their compatibility with neighbouring land uses (e.g., adjacent to industry or other waste facilities in the case of enclosed waste management facilities);
- The extent to which their site location is on previously developed land;
- Their set-back distance from sensitive properties given the type of facility intended (at least 250m from any residential dwelling or other sensitive land uses in the case of non-hazardous landfill unless special measures are included to control dust, noise and odour);
- The stability of the land in question (even if its achieved through stabilisation measures incorporated into the proposal);
- Suitability in terms of landscape or visual effects;
- Suitability in terms of the impact it is having on biodiversity and ecology;

- Suitability in terms of the impact on designated heritage assets and archaeological remains so that if it is severe it can be mitigated;
- Proximity to key centres of growth (Basildon, Chelmsford, Colchester, Harlow and Southend-on-Sea) depending upon the type of facility intended.

**Stage 4 - Cross-checking and moderation of all site assessments/scores.**

To ensure a consistent approach throughout the site assessment process, a review of the site scores and subsequent modifications were undertaken.

**Stage 5 – Identification of the most suitable sites which could meet the over-arching spatial strategy for the WLP.**

**D.6** Following cross-checking and moderation of all site assessments/scores (stage 4), sites were selected according to their ability to meet the needs of the Plan area and the spatial strategy.

## Appendix E - Areas of Search: Development Principles

## E Appendix E - Areas of Search: Development Principles

**E.1** The following information identifies 'development principles' for the Areas of Search; that is, specific issues that will need to be addressed at the planning application stage, as and when proposals come forward. Areas of Search designates the following employment land areas.

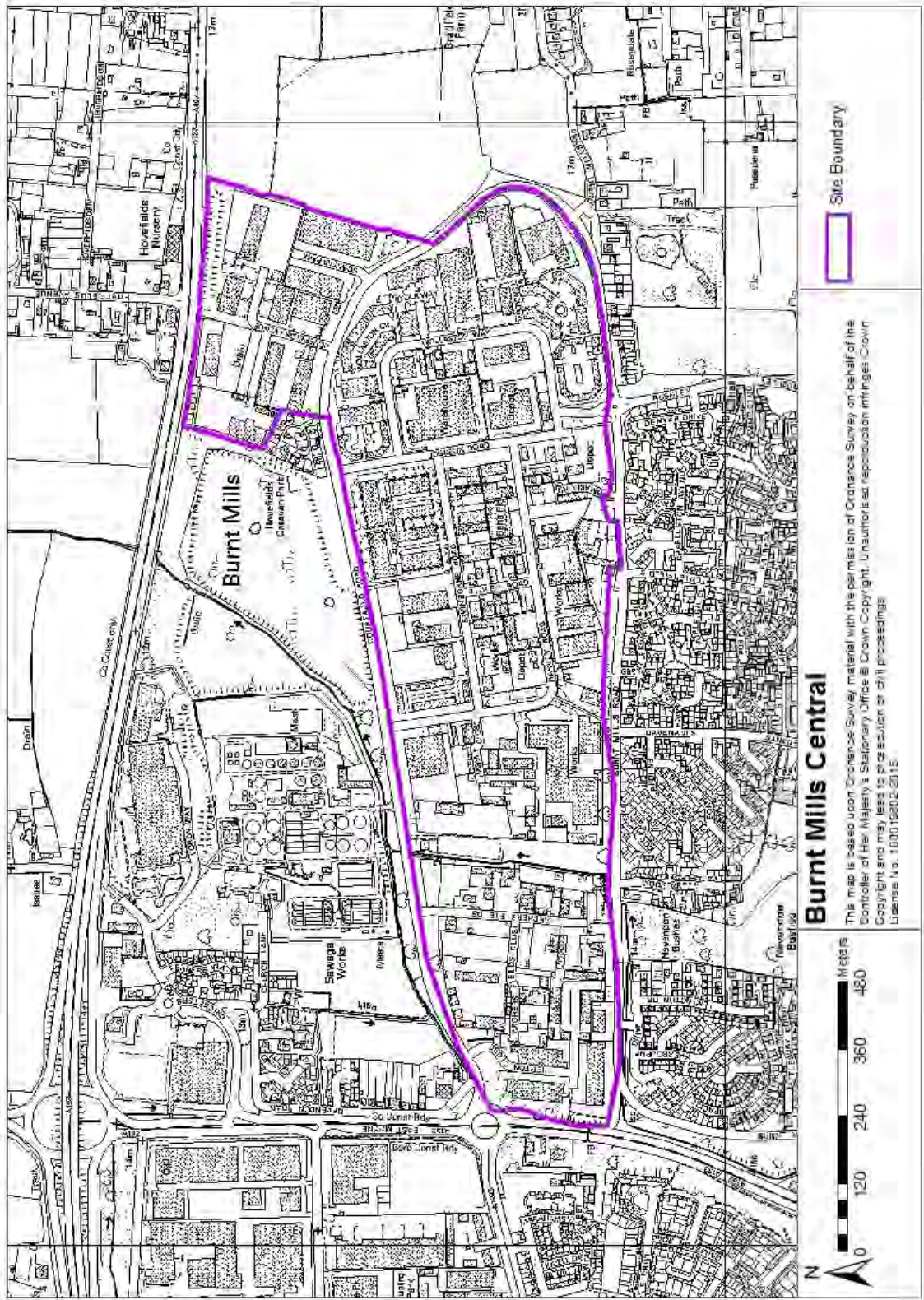
**E.2** The Environment Agency's 'Guidance for development requiring planning permission and environmental permits', states that "*new development within 250m of an existing composting activity could result in people being exposed to odour and bio-aerosol emissions*". The same document states that new development within 250m of a combustion facility might, in some cases, mean people are exposed to odour, dust or noise emissions. Whilst this Guidance is aimed at the development of new sensitive receptors within proximity to waste management development, rather than new waste management development itself, it is considered appropriate to apply this buffer when locating new waste management development in proximity to existing sensitive receptors. As such, proposals for waste facilities within Areas of Search generating bio-aerosols, through biological and/or thermal processes, will be expected to have regard to this separation distance.

**E.3** However, where waste management proposals do not include thermal processes or do not generate bio-aerosols, a reduced distance of 100m is considered more reasonable in terms of their location from sensitive receptors. This is because these facilities are not considered to generate significant air, odour or noise impacts and any impacts can often be fully contained within the site. Proposals for enclosed waste facilities within Areas of Search will be expected to have regard to this separation distance.

**E.4** These separation distances are shown on the aerial photographs found within the pro-formas associated with the Areas of Search Assessment and Methodology Report. It is noted that these measures are intended as a guide only for the purpose of this exercise. The suitability of any waste development on a designated Area of Search, or otherwise, will be judged on its merits through a planning application, where the proposal would be considered against all relevant extant policy and guidance.

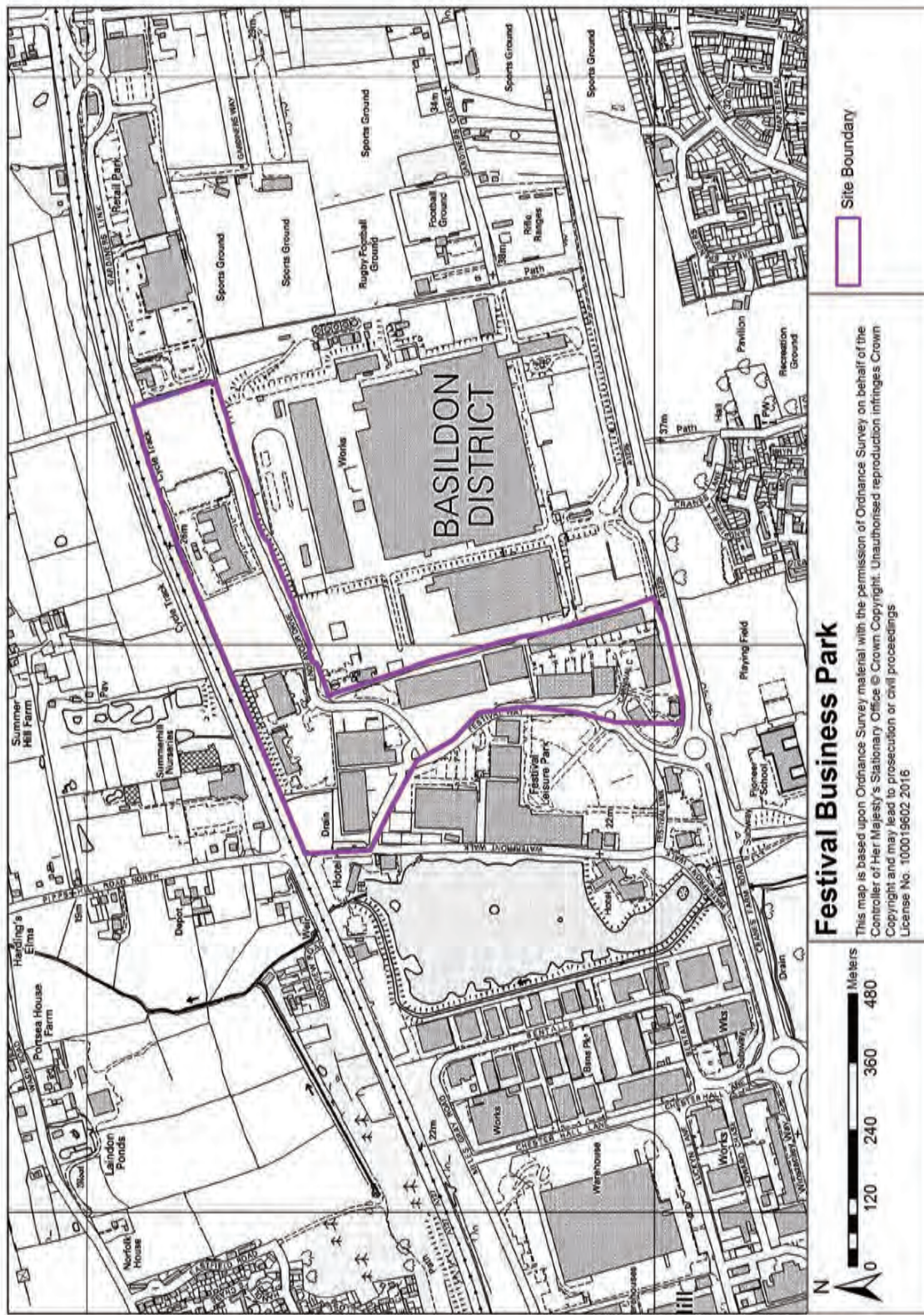
Burnt Mills Central, Basildon

Map 21 Burnt Mills Central



Festival Business Park, Basildon

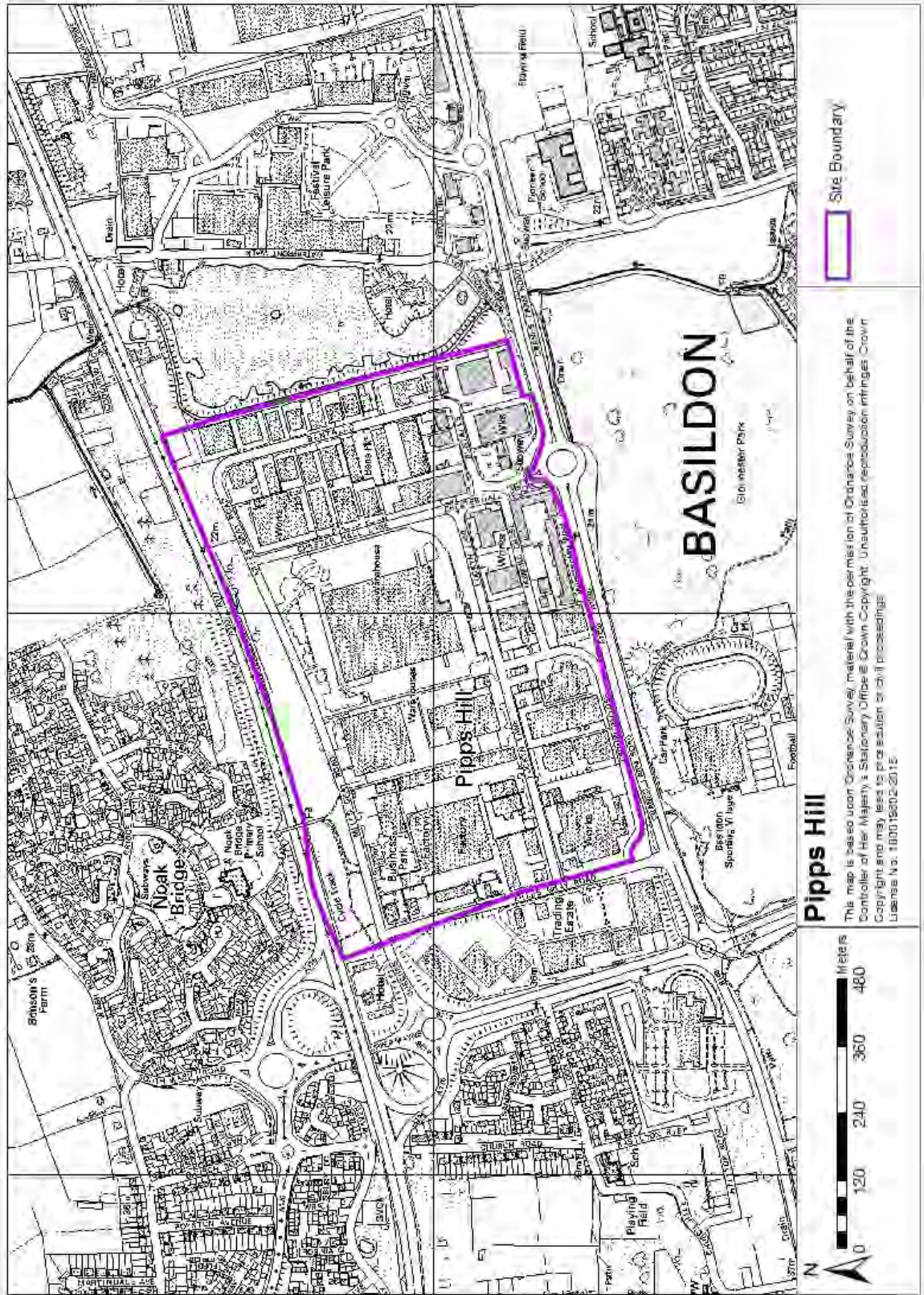
Map 22 Festival Business Park





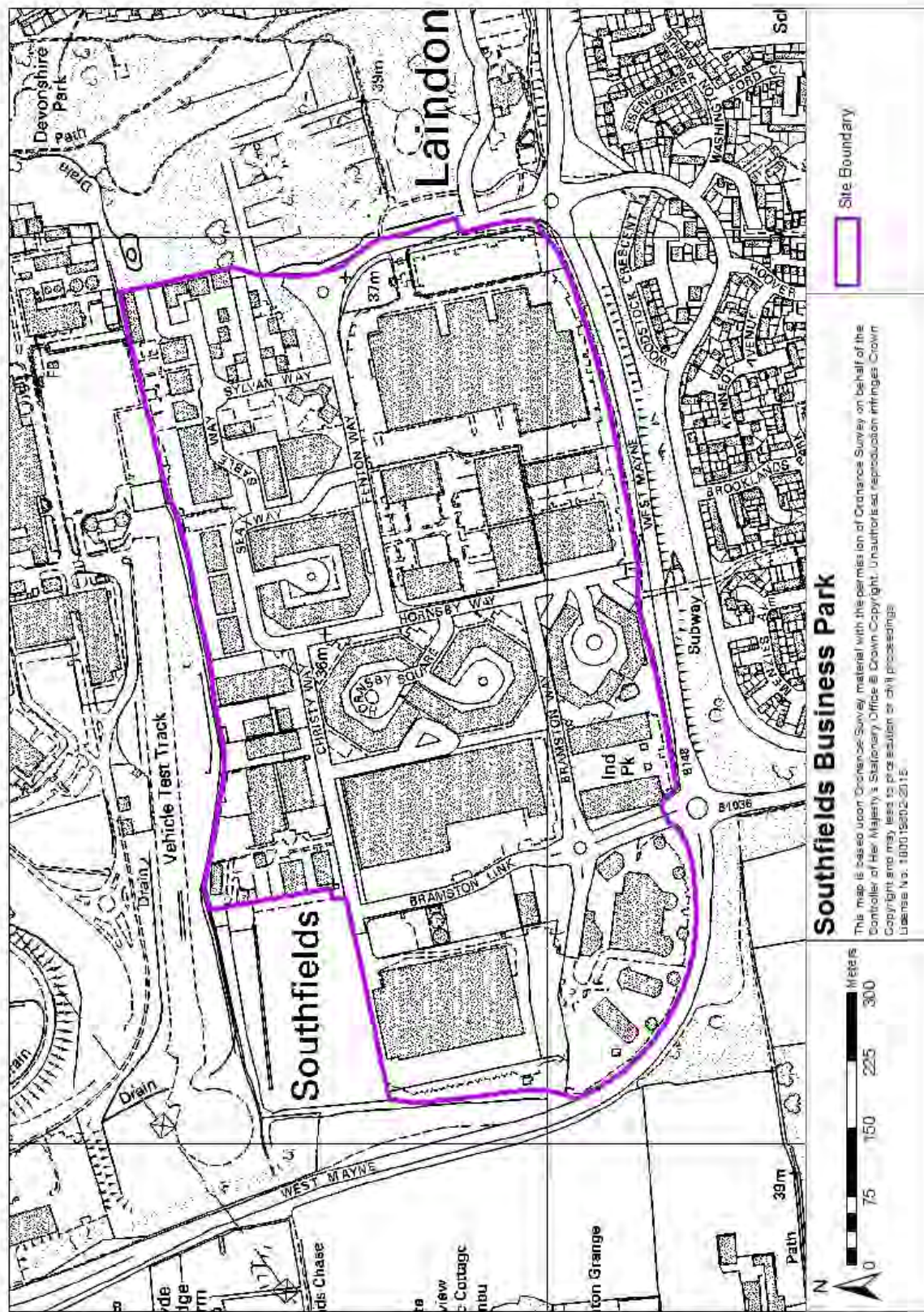
Pipps Hill, Basildon

Map 23 Pipps Hill



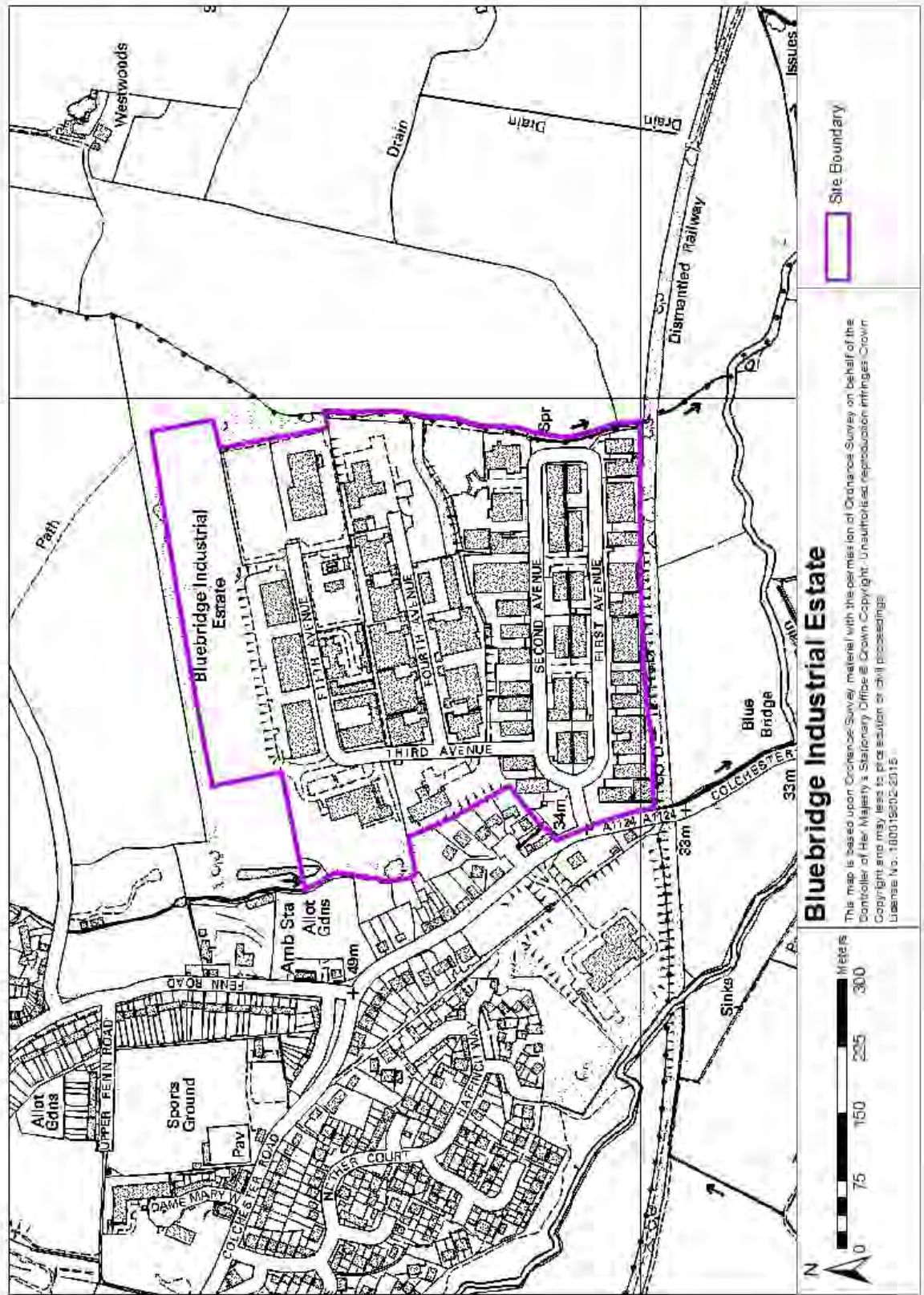
Southfields Business Park, Basildon

Map 24 Southfields Buisness Park

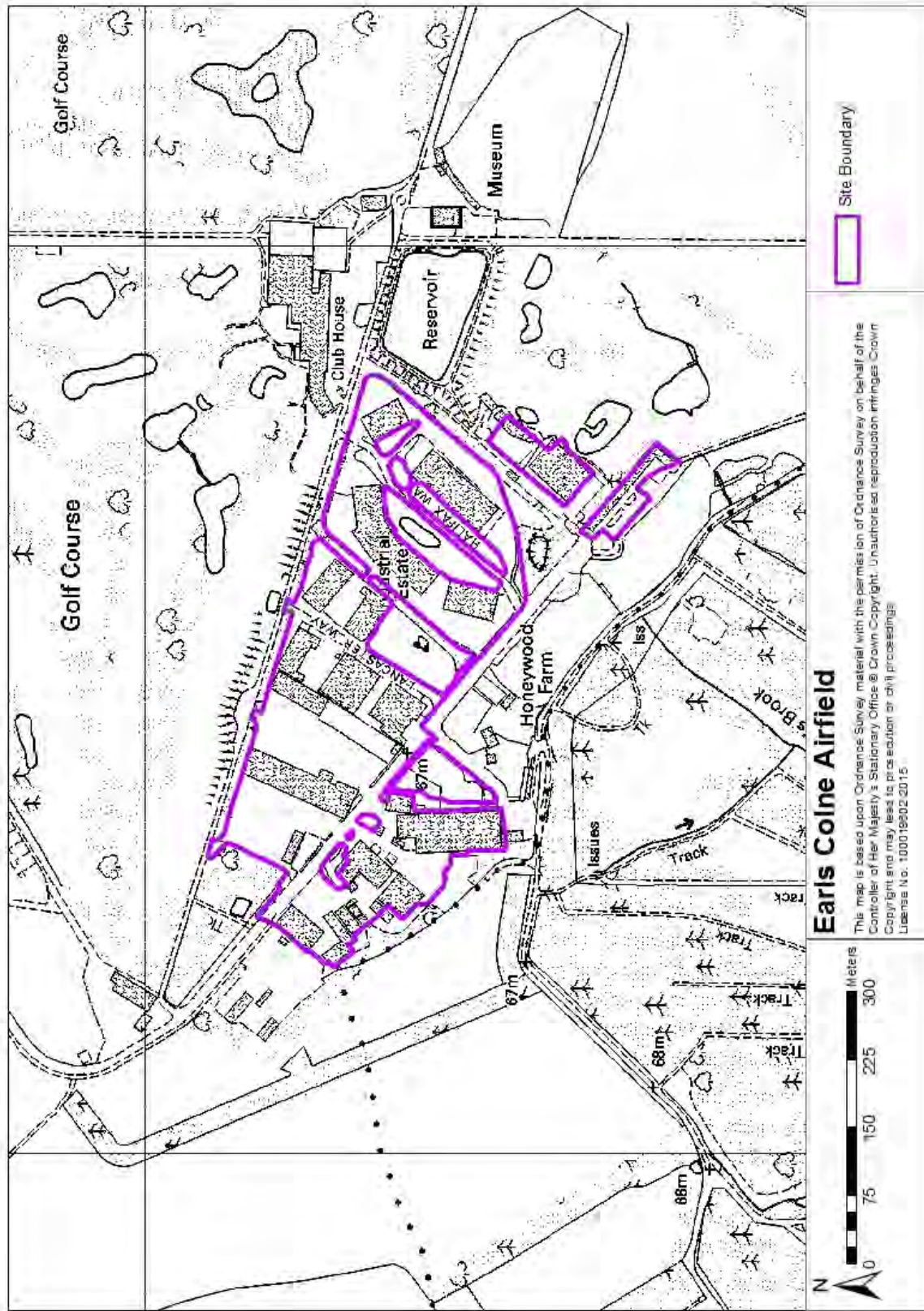


Bluebridge Industrial Estate, Braintree

Map 25 Bluebridge Industrial Estate

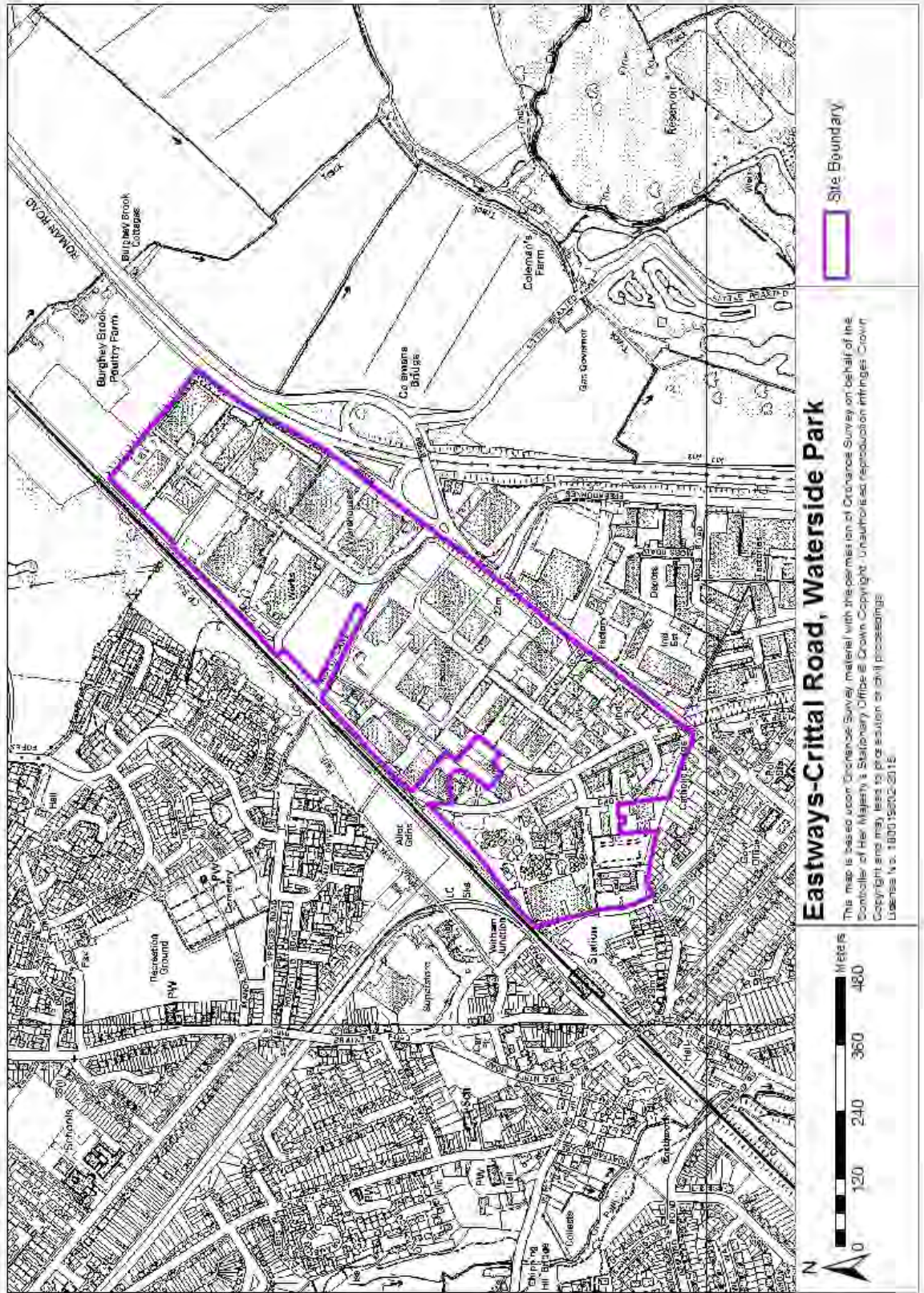


Map 26 Earls Colne Airfield



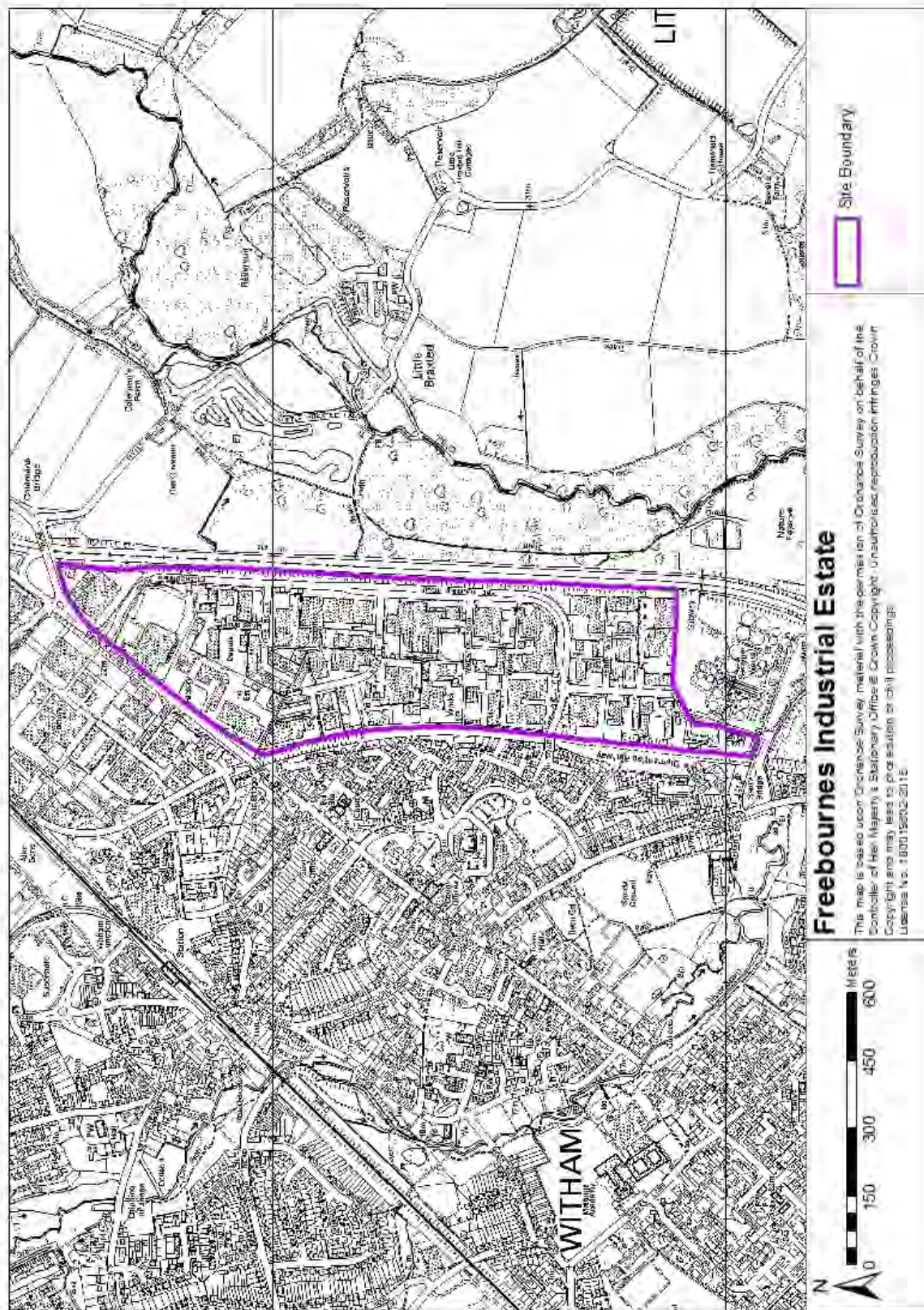
Eastways-Crittall Road, Waterside Park, Braintree

Map 27 Eastways, Crittall Road



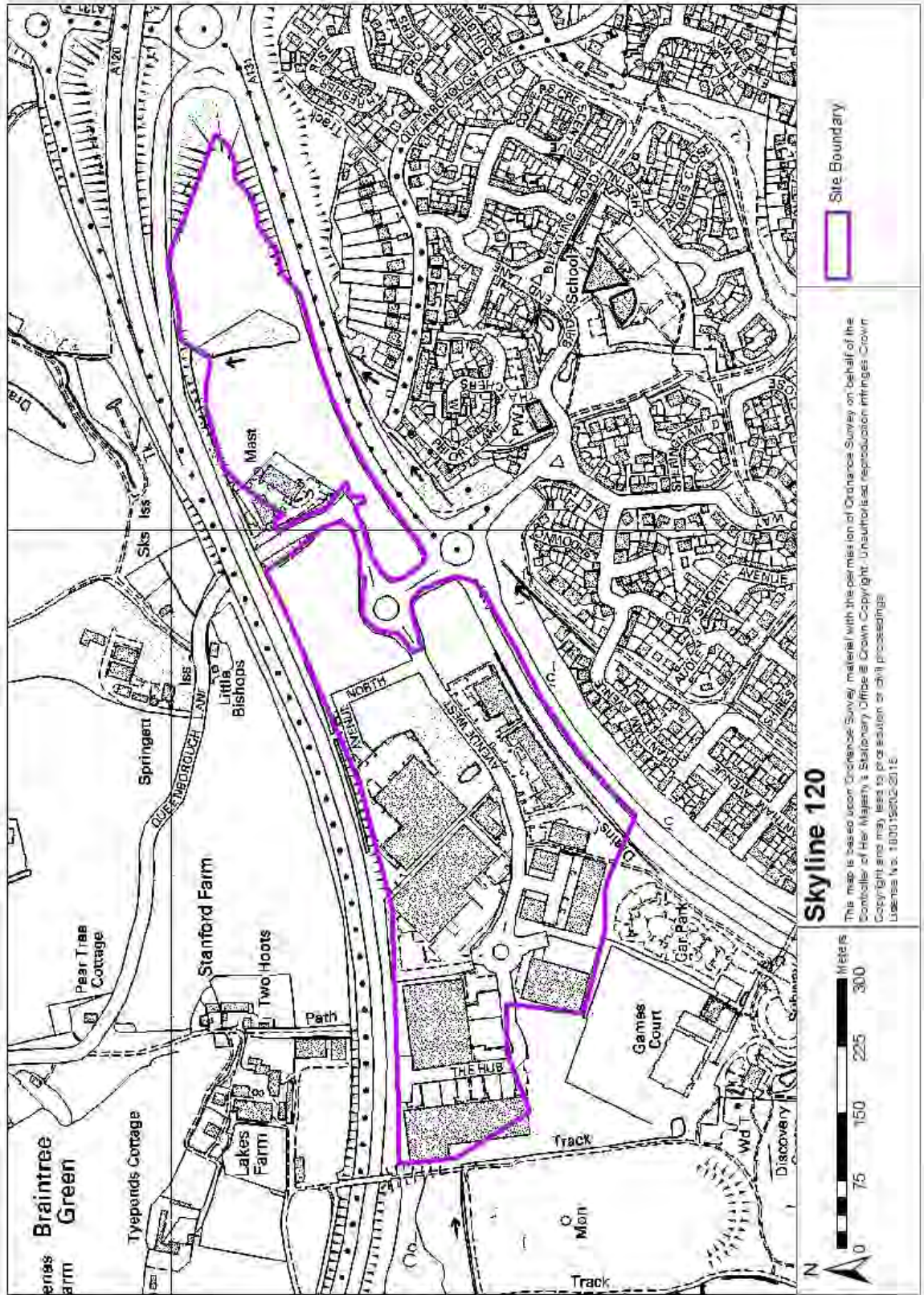
Freebournes Industrial Estate, Braintree

Map 28 Freebournes Industrial Estate



Skyline 120, Braintree

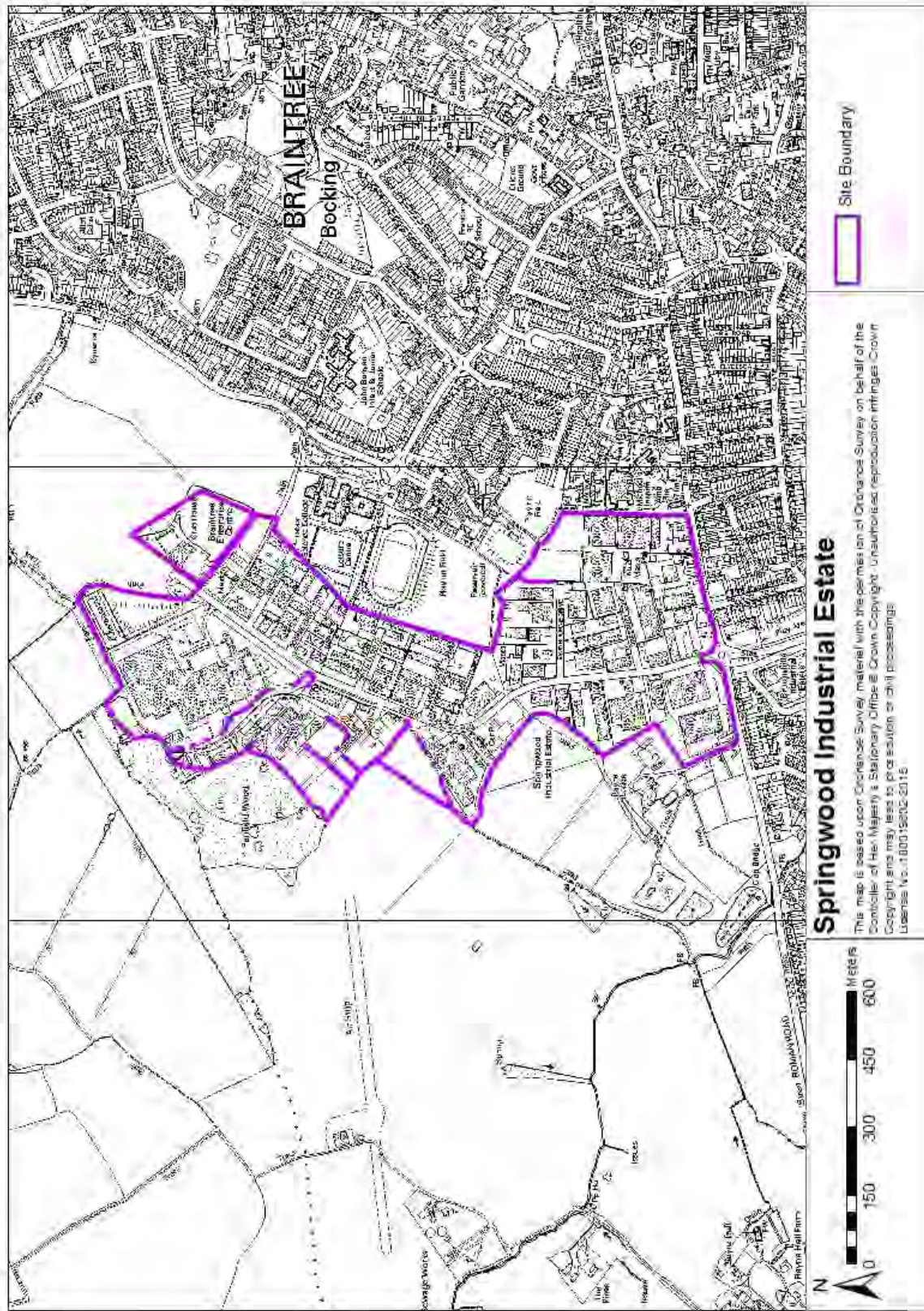
Map 29 Skyline 120



**Skyline 120**  
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Springwood Industrial Estate, Braintree

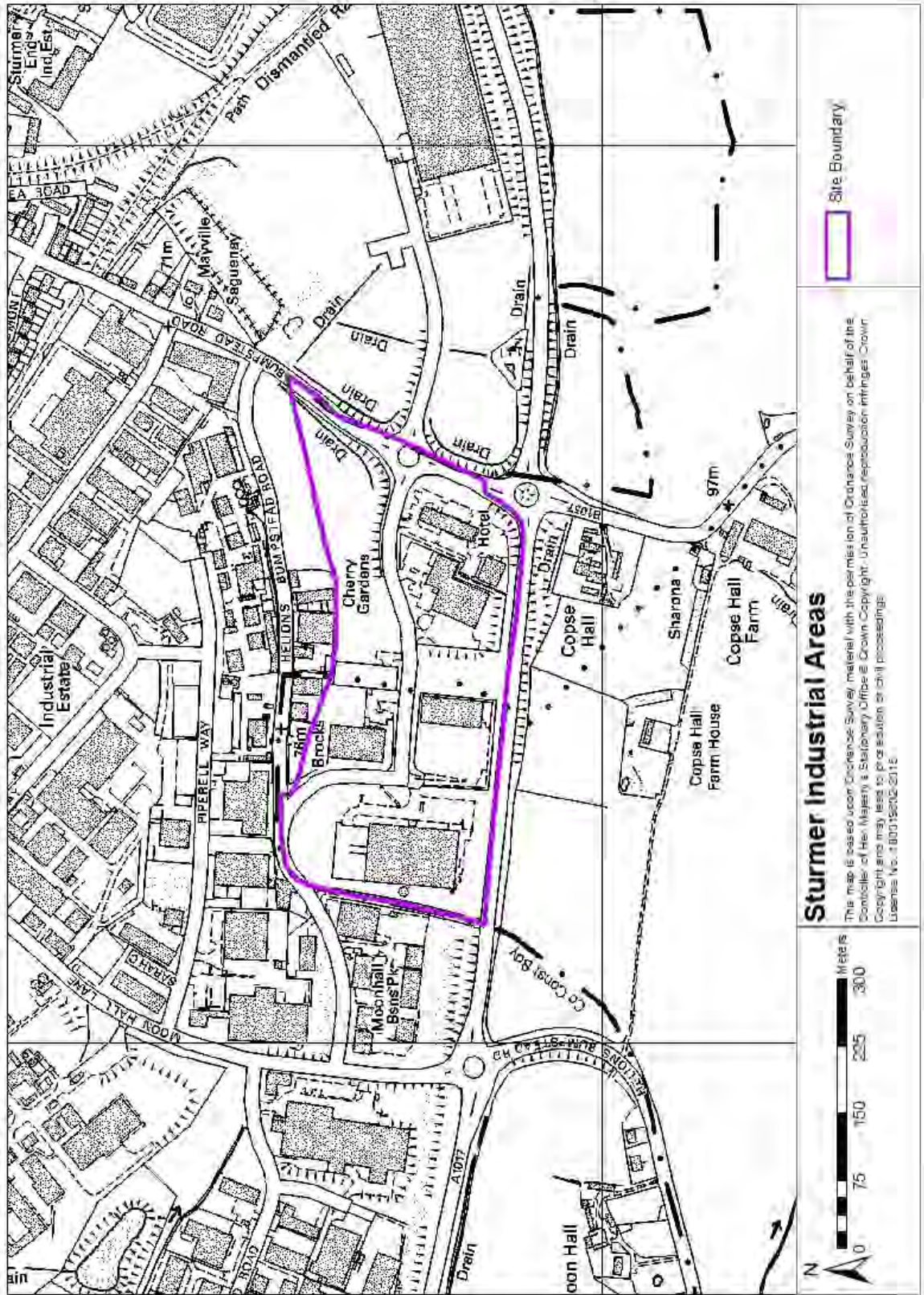
Map 30 Springwood Industrial Estate



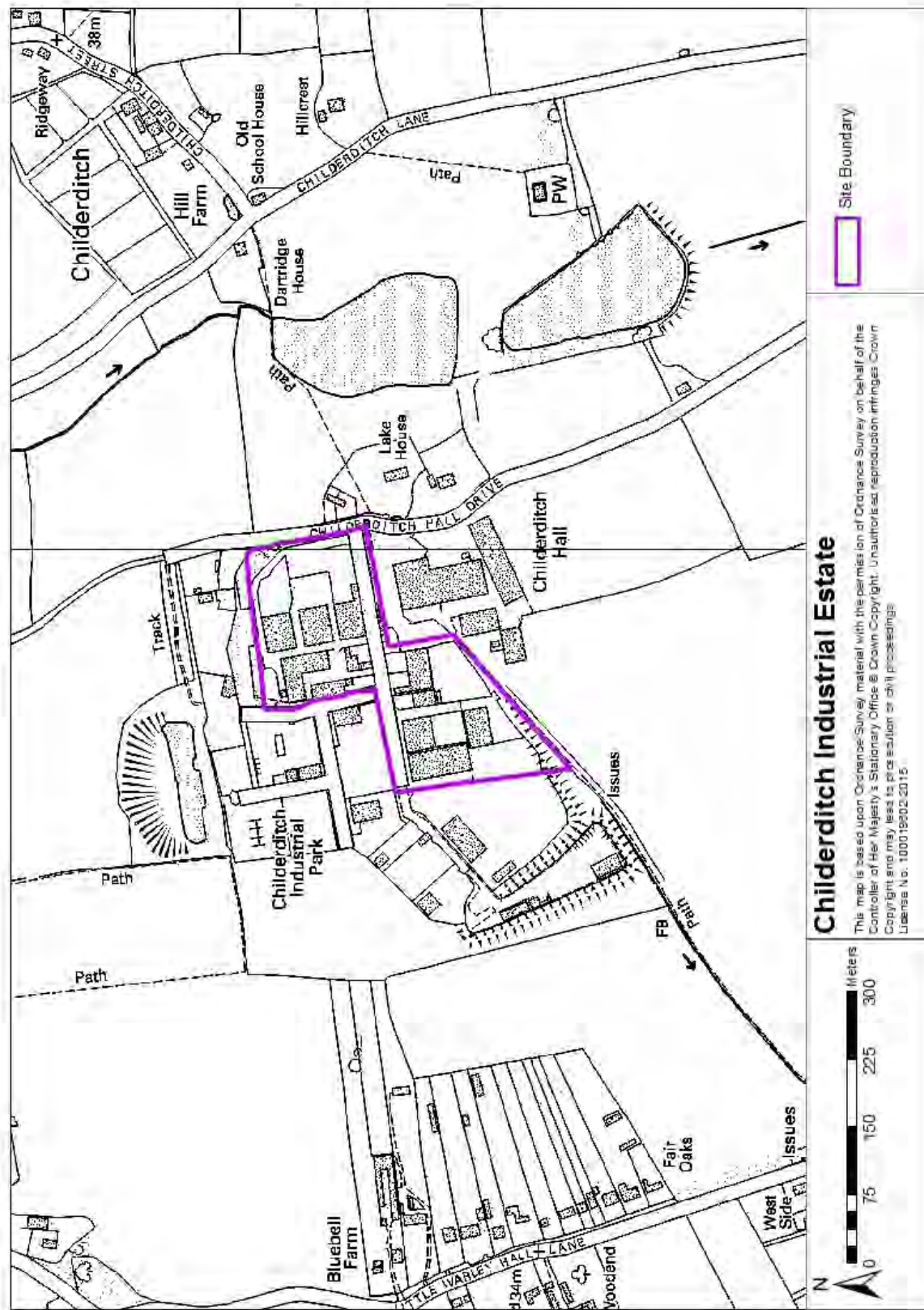


**Sturmer Industrial Area 1, Braintree**

**Map 31 Sturmer Industrial Area 1**

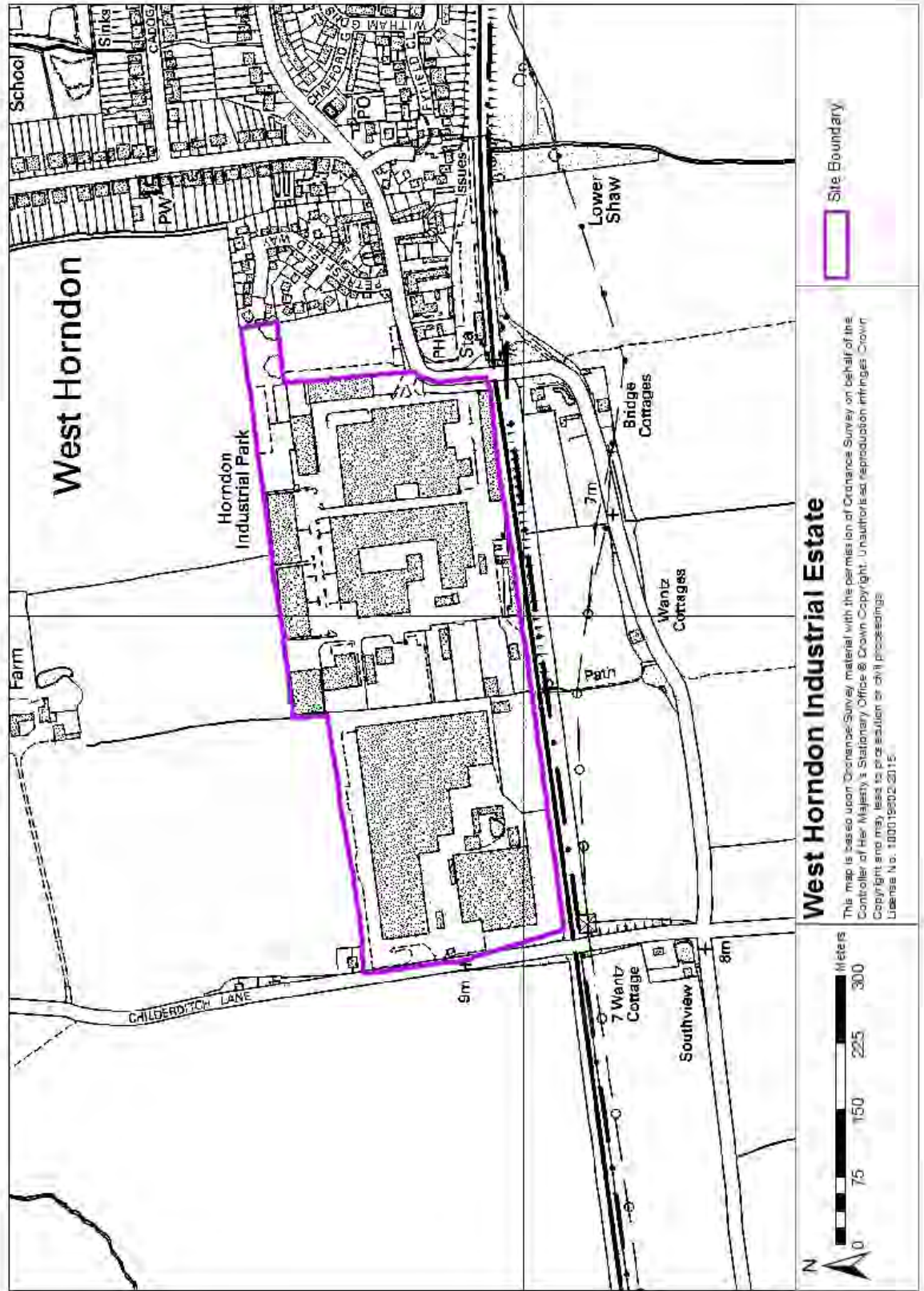


Map 32 Childerditch Industrial Estate

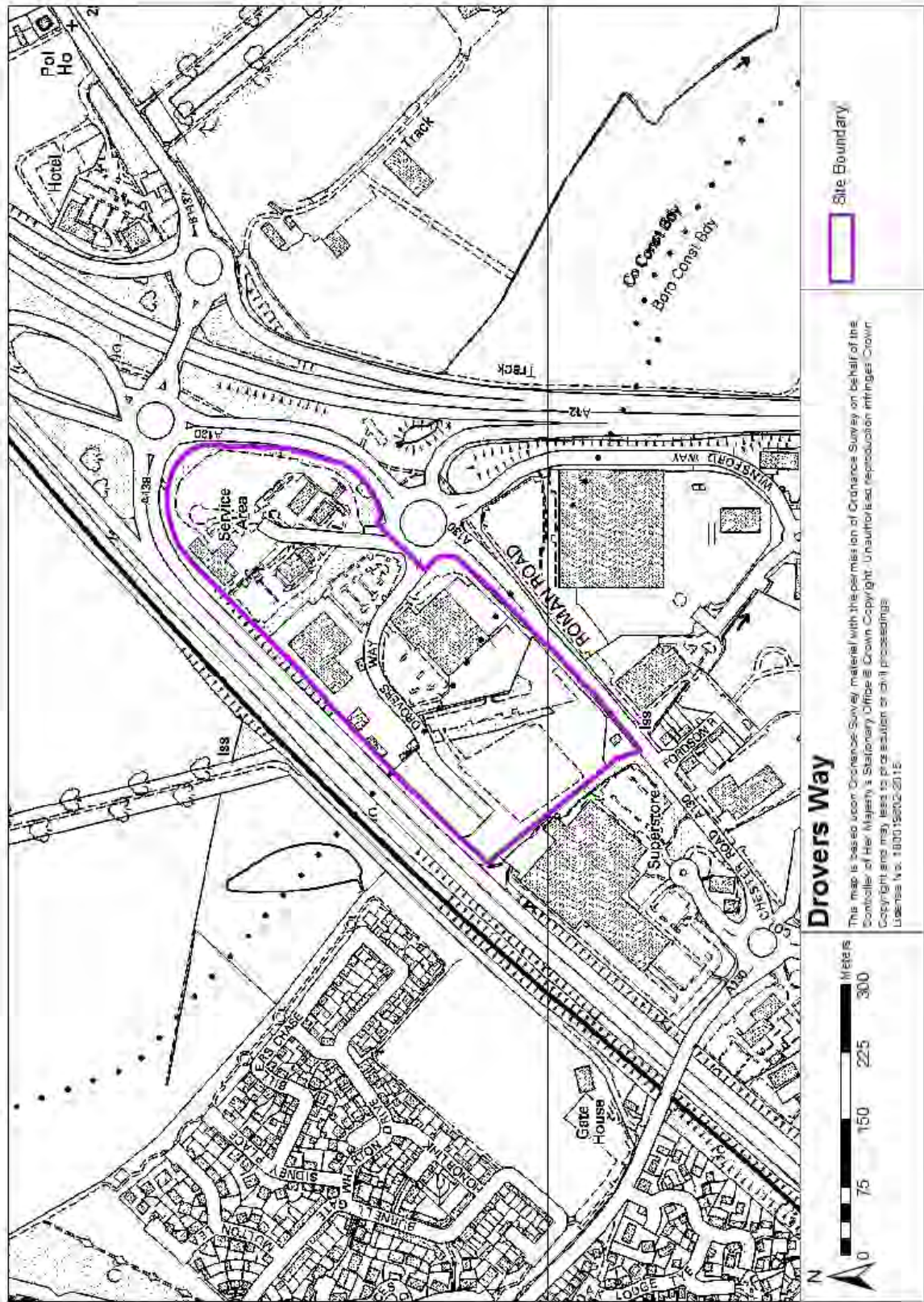


West Horndon Industrial Estate, Brentwood

Map 33 West Horndon Industrial Estate

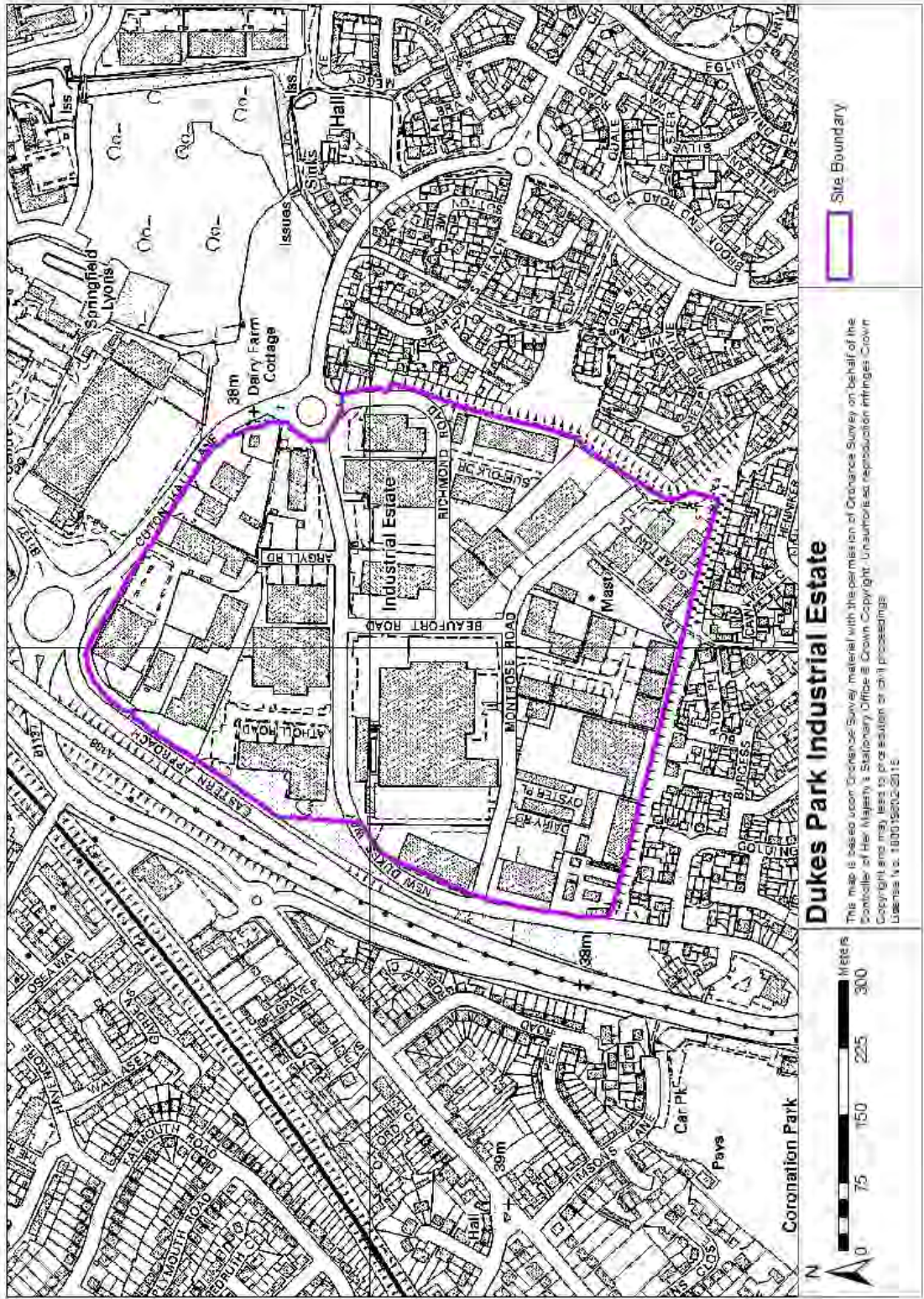


Map 34 Drovers Way



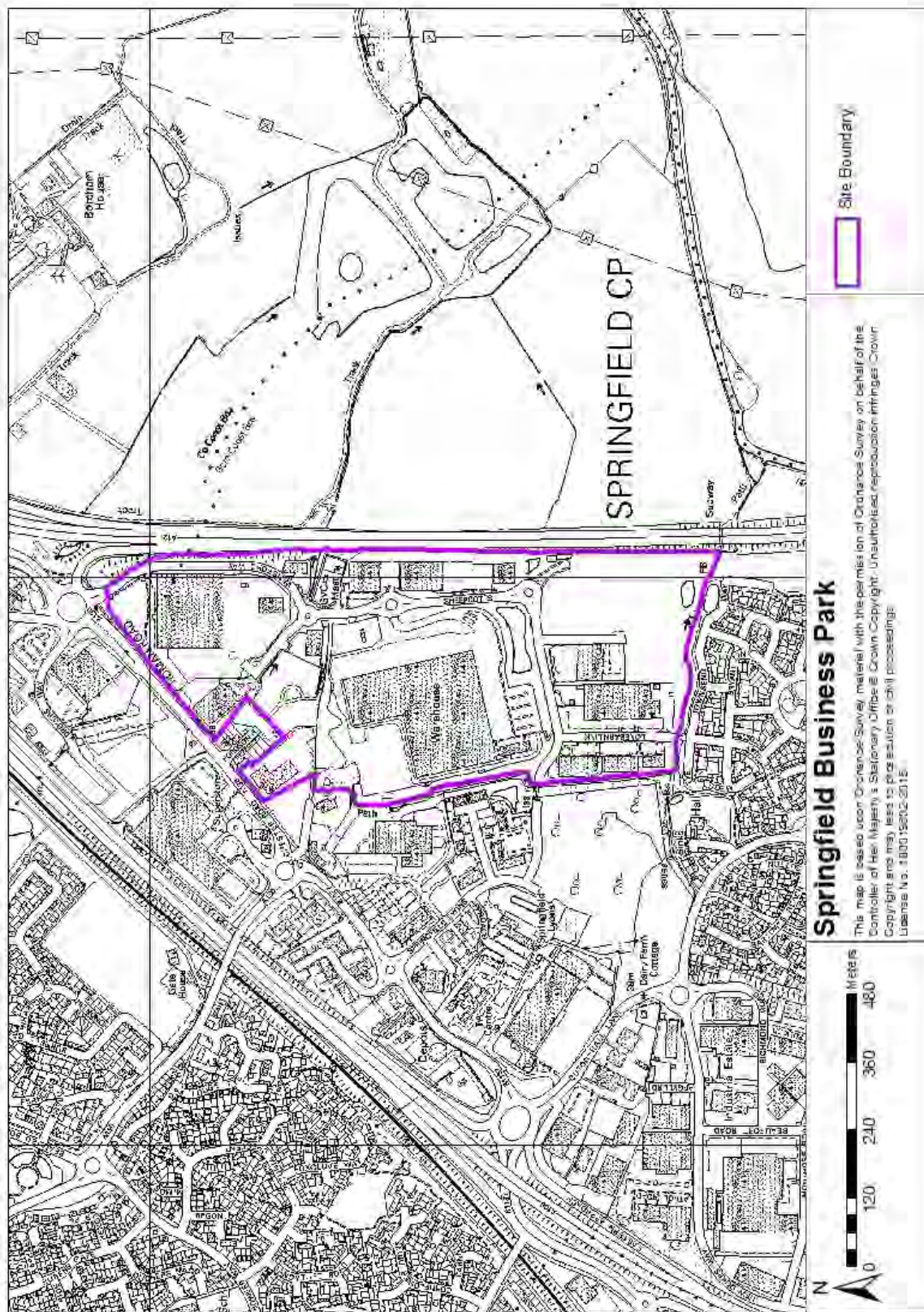
Dukes Park Industrial Estate, Chelmsford

Map 35 Dukes Park Industrial Estate



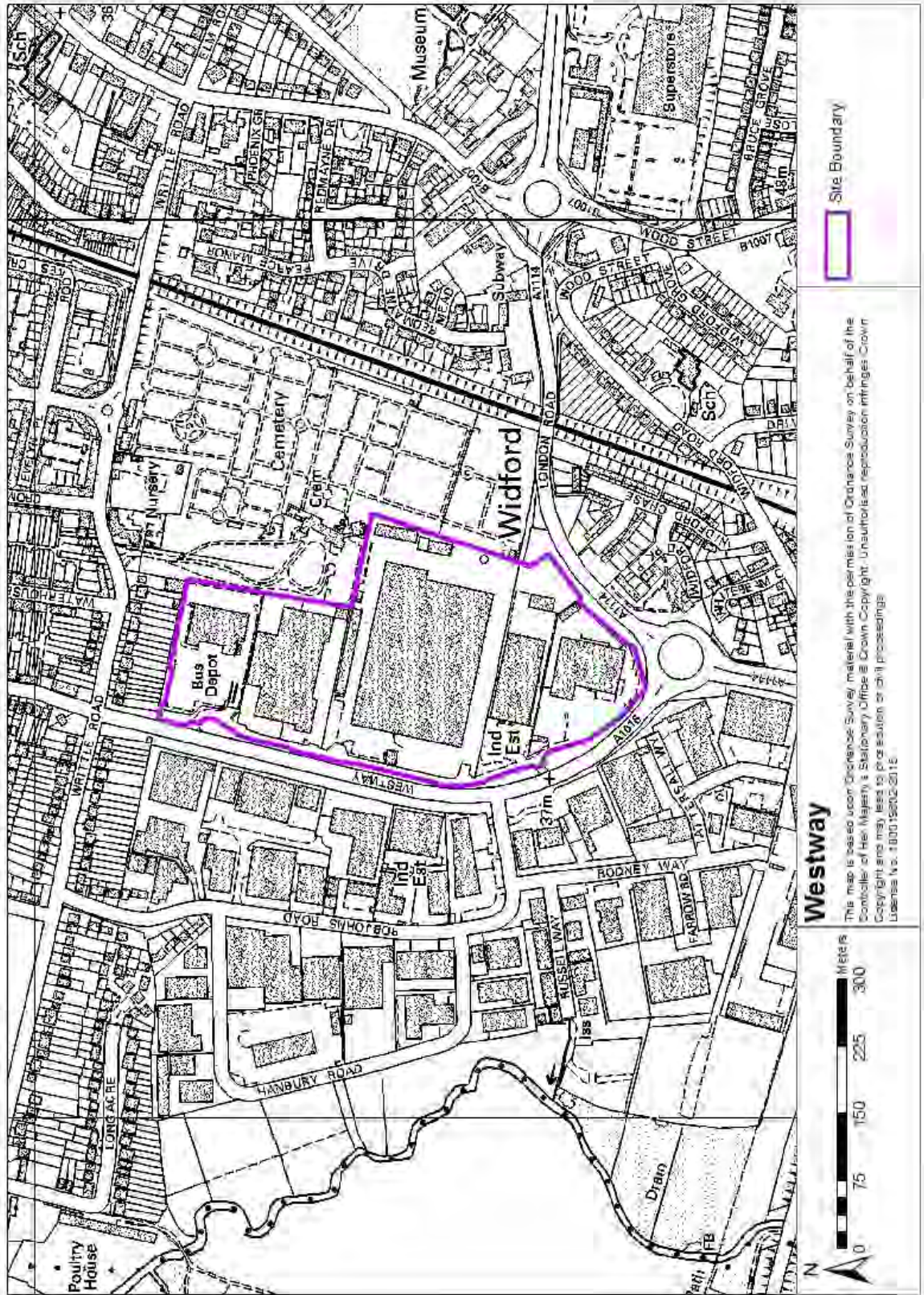
Springfield Business Park, Chelmsford

Map 36 Springfield Business Park



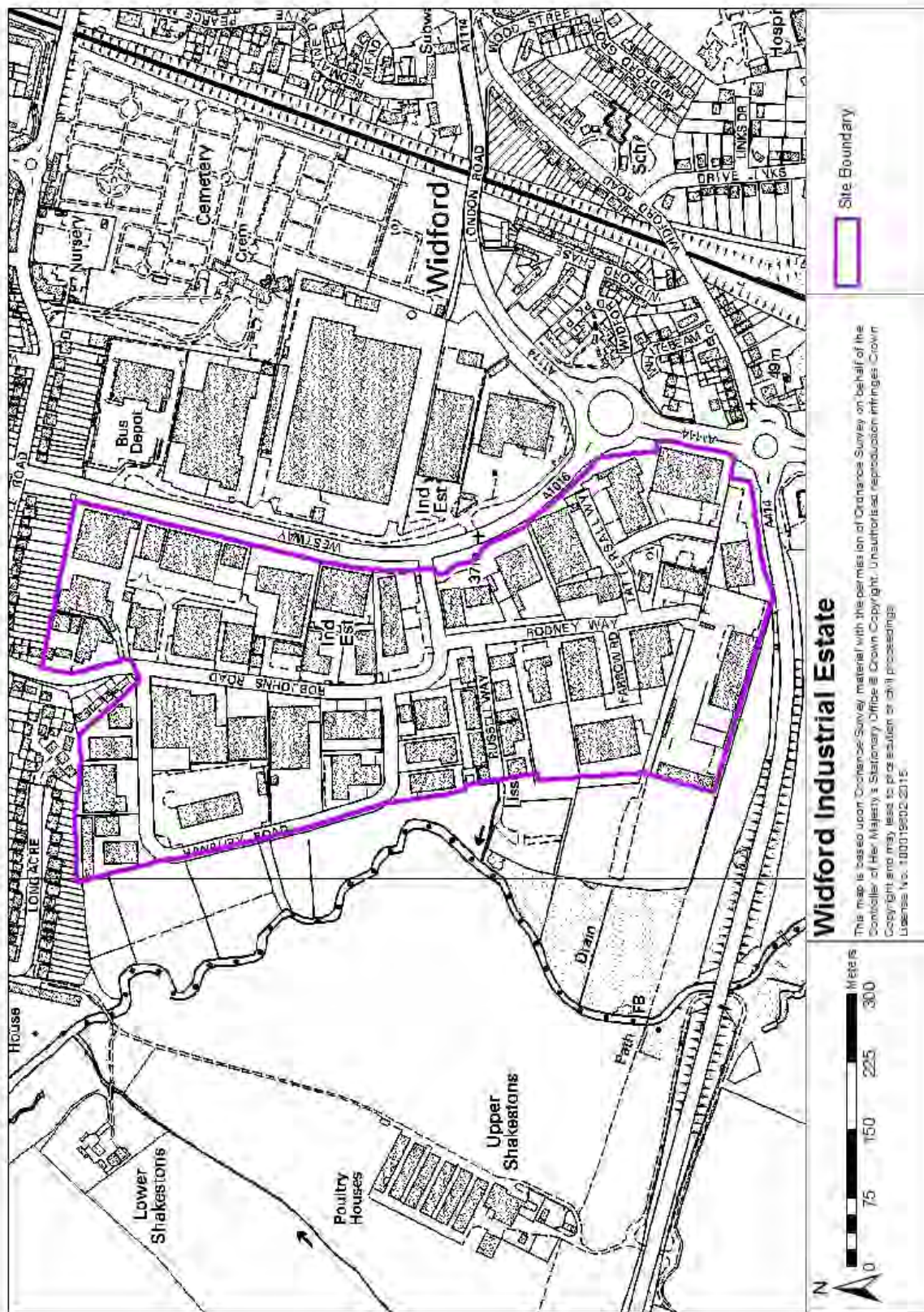
Westways, Chelmsford

Map 37 Westways



Widford Industrial Estate, Chelmsford

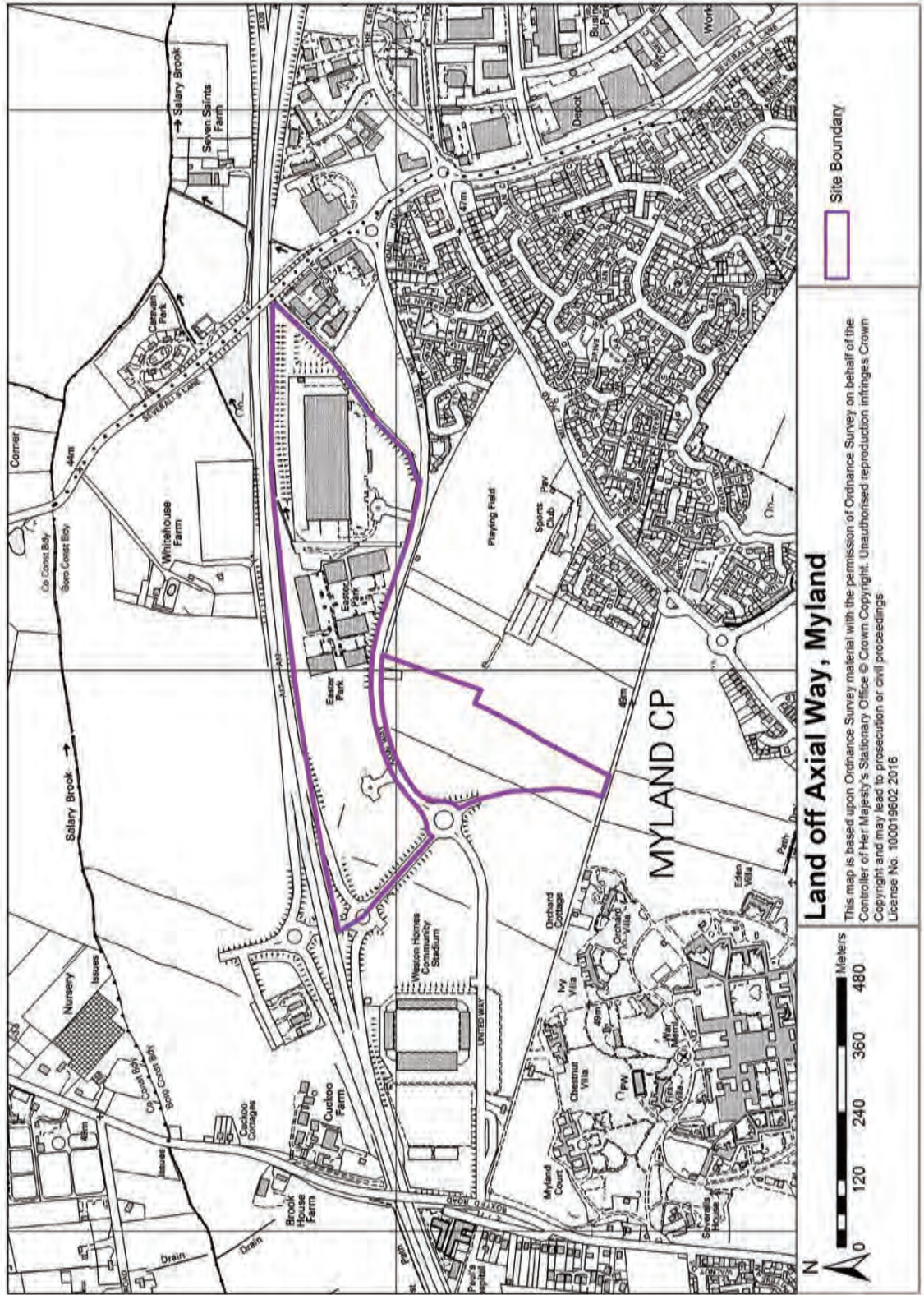
Map 38 Widford Industrial Estate



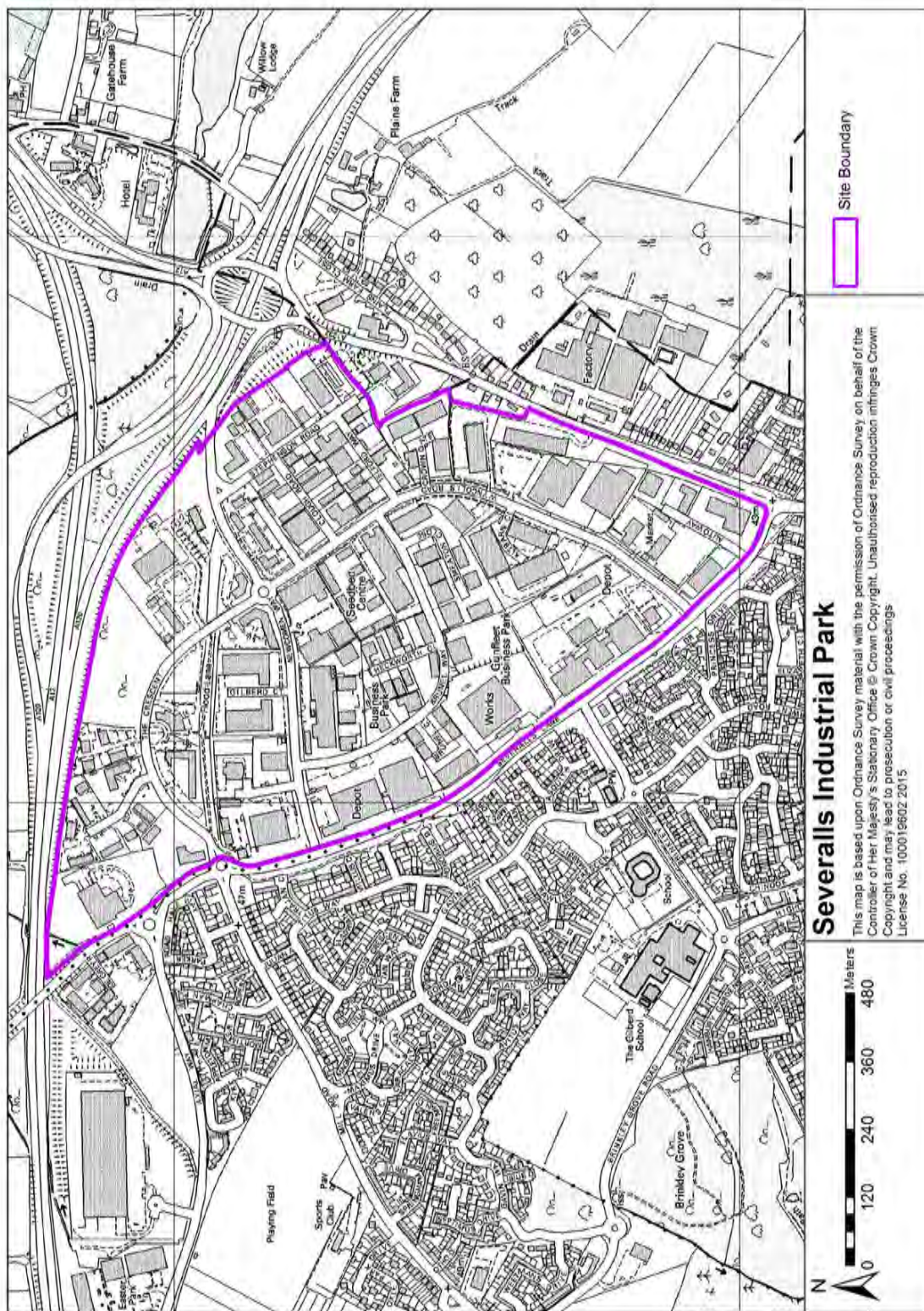


Land off Axial Way, Myland, Colchester

Map 39 Land off Axial Way, Colchester

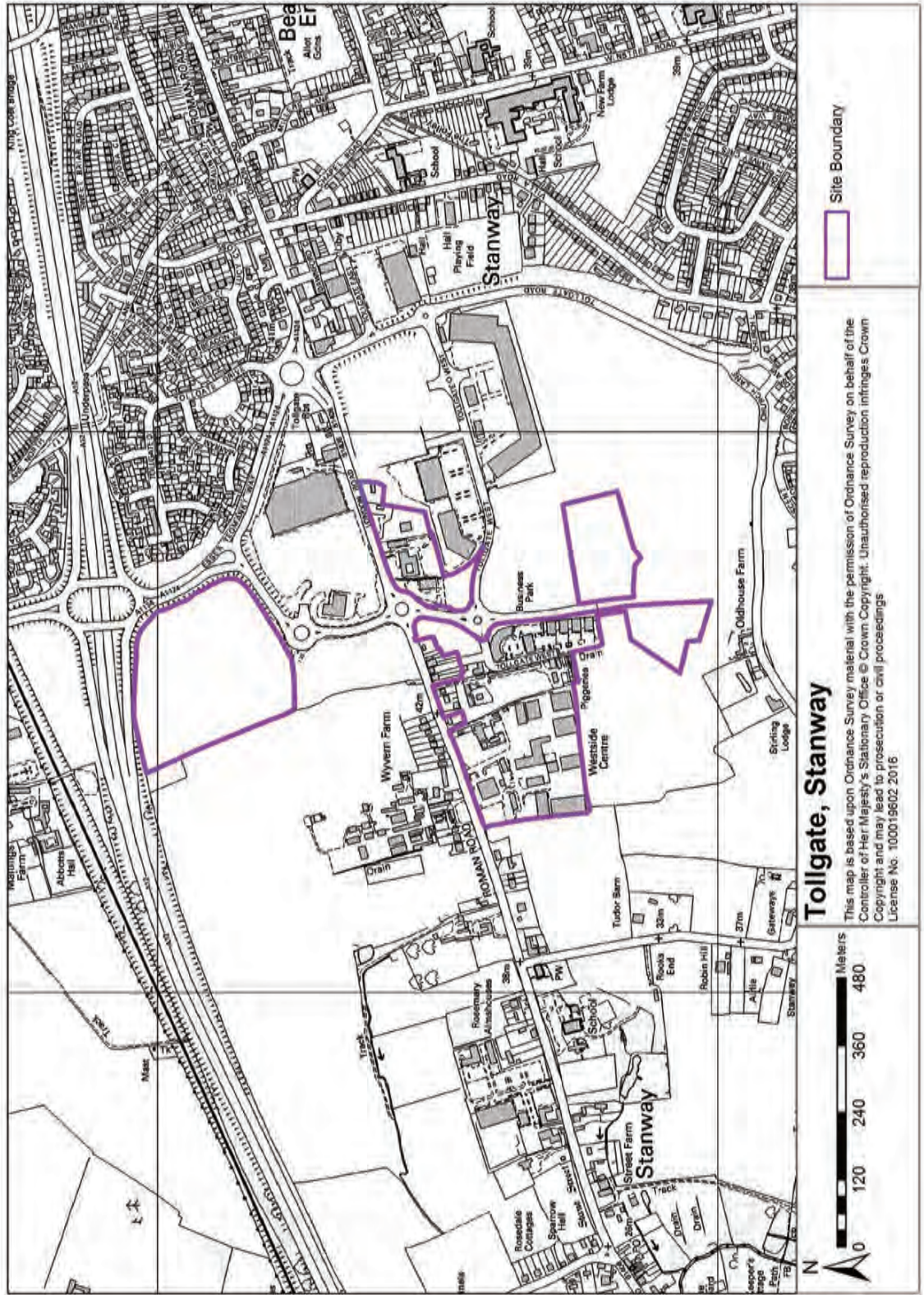


Map 40 Severalls Industrial Park



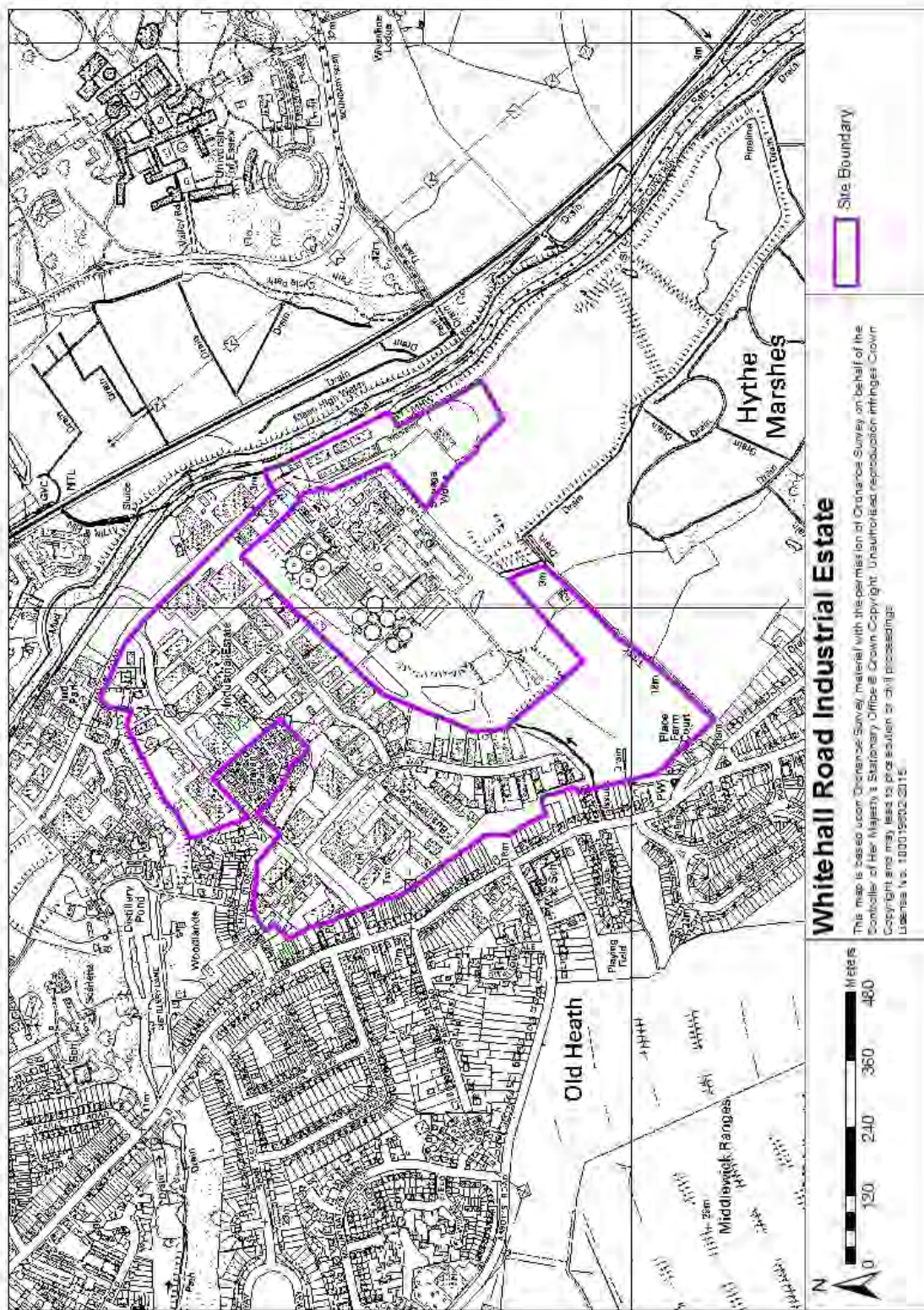
Tollgate, Stanway, Colchester

Map 41 Tollgate, Stanway, Colchester



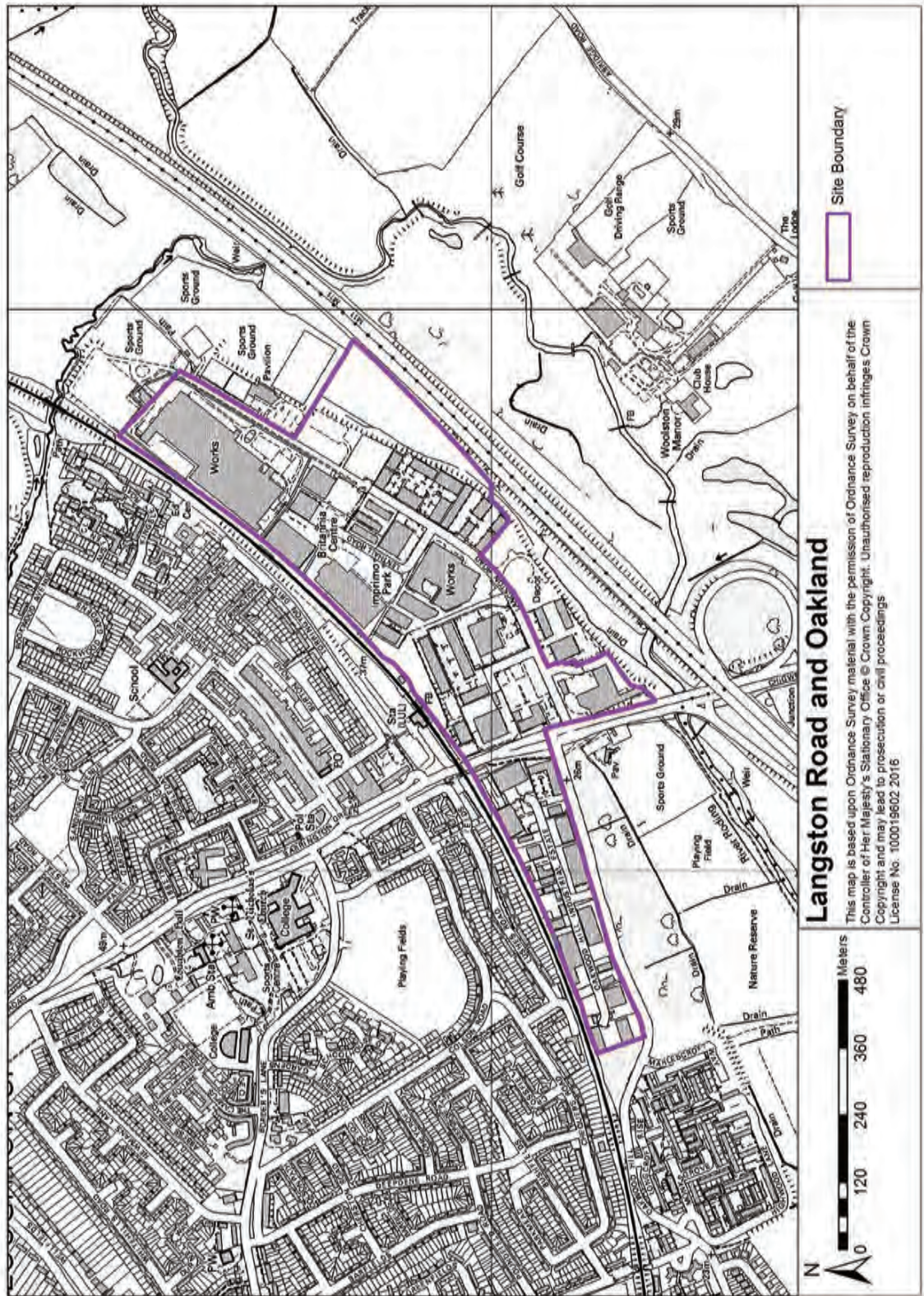
Whitehall Road Industrial Estate, Colchester

Map 42 Whitehall Road Industrial Estate



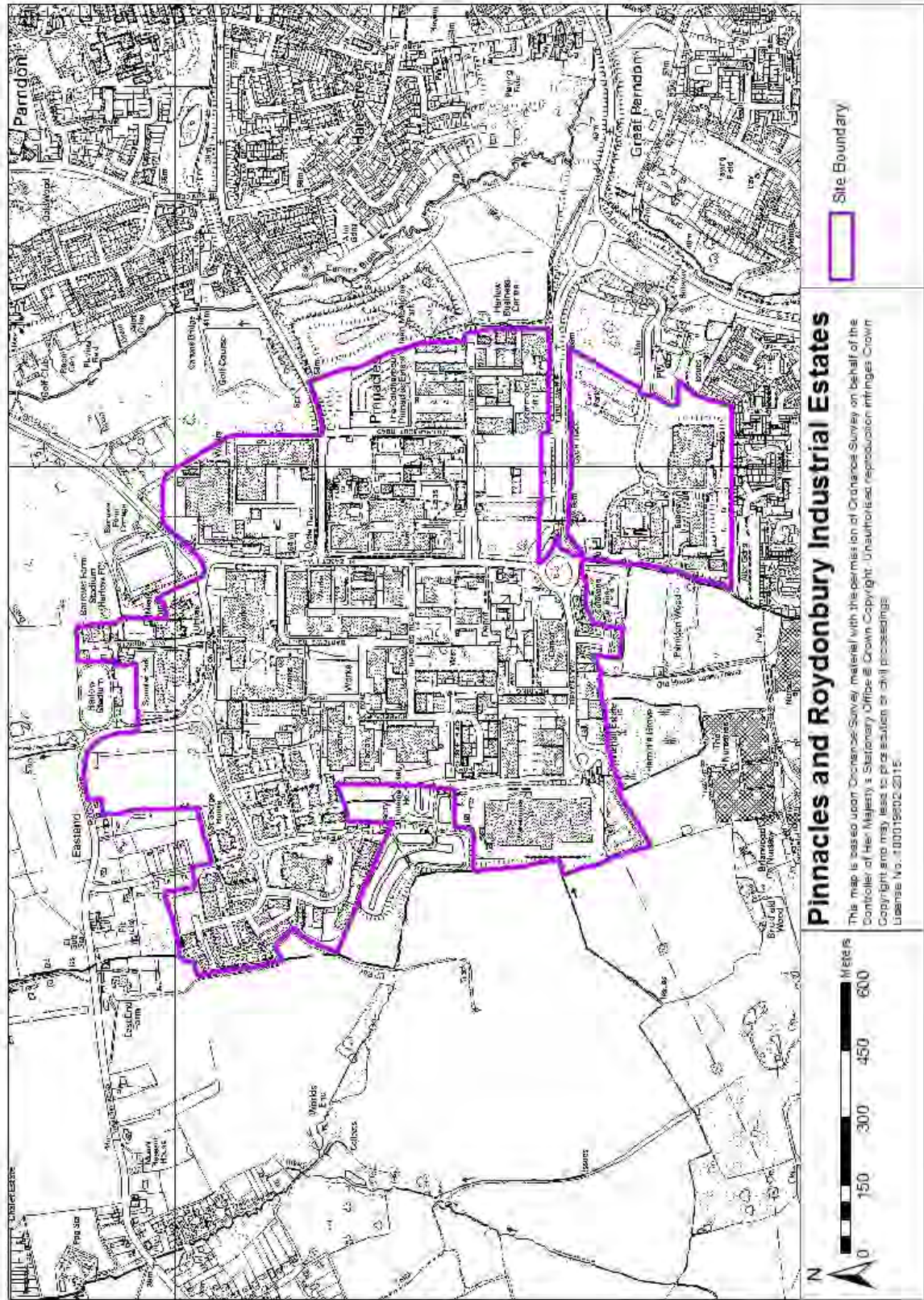
Langston Road/Oakwood Hill, Loughton, Epping Forest

Map 43 Langston Road/Oakwood Hill, Loughton, Epping Forest



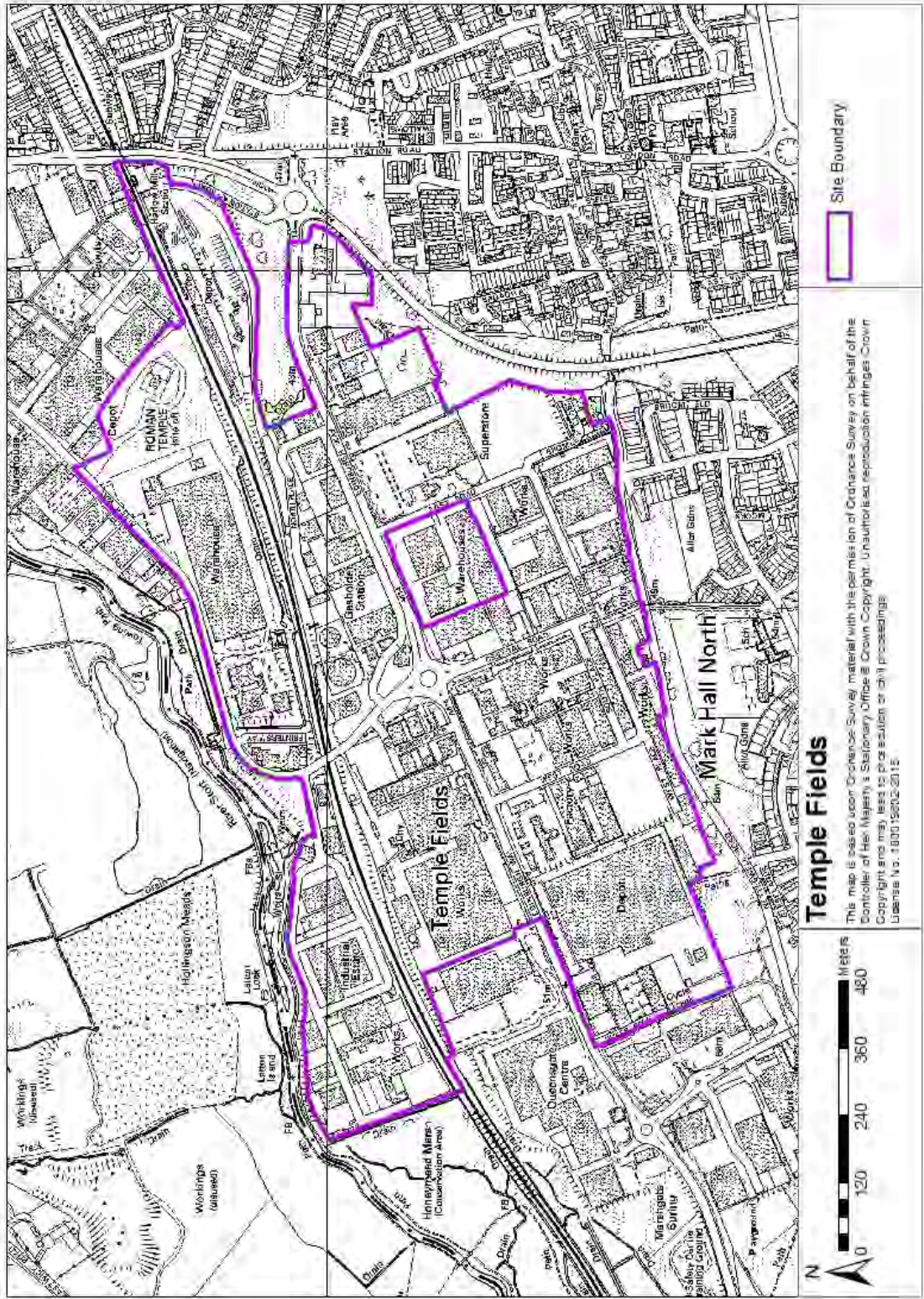
**Pinnacles and Roydonbury Industrial Estates, Harlow**

**Map 44 Pinnacles Roydonbury Industrial Estates**



Temple Fields, Harlow

Map 45 Temple Fields



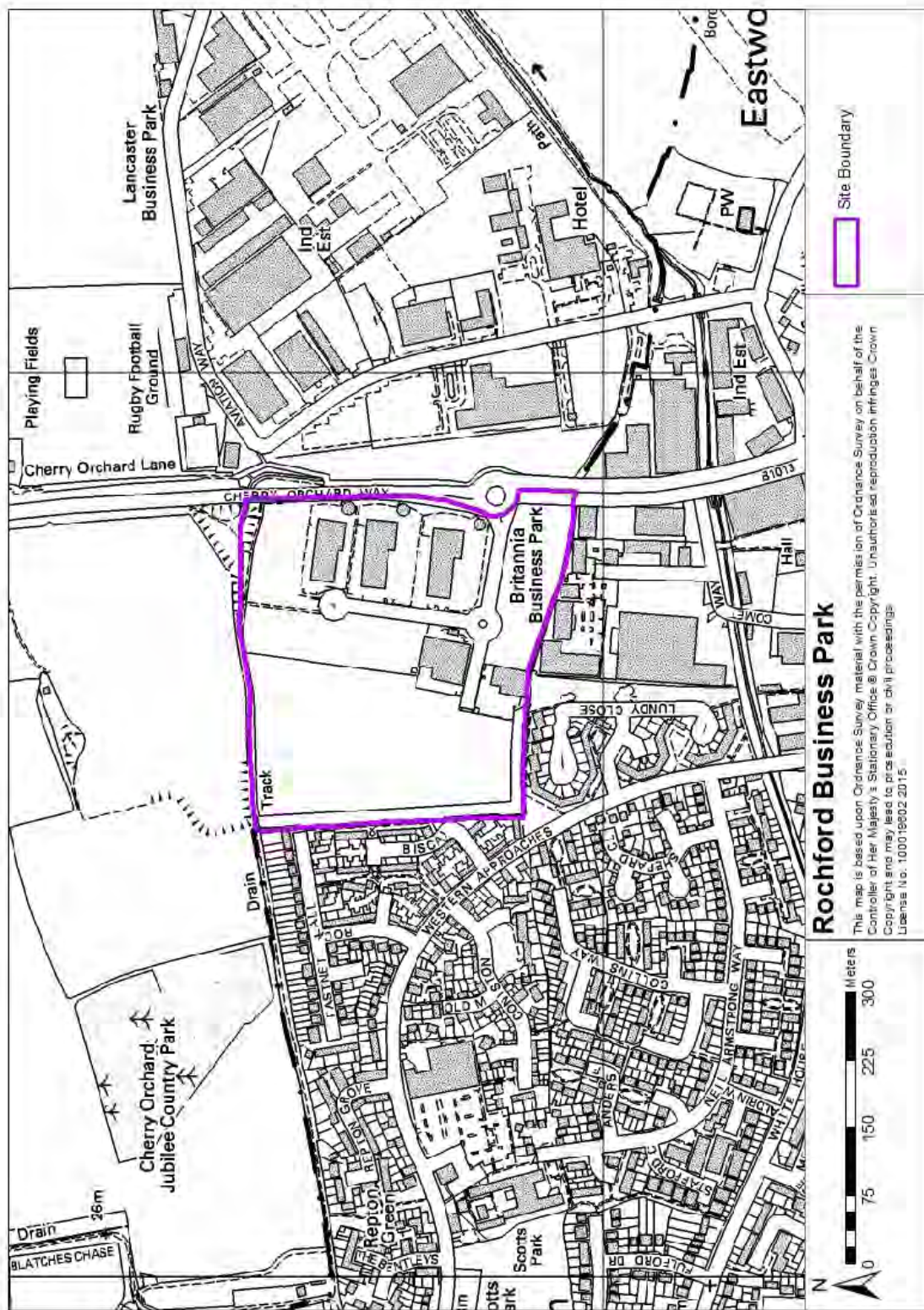
Temple Fields

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Site Boundary

Rochford Business Park, Rochford

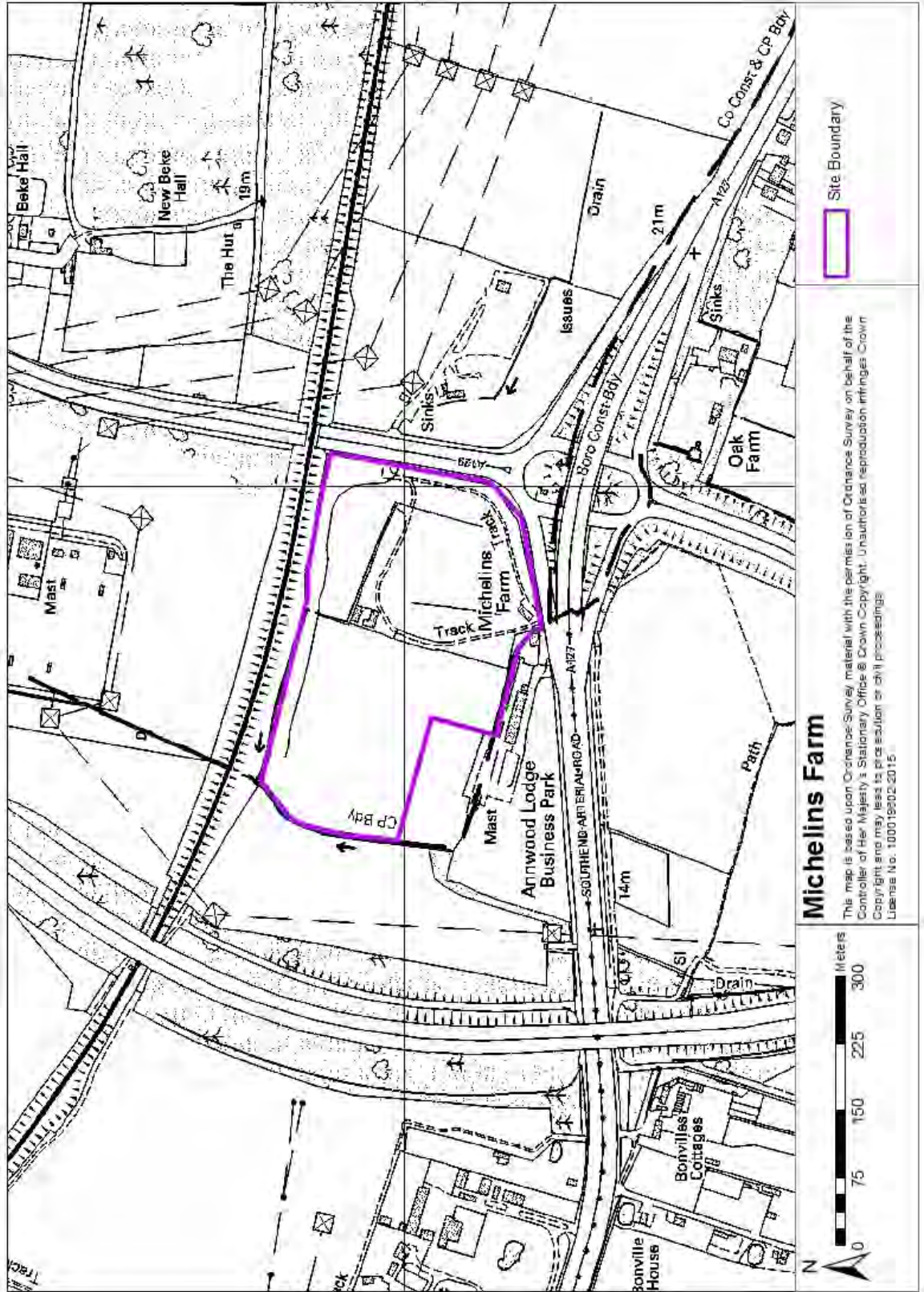
Map 46 Rochford Business Park



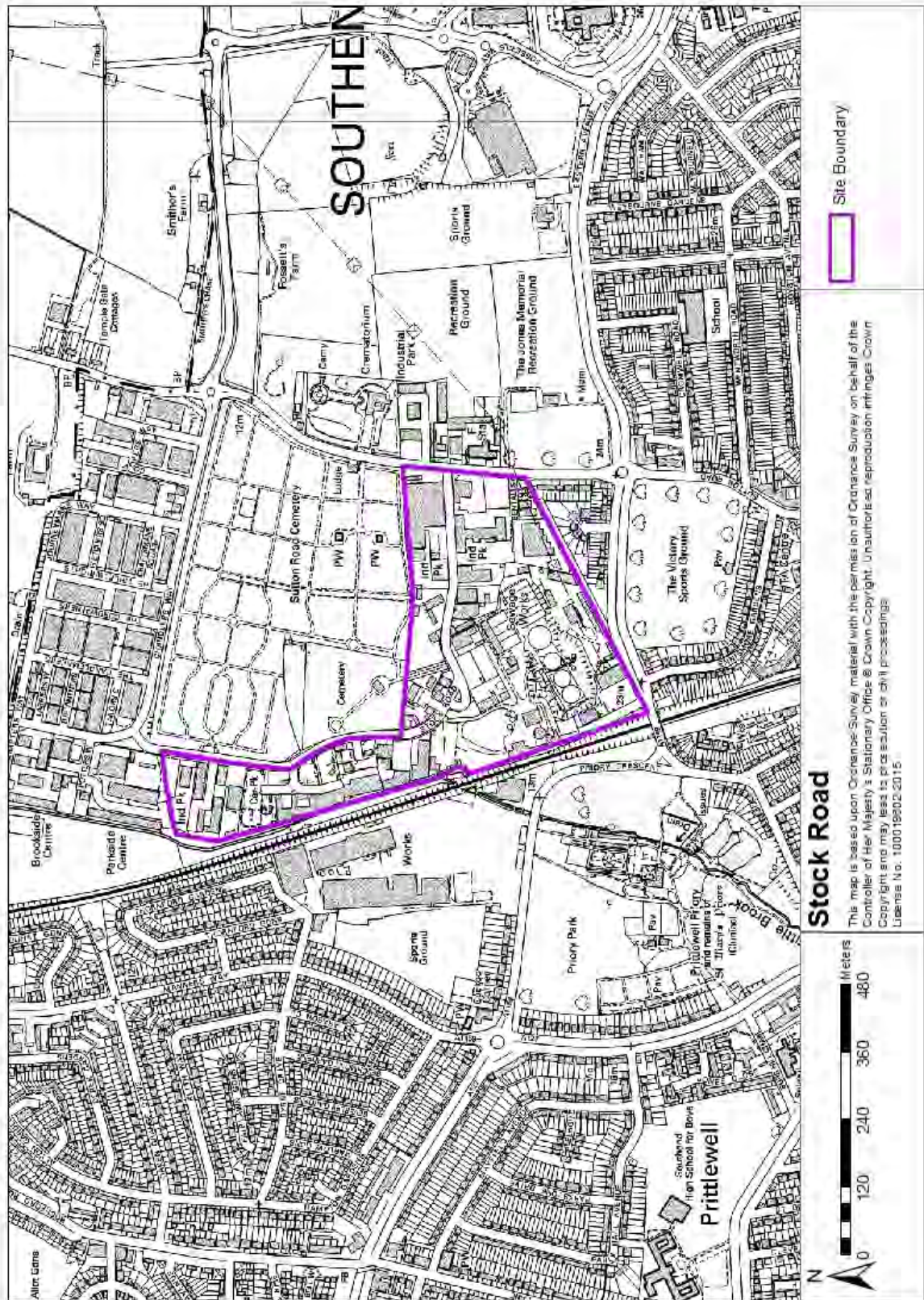


Michelins Farm, Rochford

Map 47 Michelins Farm

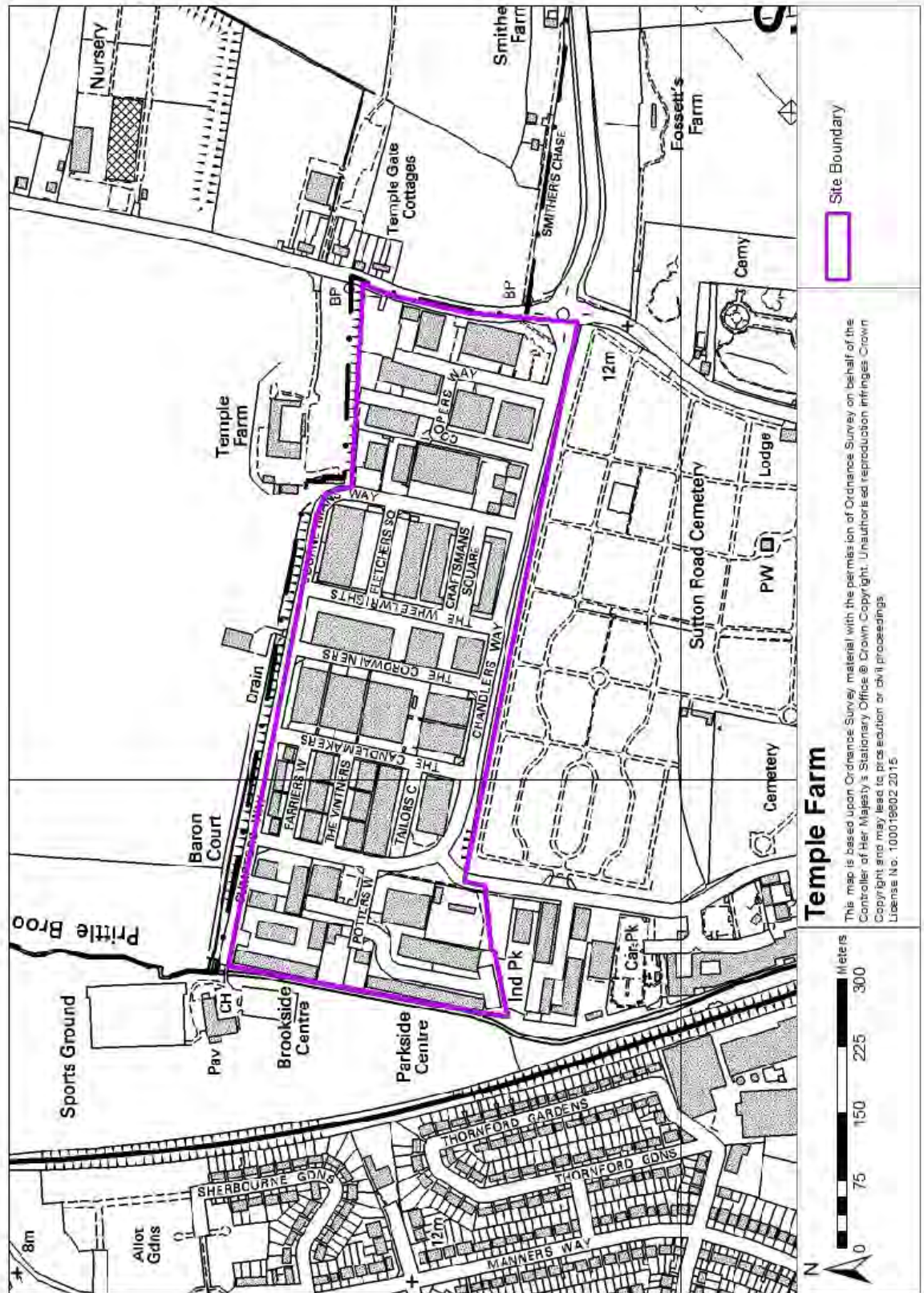


Map 48 Stock Road



Temple Farm, Southend-on-Sea

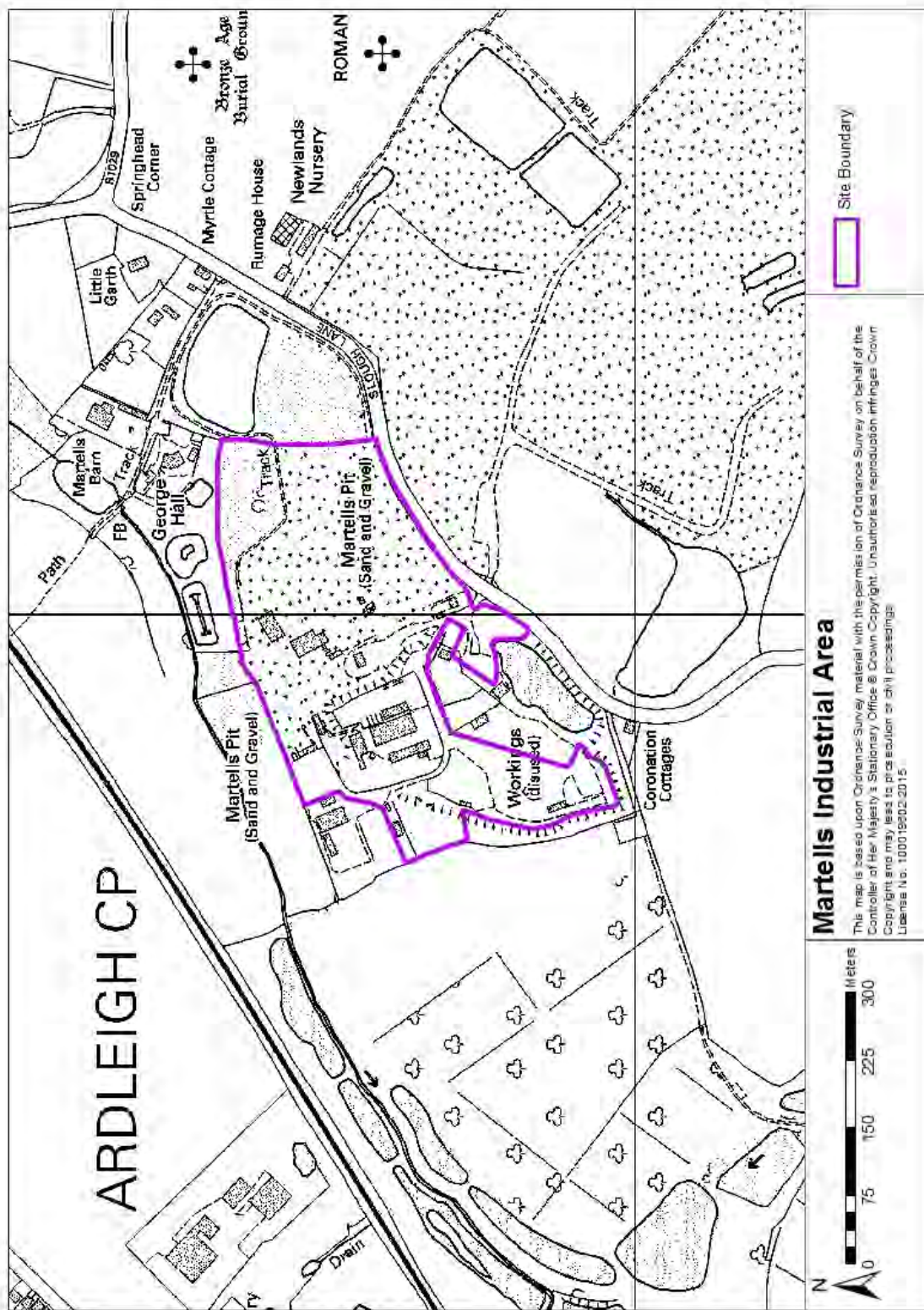
Map 49 Temple Farm



**Temple Farm**

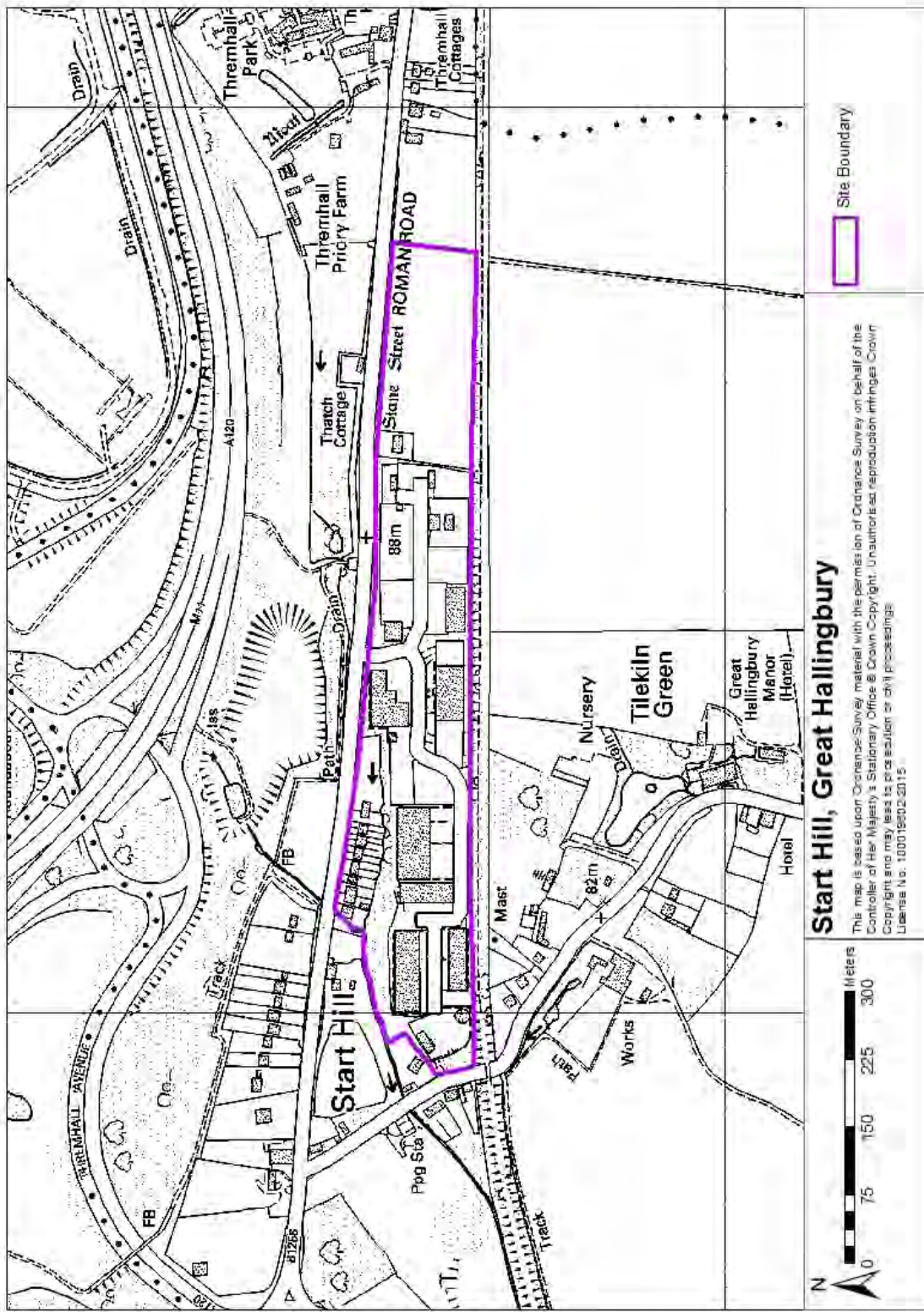
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Map 50 Martells Industrial Area



Start Hill, Great Hallingbury, Uttlesford

Map 51 Start Hill, Great Hallingbury



## Appendix F - Glossary

## F Appendix F - Glossary

Word/Phrase	Description/Definition
Agricultural Waste:	Waste that is specifically generated by agricultural activities. This includes empty pesticide containers; old silage wrap; used tyres and even surplus milk.
Amenity:	A positive element or elements that contribute to the overall character or enjoyment of an area.
Anaerobic Digestion (AD):	Biological treatment of biodegradable organic waste in the absence of oxygen. Results in the generation of biogas (rich in methane and can be used to generate heat and/or electricity), fibre (can potentially be used as a soil conditioner) and liquor (can potentially be used as a liquid fertiliser).
Area(s) of Search:	See Section 10.  Areas of Search establish where, in principle, the Waste Planning Authorities could support the development of waste facilities but are not essential to the delivery of waste capacity to meet the needs of the Plan area.
Biological Waste:	Waste that is capable of breaking down naturally, such as food and garden waste.
Brownfield Land/Sites:	Abandoned or underused industrial and commercial facilities available for re-use.
Circular Economy	The circular economy (being an alternative to a traditional linear economy of make, use and dispose) is one in which resources are kept in use for as long as possible, extracting the maximum value from them whilst in use, and then recovering and regenerating products and materials at the end of each service life.
Climate Change:	Changes in climate resulting from human activities. More specifically, human activities which have resulted in an increase in greenhouse gases in the atmosphere (e.g. emissions from transport and industry), global changes to land surface, such as from deforestation, and an increase in atmospheric concentrations of aerosols, all of which have resulted in spatially distinct climatic changes (e.g. higher average temperatures, lower rainfall rates).
Healthcare Waste:	Mainly arises from medical, dental, veterinary, pharmaceutical or similar practice, but also arises from residential or nursing homes and private households. Unless the waste is rendered safe, it may prove hazardous to any person encountering it.
Combined Heat and Power (CHP):	The use of a heat engine or power station to simultaneously generate both electricity and useful heat. Conventional power plants emit the heat created as a by-product of electricity generation into the natural

Word/Phrase	Description/Definition
	environment. In contrast, CHP captures the heat for use in domestic or industrial heating.
Commercial and Industrial waste (C&I):	Waste arising from wholesalers, catering establishments, shops and offices (in both the public and private sector), factories and industrial plants. It can include a number of materials such as food, paper, card, wood, glass, plastics and metals.
Composting:	Break down of biodegradable waste using oxygen, leaving a residue (compost), water and carbon dioxide.
Construction, Demolition and Excavation Waste (CD&E):	Arises from the construction, repair, maintenance and demolition of buildings and structures and the excavation of sites. It mostly includes brick, concrete, hard core, subsoil and topsoil, but can include timber, metal, plastics and occasionally special hazardous waste materials.
Controlled Wastes:	Household, industrial and commercial wastes, the deposition, recovery and disposal of which are subject to the licensing system established through the Environmental Protection Act (1990). There are exemptions from the requirement for a licence (e.g. individuals depositing personal garden waste), and these are detailed in the Controlled Waste Regulations (1992).
Core Strategy:	The central strategy of a Local Plan, setting out the key drivers and policy approaches relevant to the local area.
Development Management:	The process whereby a Local Planning Authority receives and considers the merits of a planning application and whether it should be given permission having regard to the development plan and all other material considerations.
Development Plan Document (DPD):	Development Plan Documents are prepared by local planning authorities and outline the key development goals of the local development framework. They include the core strategy, site-specific allocations of land and, where needed, area action plans. There will also be an adopted proposals map which illustrates the spatial extent of policies that must be prepared and maintained to accompany all DPDs.
Employment Land:	Land allocated by local planning authorities for industrial and business use.
Energy from Waste Facility:	A facility which burns waste material at high temperatures, directly releasing the energy in the waste. The heat energy from the combustion can be recycled and use to heat buildings such as factories. Alternatively, electricity or a combustible fuel, such as methane or ethanol, can be produced from the combustion process.
Examination in Public:	The method of considering public views on a local development plan document, or proposed changes to it.



Word/Phrase	Description/Definition
Gasification and Pyrolysis Facility:	Treatment of organic waste at high temperatures in conditions of limited or no oxygen to produce a mixture of gaseous and liquid fuels and a solid inert residue (mainly carbon).
Greenhouse Gas:	Gases that contribute to climate change. Naturally occurring examples include water vapour, carbon dioxide, methane, nitrous oxide and ozone. Some human activities increase these gases, including fossil fuel combustion within motor vehicles and some power stations.
Hazardous Waste:	Waste that poses substantial or potential threats to public health or the environment (when improperly treated, stored, transported or disposed). This can be due to quantity, concentration, or characteristics of the waste. Hazardous waste possesses one or more hazardous properties, as detailed in the Hazardous Waste Directive, for example explosive, oxidising, highly flammable, irritant etc.
Inert Waste:	Inert waste is that which is neither chemically or biologically reactive and will not decompose (e.g. sand and concrete).
Inspector's Report:	A report issued by a Planning Inspector regarding the planning issues debated at the independent examination of a development plan or a planning inquiry.
Integrated Waste Management Facility (IWMF):	A facility that incorporates a number of individual elements that work together to effectively process waste. For example, an IWMF could include recycling, paper pulping and energy from waste capabilities.
In-Vessel Composting:	Composting that is undertaken in enclosed reactors (e.g. metal tanks or concrete bunkers) to allow for a greater degree of control of the process, such as through regulating airflow and temperature.
Issues and Options:	The first "pre-submission" consultation stage on Development Plan Documents with the objective of gaining public consensus over proposals prior to submission to government for independent examination.
Joint Municipal Waste Management Strategy:	These strategies set out a strategic framework for the management of municipal waste, jointly developed and subscribed to by the waste collection authorities and waste disposal authority in an area.
Landfill:	A landfill is a disposal method for waste. These are sites where local authorities and industry can take waste to be buried and compacted with other wastes. The Environment Agency licenses and regulates landfill sites to ensure that their impact on the environment is minimised. These can be specifically for inert waste, non-hazardous waste and/or hazardous waste.
Landraise:	Also generically referred to as landfill, refers to waste disposal that occurs above pre-existing ground levels.

Word/Phrase	Description/Definition
Local Plan (or Local Development Framework (LDF)):	The Local Plan provides the essential framework for planning in the local authority's area.
Local Enterprise Partnership (LEP):	Local enterprise partnerships are partnerships between local authorities and businesses. They decide what the priorities should be for investment in roads, buildings and facilities in the area. The plan area is covered within the South East LEP comprising Kent, Medway, Southend, Thurrock and Essex.
Local Authority Collected Waste (LACW):	Includes household waste and any other waste collected by waste collection authorities (or their agents) such as municipal parks and garden waste, commercial or industrial waste and waste resulting from the clearance of fly tipped material. It can include a number of materials such as food, paper, card, wood, glass, plastics and metals.
Low Level Radioactive Waste (LLW):	A by-product of certain industrial and commercial processes, such as contaminated equipment and protective clothing from the nuclear industry, research and medicine; soil and rubble from the decontamination and decommissioning of nuclear sites; and residues from industrial processing of some minerals.
Materials Recycling Facility (MRF):	A facility for sorting, separating and packing or baling recyclable materials into individual materials prior to reprocessors who wash and prepare the materials for manufacturing into new recycled products. MRFs can also be referred to as materials recovery or reclamation facilities.
Mechanical Biological Treatment Facility (MBT):	A facility containing a hybrid treatment process that uses both mechanical and biological techniques to sort and separate mixed waste.
National Planning Policy Framework (NPPF):	The National Planning Policy for Waste was published on 16th October 2014, and sets out detailed waste planning policies, to achieve this aim. This encompasses the Government's ambition is to work towards a more sustainable and efficient approach to resource use and management.
National Planning Practice Guidance for Waste:	The National Planning Practice Guidance for Waste provides further information in support of the implementation of the waste planning policy. Contains various documents surrounding the preparation, identification, implementation, and management of local waste plans.
Net Self-Sufficiency:	A principle resulting in the provision of waste management capacity equivalent to both the amount of waste arising and requiring management in the Plan area, whilst respecting this waste will travel across administrative boundaries. For the purposes of the Waste Local Plan, the principal will not be applicable to all waste types, specifically excluding hazardous and radioactive waste.

Word/Phrase	Description/Definition
Non-Hazardous Landfill:	A landfill which can accept non-inert (biodegradable) wastes e.g. municipal and commercial and Industrial waste and other non-hazardous wastes (including inert), that meet the relevant waste acceptance criteria.
Non-Inert Waste:	Waste that is potentially biodegradable or may undergo significant physical, chemical or biological change once landfilled.
Open Windrow Composting (OWC):	Open air composting whereby the organic waste is shredded into fine particles before being piled into open linear heaps known as 'windrows', which are approximately three metres high and four to six metres across.
Planning Condition:	Condition attached to a planning permission setting out requirements under which the development can take place. For example, the use of specific methods of construction, or hours of operation at a development.
Preferred Approach:	The second "pre-submission" consultation stage on Development Plan Documents with the objective of gaining public consensus over proposals prior to submission to government for independent examination.
Previously Developed Land:	Previously developed land is that which is or was occupied by a permanent structure (excluding agricultural or forestry buildings), and associated fixed-surface infrastructure.
Residual Waste:	'Residual Waste' is waste that has undergone treatment of some kind, with treatment being that as defined under the European Landfill Directive 1999/31/EC. The Directive defines "treatment" as "physical thermal, chemical or biological processes, including sorting, that change the characteristics of the waste in order to reduce its volume or hazardous nature, facilitate its handling or enhance recovery".
Strategic Environmental Assessment:	An environmental assessment of certain plans and programmes, including those in the field of planning and land use, which complies with the EU Directive 2001/42/EC.
Sustainable Community Strategy:	Community Strategies are 10-year vision statements for a given area, produced by the Local Strategy Partnership and required by national government. Local Area Agreement targets have to reflect the vision, priorities and challenges set out in Sustainable Community Strategies.
Sustainability Appraisal:	An appraisal of the economic, environmental and social effects of a plan from the outset of the preparation process to allow decisions to be made that accord with sustainable development.
Sustainable Transport:	Transport that has a reduced impact on the natural environment, as compared with road-based transport. In the context of waste transport, this includes rail and water-based transport. More generally, sustainable transport includes walking, cycling and vehicle sharing.
Tonnes Per Annum (tpa):	The number of tonnes accepted, processed, disposed of, or otherwise handled at waste management sites. Due to the volume of waste arising in the Plan area this may be referred to as 'Thousand tonnes per annum' (ktpa) or 'million tonnes per annum' (mtpa).

Word/Phrase	Description/Definition
Townscape:	The general appearance of a built-up area, for example a street, a town or city.
Transfer Station:	A transfer station is a facility where waste materials are transferred from small vehicles to large trucks to be bulked up for efficient transport to treatment or disposal sites over a large distance.
Waste Local Plan (WLP):	Waste Local Plans are produced by Waste Planning Authorities and detail a long-term plan for the management of the waste within that authority for a specified period.
Waste Hierarchy:	This concept suggests that the most effective environmental option is to reduce the amount of waste generated (reduction); where further reduction is not practicable, products and materials can sometimes be used again, either for the same or different purpose (reuse); failing that, value should be recovered from waste (through recycling, composting or energy recovery from waste); only if none of the above offer an appropriate solution should waste be disposed of (e.g. to landfill).
Waste Water:	Water that has been adversely affected in quality by human activities. Comprises liquid waste discharged by domestic residences, commercial properties, industry, and agricultural activities and can encompass a wide range of potential contaminants and concentrations.
Water Bodies:	Collective term for water within watercourses (rivers, ditches, drains), groundwater (held in geological strata such as chalk) and surface water (ponds, lakes, coastal waters).

## Appendix G - Roles and Responsibilities

## G Appendix G - Roles and Responsibilities

Within Essex and Southend-on-Sea there are a number of organisations that are involved in waste planning, management, and regulation. The different roles of the organisations and their responsibilities are briefly outlined below.

1. **Waste Planning:** Essex County Council and Southend-on-Sea Borough Council, as the waste planning authorities (WPA) for Essex, have specific responsibility for strategic and local waste land-use planning policy. This includes the preparation of local plans. They are also responsible for the determination of planning applications for the management of waste and for ensuring compliance with planning permissions.
2. **Waste Collection:** This is the responsibility of the Districts, Boroughs and Cities Councils, the waste collection authorities (WCA), who collect the municipal waste for their areas. Some Districts/Boroughs/Cities also collect some C&I waste.
3. **Waste Disposal:** Essex County Council and Southend-on-Sea Borough Council, as the waste disposal authority (WDA), is responsible for co-ordinating and managing the disposal of municipal waste, which includes household, some commercial or industrial waste, and waste deposited at Household Waste Recycling Sites. A Municipal Waste Management Strategy for Essex and Southend-on-Sea is prepared jointly with the WCA and the Environment Agency.
4. **Waste Recycling:** The WCA and WDA are responsible for the recycling of household waste. C&I waste recycling and CDEW recycling is mainly carried out by the private sector.
5. **Waste Management Facilities:** The private sector, the waste industry, provides facilities for waste transfer, recycling, treatment and disposal. Most landfill sites are privately owned. Contracts are entered into with the WDA for the treatment and disposal of municipal waste and with business for the collection and disposal of their wastes.
6. **Waste Regulation:** This is undertaken by the Environment Agency (EA) which aims to prevent or minimise the effects of pollution on the environment. It issues Environmental Permits (previously Waste Management Licences and Pollution Prevention and Control permits) and is responsible for the enforcement of any conditions it imposes.

## Appendix H - Policy Schedule

## H Appendix H - Policy Schedule

### Policy 1

#### Need for Waste Management Facilities

*In order to meet the future needs of the Plan area, waste development will be permitted to meet the shortfall in capacity of:*

- a. *Up to 218,000 tones per annum by 2031/32 of biological treatment for non-hazardous organic waste;*
- b. *Up to 1.95 million tonnes per annum by 2031/32 for the management of inert waste;*
- c. *Up to 200,000 tonnes per annum by 2031/32 for the further management of non-hazardous residual waste; and*
- d. *Up to 50,250 tonnes per annum by 2031/32 for the management of hazardous waste.*

### Policy 2

#### Safeguarding Waste Management Sites and Infrastructure

##### Waste Consultation Areas

*Where non-waste development is proposed within 250m of safeguarded sites, or within 400m of a Water Recycling Centre, the relevant Local Planning Authority is required to consult the Waste Planning Authority on the proposed non-waste development (except for those developments defined as 'Excluded' in 'Appendix C - Development Excluded from Safeguarding Provisions').*

*Proposals which are considered to have the potential to adversely impact on the operation of a safeguarded waste site or infrastructure, including the site allocations within this Plan, are unlikely to be opposed where:*

- a. *a temporary permission for a waste use has expired, or the waste management use has otherwise ceased and the site or infrastructure is considered unsuitable for a subsequent waste use; or*
- b. *redevelopment of the waste site or loss of the waste infrastructure would form part of a strategy or scheme that has wider environmental, social and/or economic benefits that outweigh the retention of the site or the infrastructure for the waste use, and alternative provision is made for the displaced waste use; or*
- c. *a suitable replacement site or infrastructure has otherwise been identified and permitted.*



## Policy 3

### Strategic Site Allocations

Waste management development at the following locations (see Strategic Site Allocations Map) will be permitted where proposals take into account the requirements identified in the relevant development principles:

1. For biological waste management at:
  - Basildon Water Recycling Centre, Basildon (W3);
  - Bellhouse Landfill Site, Colchester (W29);
  - Courtauld Road, Basildon (W20); and
  - Rivenhall, Braintree (IWMF2).
  
2. For inert waste recycling at:
  - Blackley Quarry, Gt Leighs, Chelmsford (L(i)10R);
  - Crumps Farm, Gt and Lt Canfield, Uttlesford (W32);
  - Elsenham, Uttlesford (W8);
  - Morses Lane, Brightlingsea, Tendring (W31);
  - Newport Quarry, Uttlesford (L(i)17R).
  - Sandon East, Chelmsford (W7);
  - Slough Farm, Ardleigh, Tendring (L(n)1R); and
  - Sunnymead, Elmstead & Heath Farms, Tendring (W36).
  
3. For residual non hazardous waste management at:
  - Rivenhall, Braintree (IWMF2).
  
4. For inert landfill at:
  - Blackley Quarry, Gt Leighs, Chelmsford (L(i)10R);
  - Bellhouse Landfill Site, Colchester (L(n)5);
  - Little Bullocks Farm, Gt and Lt Canfield, Uttlesford (L(n)7R);
  - Dollymans Farm, Basildon/Rochford (L(i)16)
  - Fingringhoe Quarry, Colchester (L(i)15);
  - Newport Quarry, Uttlesford (L(i)17R);
  - Sandon, Chelmsford (L(i)6);
  - Slough Farm, Ardleigh, Tendring (L(n)1R); and
  - Sunnymead, Elmstead & Heath Farms, Tendring (L(i)5).
  
5. For hazardous landfill at:
  - Little Bullocks Farm, Gt and Lt Canfield, Uttlesford (L(n)8R).

## Policy 4

### Areas of Search

*Proposals for waste management development in the following Areas of Search, as defined on the Policies Map, will be supported in principle provided that the design and use of the facility is compatible with existing uses in the employment area.*

*Proposals will be considered against other relevant policies of this Plan and the wider Development Plan.*

**Table 22**

<b>Area of Search</b>	<b>District</b>	<b>Area of Search</b>	<b>District</b>
<i>Burnt Mills Central</i>	<i>Basildon</i>	<i>Westways</i>	<i>Chelmsford</i>
<i>Festival Business Park</i>	<i>Basildon</i>	<i>Widford Industrial Estate</i>	<i>Chelmsford</i>
<i>Pipps Hill</i>	<i>Basildon</i>	<i>Land off Axial Way, Myland</i>	<i>Colchester</i>
<i>Southfield Business Park</i>	<i>Basildon</i>	<i>Severalls Industry Park</i>	<i>Colchester</i>
<i>Bluebridge Industrial Estate</i>	<i>Braintree</i>	<i>Tollgate, Stanway</i>	<i>Colchester</i>
<i>Earls Colne Airfield</i>	<i>Braintree</i>	<i>Whitehall Road Industrial Estate</i>	<i>Colchester</i>
<i>Eastways-Crittall Road, Waterside Park</i>	<i>Braintree</i>	<i>Langston Road/Oakwood Hill, Loughton</i>	<i>Epping Forest</i>
<i>Freebournes Industrial Estate</i>	<i>Braintree</i>	<i>Pinnacles and Roydenbury Industrial Estate</i>	<i>Harlow</i>
<i>Skyline 120</i>	<i>Braintree</i>	<i>Temple Fields</i>	<i>Harlow</i>
<i>Springwood Industrial Estate</i>	<i>Braintree</i>	<i>Rochford Business Park</i>	<i>Rochford</i>
<i>Sturmer Industrial Estate Area 1</i>	<i>Braintree</i>	<i>Michelins Farm</i>	<i>Rochford</i>
<i>Childerditch Industrial Estate</i>	<i>Brentwood</i>	<i>Stock Road</i>	<i>Southend-on-Sea</i>
<i>West Horndon</i>	<i>Brentwood</i>	<i>Temple Farm</i>	<i>Southend-on-Sea</i>
<i>Drovers Way</i>	<i>Chelmsford</i>	<i>Martell's Farm Industrial Area</i>	<i>Tendring</i>

Area of Search	District	Area of Search	District
<i>Dukes Park Industrial Estate</i>	<i>Chelmsford</i>	<i>Springfield Business Park</i>	<i>Chelmsford</i>
<i>Start Hill, Great Hallingbury</i>	<i>Uttlesford</i>		

## Policy 5

### Enclosed Waste Facilities on unallocated sites or outside Areas of Search

*Proposals for new enclosed waste management facilities will be permitted where:*

- 1. the waste site allocations and the Areas of Search in this Plan are shown to be unsuitable or unavailable for the proposed development;*
- 2. although not exclusively, a need for the capacity of the proposed development has been demonstrated to manage waste arising from within the administrative areas of Essex and Southend-on-Sea; and*
- 3. it is demonstrated that the site is at least as suitable for such development as Site Allocations or Areas of Search, with reference to the overall spatial strategy and site assessment methodology associated with this Plan.*

*In addition, proposals should be located at or in:*

- a. employment areas that are existing or allocated in a Local Plan for general industry (B2) and storage and distribution (B8); or*
- b. existing permitted waste management sites or co-located with other waste management development; or*
- c. the same site or co-located in close proximity to where the waste arises; or*
- d. the curtilages of Waste Water Treatment Works (in the case of biological waste); or,*
- e. areas of Previously Developed Land; or*
- f. redundant agricultural or forestry buildings and their curtilages (in the case of green waste and/or biological waste).*

*Proposals for energy recovery facilities with combined heat and power are expected to demonstrate that the heat produced will be supplied to a district heat network or direct to commercial or industrial users.*

*Any proposals that come forward on land use types not identified above will be assessed on their merits, based on the policies in this Plan.*

## Policy 6

### Open Waste Facilities on unallocated sites or outside Areas of Search

*Proposals for new open waste management facilities will be permitted where:*

- 1. the waste site allocations and the Areas of Search in this Plan are shown to be unsuitable or unavailable for the proposed development;*
- 2. although not exclusively, a need for the capacity of the proposed development has been demonstrated to manage waste arising from within the administrative areas of Essex and Southend-on-Sea; and*
- 3. it is demonstrated that the site is at least as suitable for such development as Site Allocations or Areas of Search, with reference to the overall spatial strategy and site assessment methodology associated with this Plan.*

*In addition, proposals should be located at or in:*

- a. redundant farm land (in the case of green waste and/or biological waste); or*
- b. demolition and construction sites, where the inert waste materials are to be used on the construction project on that site; or*
- c. existing permitted waste management sites or co-located with other waste management development; or*
- d. the curtilages of Waste Water Treatment Works (in the case of biological waste); or*
- e. mineral and landfill sites where waste material is used in conjunction with restoration, or proposed waste operations are temporary and linked to the completion of the mineral/landfill operation; or*
- f. areas of Previously Developed Land; or*
- g. employment areas that are existing or allocated in a Local Plan for general industry (B2) and storage and distribution (B8).*

*Any proposals that come forward on land use types not identified above will be assessed on their merits, based on the policies in this Plan.*

## Policy 7

### Radioactive Waste Management at Bradwell-on-Sea

*Proposals for facilities for the management of nuclear radioactive Intermediate Level Waste (ILW), Low Level Waste (LLW) or Very Low Level Waste (VLLW) will be supported within the Nuclear Licensed Areas at Bradwell-on-Sea, where:*

- a. the proposals are consistent with the national strategy for managing ILW, LLW and VLLW as well as the decommissioning plans for the Bradwell-on-Sea power station;*
- b. the proposals are informed by the outcome of economic and environmental assessments that support and justify the management of radioactive waste at this location, and;*
- c. the proposals would not cause any unacceptable adverse impacts to the environment, human health or local amenity.*

## Policy 8

### Non-Nuclear Very Low-Level and Low-Level Radioactive Waste

*Proposals for the management of non-nuclear low-level and very low-level radioactive waste will be permitted where:*

- a. a requirement to manage waste arising from within Essex and Southend-on-Sea has been identified; and*
- b. the proposed development (including landfill) has been demonstrated to be the most appropriate and acceptable development in relation to the Waste Hierarchy, and;*
- c. the proposal would not cause any unacceptable adverse impacts to the environment, human health or local amenity.*

## Policy 9

### Waste Disposal Facilities

*Proposals for landfill facilities will be permitted where:*

- 1. the landfill site allocations in this Plan are shown to be unsuitable or unavailable for the proposed development;*
- 2. Although not exclusively, a need for the capacity of the proposed development has been demonstrated to manage waste arising from within the administrative areas of Essex and Southend-on-Sea;*

3. *it is demonstrated that the site is at least as suitable for such development as the landfill site allocations, with reference to the site assessment methodology associated with this Plan; and*
4. *that the proposed landfill has been demonstrated to be the most appropriate and acceptable development in relation to the Waste Hierarchy.*

*In addition, preference will be given to proposals:*

- a. *for the restoration of a preferred or reserve site in the Minerals Local Plan; or*
- b. *for an extension of time to complete the permitted restoration within the boundary of an existing landfill site.*

*Proposals for non-inert landfill are required to demonstrate the capture of landfill gas for energy generation by the most efficient means.*

*Any proposals that come forward on land use types not identified above will be assessed on their merits, based on the policies in this Plan.*

## **Policy 10**

### **Development Management Criteria**

*Proposals for waste management development will be permitted where it can be demonstrated that the development would not have an unacceptable impact (including cumulative impact in combination with other existing or permitted development) on:*

- a. *local amenity (including noise levels, odour, air quality, dust, litter, light pollution and vibration);*
- b. *water resources with particular regard to:*
  - *the quality of water within water bodies:*
    - *Preventing the deterioration of their existing status; or*
    - *Failure to achieve the objective of 'good status' and*
  - *the quantity of water for resource purposes within water bodies.*
- c. *the capacity of existing drainage systems;*
- d. *the best and most versatile agricultural land;*
- e. *farming, horticulture and forestry;*

- f. aircraft safety due to the risk of bird strike and/or building height and position;*
- g. the safety and capacity of the road and other transport networks;*
- h. the appearance, quality and character of the landscape, countryside and visual environment and any local features that contribute to its local distinctiveness;*
- i. the openness and purpose of the Metropolitan Green Belt;*
- j. Public Open Space, the definitive Public Rights of Way network and outdoor recreation facilities;*
- k. land stability;*
- l. the natural and geological environment (including internationally, nationally or locally designated sites and irreplaceable habitats);*
- m. the historic environment including heritage and archaeological assets and their settings; and*
- n. the character and quality of the area, in which the development is situated, through poor design.*

*Where appropriate, enhancement of the environment would be sought, including, but not exclusively, the enhancement of the Public Rights of Way network, creation of recreation opportunities and enhancement of the natural, historic and built environment and surrounding landscape.*

## Policy 11

### Mitigating and Adapting to Climate Change

*Proposals for waste management development, through their construction and operation, are required to minimise their potential contribution to climate change by reducing greenhouse gas emissions, incorporating energy and water efficient design measures and being adaptable to future climatic conditions.*

1. *Proposals for waste management development will:*
  - a. *demonstrate how the location, design (including associated buildings) and transportation related to the development will limit greenhouse gas emissions;*
  - b. *support opportunities for decentralised and renewable or low-carbon energy supply, subject to compliance with other policies in the Development Framework;*
  - c. *demonstrate the use of sustainable drainage systems, water harvesting from impermeable surfaces and layouts that accommodate waste water recycling; and*
  - d. *incorporate proposals for sustainable travel including travel plans where appropriate.*
2. *Proposals for waste management development will only be permitted where:*
  - a. *there would not be an unacceptable risk of flooding on site or elsewhere as a result of impediment to the flow of storage or surface water, as demonstrated by a Flood Risk Assessment, where required by the National Planning Policy Framework.*
  - b. *existing and proposed flood defences are protected and there is no interference with the ability of responsible bodies to carry out flood defence works and maintenance where applicable*
  - c. *there would not be an unacceptable risk to the quantity and quality of surface and ground waters, or impediment to groundwater flow.*
3. *Proposals which are capable of directly producing energy or a fuel from waste should, where reasonably practicable, demonstrate that:*
  - a. *excess heat can be supplied locally to a district heat network or directed to commercial or industrial users of heat;*
  - b. *for anaerobic digestion proposals there is an ability to inject refined gas produced as part of the process into the gas pipeline network or to be stored for use as a fuel;*
  - c. *for advanced thermal treatment there is an ability to convert syngas for use as a fuel;*
  - d. *for Mechanical Heat Treatment or Mechanical Biological Treatment, development can supply the heat produced as part of the process to a district heating scheme;*



- e. *for non-hazardous landfill, the landfill gas is captured for the recovery of energy by the most efficient methods and consideration has been given to the ability to connect to a district heat network or for converting recovered gas for injection to the gas pipeline network;*
- f. *where the provision of e. (above) is not feasible or technically practicable, the development shall not preclude the future implementation of such systems.*

## Policy 12

### Transport and Access

*Proposals for waste management development will be permitted where it is demonstrated that the development would not have an unacceptable impact on the efficiency and effective operation of the road network, including safety and capacity, local amenity and the environment.*

*Proposals for the transportation of waste by rail and/or water will be encouraged subject to other policies in this Plan. Where transportation by road is proposed, this will be permitted where the road network is suitable for use by Heavy Goods Vehicles or can be improved to accommodate such vehicles.*

*The following hierarchy of preference for transportation will be applied:*

- a. *the transport of waste by rail or water;*
- b. *where it is demonstrated that (a) above is not feasible or practicable, access will be required to a suitable existing junction with the main road network (not including secondary distributor roads, estate roads and other routes that provide local access), via a suitable section of existing road, as short as possible, without causing a detrimental impact upon the safety and efficiency of the network; or*
- c. *where it is demonstrated (b) above is not feasible, direct access to the main road network involving the construction of a new access and/or junction where there is no suitable existing access point and/or junction.*
- d. *Where access to the main road network in accordance with (b) and (c) above is not feasible, road access via a suitable existing road prior to gaining access onto the main road network will exceptionally be permitted, having regard to the scale of the development, the proximity of sensitive receptors, the capacity of the road and an assessment of the impact on road safety*

## Policy 13

### Landraising

*Proposals for landraising with waste will only be permitted where it is demonstrated that there are no feasible or practicable alternative means to achieve the proposed development.*

*Proposals will also demonstrate that:*

- a. there is a proven significant benefit that outweighs any harm caused by the proposal;*
- b. the amount of waste materials used to raise the level of the land is the minimum amount of material necessary and is essential for the restoration of the site; and*
- c. in the case of land remediation and other projects, will provide a significant improvement to damaged or degraded land and/or provide a greater environmental or agricultural value than the previous land use.*

*Proposals for landraising that are considered to constitute a waste disposal activity, for its own sake, will not be permitted.*

## Policy 14

### Landfill Mining and Reclamation

*Proposals for the mining of landfill sites will be permitted where:*

- a. the site (without intervention) is demonstrated to be endangering or has the potential to endanger human health or harm the environment;*
- b. removal is required to facilitate major infrastructure projects and it is demonstrated that there are no other locations which are suitable for the infrastructure; and/or*
- c. the waste is demonstrated as suitable for recovery and/or the waste will be captured for fuel/energy as part of the mining operation.*

*Proposals will be considered in terms of their impact on the restored use, and whether there would be an unacceptable impact on any development which has taken place since the closure of the old landfill. Proposals should not cause unacceptable adverse impact on the local environment and amenity.*

# Replacement Waste Local Plan

## Schedule of Modifications

January 2017





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## 1 Introduction

**1.1** In June 2016, the Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan was submitted to the Secretary of State who appointed a Planning Inspector to undertake the formal examination process. The Inspector conducted hearing sessions over a two week period in September and October 2016.

**1.2** Following the public hearing sessions the Authorities made a request to the Inspector to make several modifications (changes), which were deemed necessary to make the plan sound/legally compliant and appropriate for adoption. The modifications are those which were discussed in detail during the hearing sessions and the Inspector has advised that they must be subject to public consultation.

**1.3** The modifications are separated into two categories:

- **Main modifications:** those changes required by the Inspector to ensure the Plan is sound and legally compliant. Any change to a policy or to the interpretation of a policy, no matter how minor, is considered to be a main modification.
- **Minor modifications:** those changes identified by the Planning Authority which improve the readability and consistency of the Plan as a whole.

**1.4** Modifications are shown by a **bold strikethrough** for deletions and additions are shown in **red, underlined bold**.

### Public consultation

**1.5** This document sets out the modifications for public consultation, with comments invited during a six-week period from **5 January to 16 February 2017**. All comments must be received by **17:00 on 16 February**.

**1.6** This is a focused consultation, with representations encouraged on the potential modifications and the supporting addendum reports to the Site Assessment and Methodology Report and the Sustainability Appraisal. Any response which refers to other aspects of the Replacement Waste Local Plan or the evidence base will not be considered.

### How to respond

**1.7** In line with e-government policy we encourage you to respond to the consultation online via <http://consult.essexcc.gov.uk>. Responding online is the fastest and most cost effective method of response; it also allows responses to be processed quickly so to be ready for viewing on the consultation homepage. Other ways to submit your representation are listed on the back cover of this document.

**1.8** If you are not able to use the online response system, a form is provided which respondents are encouraged to use in order that all necessary information is provided. This asks for details of the section of the document to which the representation relates. The form is available to download from: <http://www.essex.gov.uk/wlp>.

**1.9** Please be aware that for your representation to be accepted for further consideration, it must include your name and full postal address. All representations will be made publicly available in accordance with the Freedom of Information Act 2000 and the Data Protection Act 1998 and will be made available to view online. Personal information such as the respondent's email, phone number and address will not be published.

### Next steps

**1.10** The outcome of the public consultation process must be reported back to the Inspector. The Inspector will then review the issues raised and prepare a final report. The Inspector could, for example, recommend that the Plan is sound/legally compliant if adopted with the main modifications or she could still find the Plan unsound/not legally compliant. The latter outcome is considered unlikely given current indications, but either way a report will be presented to Full Council of both Authorities in due course recommending that the Plan is either adopted or withdrawn taking into account the Inspector's recommendations.

**1.11** The Inspector has indicated that, given commitments at the Planning Inspectorate, it would be prudent to allow for a period of 6 weeks following the submission of the consultation responses to receive her final report. A proposed timetable for adoption of the Plan is outlined in the table below:

**Table 1 Timetable to adoption**

Stage	Date(s)
Public Consultation on modifications	Thursday 5 January - Thursday 16 February 2017
Submission of responses to Inspector	March 2017
Inspector Report	April 2017
Preparation of final Plan and recommendations for adoption via cabinet and Full Council	May 2017
Full Council adoption of Plan	July 2017

**1.12** The Replacement Waste Local Plan, once adopted, will form part of the Development Plan for Essex and will replace the Essex Waste Local Plan, which was adopted in 2001. The Replacement Plan will outline the vision, objectives and spatial strategy to enable the delivery of sustainable waste development and set out policies to manage waste to 2032.



## 2 Main Modifications

**2.1** These modifications have been proposed by the Inspector during the hearing sessions of the Examination in Public in order to ensure that the Replacement Waste Local Plan is sound and legally compliant. The National Planning Policy Framework 2012 sets out the four Tests of Soundness against which the Plan is being assessed by the Planning Inspectorate. A sound document will be:

1. Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities, where it is reasonable to do so and consistent with achieving sustainable development;
2. Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
3. Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
4. Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the (Minerals and Waste Development) Framework.

**Table 2 Main Modifications**

Modification	Modification Number	Paragraph/Policy Reference	Original Text	Amendment	Justification
MAIN	1	Paragraph 4.21 to 4.23	See 'Appendix 1 - The Waste Challenge at a Glance'	See 'Appendix 1 - The Waste Challenge at a Glance' <ul style="list-style-type: none"> <li>• Update of figures used in 'The Waste Challenge – At a Glance' section to take into account further information arising from the consultation, the Hearings and the addition of L(i)16 – Dollymans Farm.</li> </ul>	To be “effective” and “positively prepared” the Plan must reflect the best available data, including that relating to cross boundary movements from London.

Modification	Modification Number	Paragraph/Policy Reference	Original Text	Amendment	Justification
MAIN	2	Paragraph 5.3	The principle of net self-sufficiency does not apply to reactive hazardous waste or radioactive waste as it is not considered practical to provide for such specialist facilities within the Plan area.	The principle of net self-sufficiency does not apply to <b>hazardous waste or</b> radioactive waste as it is not considered practical to provide for such specialist facilities <b>on the basis of net self-sufficiency</b> within the Plan area.	To clarify the approach of the RWLP in respect of net self-sufficiency.
MAIN	3	Policy 1	See 'Appendix 2 - Policy 1'	See 'Appendix 2 - Policy 1' <ul style="list-style-type: none"> <li>• Clause a - update of shortfall capacity figure for biological treatment for non-hazardous organic waste</li> <li>• Clause b – update of shortfall capacity figure for inert waste</li> <li>• Clause c – update of term “other waste” to be clearer</li> </ul>	To be “effective” and “positively prepared” the Plan must reflect the best available data, including that relating to cross boundary movements from London.  Update also provides clarity around what is meant by ‘other waste’.
MAIN	4	Policy 2	See 'Appendix 3 - Supporting Text and Policy 2'	See 'Appendix 3 - Supporting Text and Policy 2' <ul style="list-style-type: none"> <li>• Update to reflect consultation distance in</li> </ul>	The increase in the WTC safeguarding distance was made at the request of Anglia

Modification	Modification Number	Paragraph/Policy Reference	Original Text	Amendment	Justification
				<p>respect of WTC, from 200m to 400m.</p> <ul style="list-style-type: none"> <li>Updates to paragraph 6.10 and a new paragraph 6.11 to clarify operation of safeguarding policy.</li> <li>Updates to the policy which act to set out the stance the WPA is likely to take to applications within safeguarding areas.</li> </ul>	<p>Water, who provided evidence to support the request.</p> <p>Updates to paragraph 6.10, the new paragraph 6.11 and Policy 2 are included for reasons of clarity.</p>
MAIN	5	Policy 3	See 'Appendix 4 - Policy 3'	<p>See 'Appendix 4 - Policy 3'</p> <ul style="list-style-type: none"> <li>Clause 1 – name change of Basildon Waste Water Treatment Works.</li> <li>Clause 2 – removal of Wivenhoe Quarry allocation, with the facility proposed in the Wivenhoe locality moved to the Sunnymead, Elmstead and Heath Farms allocation.</li> <li>Clause 3 update to clarify what is meant by 'other waste' management.</li> </ul>	<p>The change of name to the Basildon site is a factual update.</p> <p>The changes to Clause 2 reflect a new preference on behalf of the site promoter for inert recycling capacity delivery, and at this initial stage, the revisions would be supported by the Waste Planning Authority.</p>

Modification	Modification Number	Paragraph/Policy Reference	Original Text	Amendment	Justification
				<ul style="list-style-type: none"> <li>Clause 4 – inclusion of a new inert recycling allocation at Dollymans Farm, Basildon.</li> <li>Removal of the words “as follows and”.</li> </ul>	<p>The change from the term “other waste” in Clause 3, to “residual non-hazardous waste” provides clarity regarding the type of waste managed at this site.</p> <p>The introduction of a new site at Clause 4 is considered necessary for the Plan to be judged as being “positively prepared” as the Plan now better seeks to meet the needs of the Plan area.</p> <p>The removal of the words “as follows and” is for reasons of clarity.</p>
MAIN	6	Paragraph 8.10	Proposals within the Areas of Search will normally require express planning permission and will be considered against policies in the RWLP, and the wider Development	Proposals within the Areas of Search will normally require express planning permission and will be considered against <b>other relevant</b> policies in the RWLP,	To provide additional clarity with regard to the intended operation of Areas of Search.

Modification	Modification Number	Paragraph/Policy Reference	Original Text	Amendment	Justification
			<p>Plan as a whole. The design and operation of waste management facilities proposed within Areas of Search should be consistent with existing uses in the employment area.</p>	<p><u>including Policy 10 – Development Management</u>, and the wider Development Plan as a whole. <u>The need to consider the wider Development Plan is important as it is the relevant Local Plan which determines whether an Area of Search designation remains relevant. Should a Local Plan seek to re-allocate land pertaining to an Area of Search away from B2/B8 uses, the criteria upon which Areas of Search are based would no longer be fulfilled. In such instances, the location would cease to be an Area of Search and Policy 4 would no longer apply.</u> The design and operation of waste management facilities proposed within Areas of Search should be <b>consistent</b> <u>compatible</u> with existing uses in the employment area.</p>	

Modification	Modification Number	Paragraph/Policy Reference	Original Text	Amendment	Justification
MAIN	7	Policy 4	See 'Appendix 5 - Policy 4'	<p>See 'Appendix 5 - Policy 4'</p> <ul style="list-style-type: none"> <li>Revised policy to include supporting text in order to aid clarity around the purpose of Areas of Search.</li> <li>Removal of Oakwood and Crusader Business Park, Tendring.</li> </ul>	<p>To provide additional clarity with regard to the intended operation of Areas of Search.</p> <p>The removal of Oakwood and Crusader Business Park as an Area of Search reflects the recent granting of a housing permission.</p>
MAIN	8	Policy 5	See 'Appendix 7 - Policy 5'	<p>See 'Appendix 7 - Policy 5'</p> <ul style="list-style-type: none"> <li>Title change to better reflect that the policy applies to enclosed facility proposals on unallocated sites.</li> <li>Clause 1 – replacement of “or” with “and”, and deletion of “and” from “and/or”.</li> <li>Clause 2- the addition of “although not exclusively” in relation to</li> </ul>	<p>The Plan requires further clarity in order to be considered “effective” .</p> <p>The changes to Clause 1 ensure the correct operation of the Policy.</p> <p>The addition of the words “although not exclusively” more directly aligns the plan with the notion of net self-sufficiency.</p>

Modification	Modification Number	Paragraph/Policy Reference	Original Text	Amendment	Justification
MAIN	9	Policy 6	See 'Appendix 8 - Policy 6'	<p>waste arising in the Plan Area.</p> <ul style="list-style-type: none"> <li>• Addition of a final sentence to state that proposals not according with the Policy will be assessed on their merits.</li> </ul>	<p>The Plan requires further clarity in order to be considered "effective".</p> <p>The changes to Clause 1 ensure the correct operation of the Policy.</p> <p>The addition of the words "although not exclusively" more directly aligns the plan with the notion of net self-sufficiency.</p>
			See 'Appendix 8 - Policy 6'	<ul style="list-style-type: none"> <li>• Title change to better reflect that the policy applies to open facility proposals on unallocated sites.</li> <li>• Clause 1 – replacement of "or" with "and", and deletion of "and" from "and/or".</li> <li>• Clause 2- the addition of "although not exclusively" in relation to waste arising in the Plan Area.</li> <li>• Addition of a final sentence to state that proposals not according with the Policy will be assessed on their merits.</li> </ul>	

Modification	Modification Number	Paragraph/Policy Reference	Original Text	Amendment	Justification
MAIN	10	Policy 7	See 'Appendix 9 - Supporting Text and Policy 7'	<p>See 'Appendix 9 - Supporting Text and Policy 7'</p> <ul style="list-style-type: none"> <li>Title change to clarify that the policy deals with all radioactive waste and not just nuclear waste.</li> <li>First paragraph – addition of the word “management” in place of “treatment and/or storage” and addition of “supported” in place of “only be acceptable”.</li> <li>Clause b – addition of “radioactive” and “at this location” in place of “decommissioned nuclear” and “site” respectively.</li> </ul>	<p>The Plan requires further clarity to be considered “effective”.</p> <p>More positive language was required to ensure that the Plan was “positively prepared”.</p> <p>Further modifications reflect extant national guidance terminology.</p>
MAIN	11	Policy 9	See 'Appendix 10 - Policy 9'	<p>See 'Appendix 10 - Policy 9'</p> <ul style="list-style-type: none"> <li>Title change to better reflect that the policy applies to new disposal facilities on unallocated sites.</li> <li>Clause 1 – replacement of “or” with “and”, and</li> </ul>	<p>The Plan requires further clarity in order to be considered “effective”.</p> <p>The changes to Clause 1 ensure the correct operation of the Policy.</p>



Modification	Modification Number	Paragraph/Policy Reference	Original Text	Amendment	Justification
				<p>deletion of “and” from “and/or”.</p> <ul style="list-style-type: none"> <li>Clause 2- the addition of “although not exclusively” in relation to waste arising in the Plan Area.</li> <li>Addition of a final sentence to state that proposals not according with the Policy will be assessed on their merits.</li> </ul>	<p>The addition of the words “although not exclusively” more directly aligns the plan with the notion of net self-sufficiency.</p>
MAIN	12	Paragraph 9.33	<p>The Public Rights of Way (PROW) network provides an important means of accessing the countryside. Where necessary, applicants will be required to ensure that PROW remain usable at all times or provide satisfactory alternative routes. Alternative paths and any necessary diversions of existing paths will be required to be in place prior to the closure of the existing PROW. Restoration schemes should provide for access which is at least as</p>	<p>The Public Rights of Way (PROW) network provides an important means of accessing the countryside. Where <b>relevant, applications for waste management</b> will be required to ensure that PROW remain usable at all times or provide satisfactory alternative routes. Alternative paths and any necessary diversions of existing paths will be required to be in place prior to the closure of the existing PROW. <b>Restoration schemes should, in the first</b></p>	<p>The modification demonstrates a stronger accordance with the Essex and Southend-on-Sea Public Rights of Way Improvement Plans.</p>

Modification	Modification Number	Paragraph/Policy Reference	Original Text	Amendment	Justification
			<p>good as that existing before workings began and should be seen as an opportunity to create new PROW where this is possible and desirable. The closure of a PROW, where no alternative route is provided, will normally not be acceptable.</p>	<p><u>instance, be seen as an opportunity to enhance and upgrade PROW where possible, especially with regard to the provision of Bridleways as multi-user paths as part of any permission granted. In all cases, restoration schemes should provide for access which is at least as good as that existing before workings began, and the</u>  <u>The</u> closure of a PROW, where no alternative route is provided, will not normally be acceptable.”</p>	
MAIN	13	Policy 10	See 'Appendix 11 - Policy 10'	<p>See 'Appendix 11 - Policy 10'</p> <ul style="list-style-type: none"> <li>• More detail provided around Clause b (protection of water resources).</li> <li>• Addition of final sentence setting out that enhancement opportunities should be sought.</li> </ul>	Further clarification and the addition of the explicit need to seek enhancements is required to enable the Plan to be “Positively Prepared”.

Modification	Modification Number	Paragraph/Policy Reference	Original Text	Amendment	Justification
MAIN	14	Policy 12	See 'Appendix 12 - Policy 12'	See 'Appendix 12 - Policy 12' <ul style="list-style-type: none"> <li>Inclusion of Clause d to set out a further tier in the hierarchy of preference for transportation.</li> </ul>	A formatting error resulted in the exclusion of Clause d during the drafting of Policy 12 at the Pre-Submission Stage.
<b>Appendix B - Development Principles</b>					
MAIN	15	Table 8 - Bellhouse Landfill Site	Indicative Facility Scale: 75,000tpa - Biological Treatment Facility  3,000,000m3 – Inert Landfill  Estimated Availability: Between: up to 5-10 years from adoption	Indicative Facility Scale: 75,000tpa - Biological Treatment Facility  <del>3,000,000m3</del> <b>250,000tpa</b> – Inert Landfill  Estimated Availability: <b>Upon adoption (2017). Between: up to 5-10 years from adoption</b>	For the Plan to be deliverable (and “effective”) it is necessary to update operational details relating to site allocations as they became known during the Examination process.
MAIN	16	Table 11 – Little Bullocks and Crumps Farm, Great and Little Canfield	See 'Appendix 14 - Table 11 Little Bullocks and Crumps Farm, Great and Little Canfield'	See 'Appendix 14 - Table 11 Little Bullocks and Crumps Farm, Great and Little Canfield' <ul style="list-style-type: none"> <li>Site 1 Area and Boundary amended to be consistent with MLP.</li> </ul>	or the Plan to be deliverable (and “effective”) it is necessary to update operational details relating to site allocations as they

Modification	Modification Number	Paragraph/Policy Reference	Original Text	Amendment	Justification
				<ul style="list-style-type: none"> <li>Estimated Availability for Site 3 updated.</li> <li>Life of Site 2 updated.</li> <li>Life of Site 3 updated.</li> <li>Site 2 - Removal of bullet point 1.</li> </ul>	<p>became known during the Examination process.</p>
MAIN	17	Table 14 – Morses Lane, Brightlingsea	<p>See 'Appendix 15 - Table 14 Morses Lane, Brightlingsea'</p> <p>Morses Lane Site Assessment Scores:</p> <ul style="list-style-type: none"> <li>"3D – Proximity to Sensitive Receptors" – Amber 3.</li> <li>"3K – Recreation Facilities" – Green.</li> </ul>	<p>See 'Appendix 15 - Table 14 Morses Lane, Brightlingsea'</p> <ul style="list-style-type: none"> <li>The inclusion of a statement that the facility would be enclosed (bullet point 5).</li> <li>Additional bullet point regarding the need for new development to not impact on the nearby retail use (bullet point 6).</li> </ul> <p>Morses Lane Site Assessment Scores:</p> <ul style="list-style-type: none"> <li>"3D – Proximity to Sensitive Receptors" – Red.</li> <li>"3K – Recreation Facilities" – Amber 2.</li> </ul>	<p>To strengthen the intended protection of amenity, particularly for proximal land uses.</p> <p>Changes to the assessment scores are required to accommodate information raised at the Hearings.</p>

Modification	Modification Number	Paragraph/Policy Reference	Original Text	Amendment	Justification
				See MC2 Site Assessment Methodology Report for the site assessment proforma and rationale for allocation.	
MAIN	18	Table 15 – Newport Quarry	See 'Appendix 16 - Table 15 Newport Quarry'	See 'Appendix 16 - Table 15 Newport Quarry' <ul style="list-style-type: none"> <li>Update to the expected form of restoration (bullet point 1).</li> <li>Update to environmental and landscape considerations (bullet point 2).</li> <li>Update to routeing agreement (bullet point 6).</li> </ul>	To strengthen the intended protection of local amenity to address the concerns of local residents.
MAIN	19	Table 16 – Rivenhall	Indicative Facility Scale: AD 85,000tpa CHP 360,000tpa	Indicative Facility Scale: AD <del>85,000tpa</del> <b>30,000tpa</b> CHP <del>360,000tpa</del> <b>595,000tpa</b>	For the Plan to be deliverable (and “effective”) it is necessary to update operational details relating to site allocations as they became known during the Examination process.

Modification	Modification Number	Paragraph/Policy Reference	Original Text	Amendment	Justification
MAIN	20	Table 17 – Sandon	Indicative Facility Scale: 40,000 tpa – Inert Waste Recycling Capacity	Indicative Facility Scale: <del>40,000 tpa</del> <b>300,000 tpa</b> – Inert Waste Recycling Capacity	For the Plan to be deliverable (and “effective”) it is necessary to update operational details relating to site allocations as they became known during the Examination process.
MAIN	21	Table 19 – Sunnymead, Elmstead and Heath Farms	See 'Appendix 17 - Table 19 Sunnymead, Elmstead and Heath Farms'	Inclusion of recycling operations (new allocated at W36) originally allocated at Wivenhoe Quarry (W13). The two operations (L(i)5 and W36) proposed at Sunnymead, Elmstead and Heath Farms are now included within a single table.  See 'Appendix 17 - Table 19 Sunnymead, Elmstead and Heath Farms'  <ul style="list-style-type: none"> <li>Update “Site Allocation For”.</li> </ul>	For the Plan to be deliverable (and “effective”) it is necessary to update operational details relating to site allocations as they became known during the Examination process.

Modification	Modification Number	Paragraph/Policy Reference	Original Text	Amendment	Justification
				<ul style="list-style-type: none"> <li>Update "Estimated Availability."</li> <li>Update "Life".</li> </ul> <p>New development principles included to reflect the outcome of the assessment process.</p> <p>See MC2 Site Assessment Methodology And Report Addendum for the site assessment proforma and rationale for allocation.</p>	
MAIN	22	Table 20 – Wivenhoe Quarry Plant Area		<p>Removal of the site allocation to reflect that the facility is now included as part of Sunnymead, Elmstead and Heath Farms.</p>	<p>Development at this site is no longer supported by the site operator for operational reasons. Mineral development will cease at this location shortly, and is anticipated to commence at the adjacent Sunnymead location, subject to planning permission. As such, it is intended that the aggregate recycler</p>

Modification	Modification Number	Paragraph/Policy Reference	Original Text	Amendment	Justification
					be re-located to Sunnymead.
MAIN	23	Table xx <sup>(1)</sup> – Dollymans Farm	Site not allocated at Pre-Submission stage.	Allocation of site See 'Appendix 18 - Table xx Dollymans Farm' for Development Principles and the MC2 Site Assessment Methodology and Report Addendum for the site assessment proforma and rationale for allocation.	To be "positively prepared" it was determined that this site should be added to the Preferred Sites list so that the Plan better seeks to meet the inert disposal needs of the Plan area.
<b>Appendix C - Development Excluded from Safeguarding Provisions</b>					
MAIN	24	Table 21 – Development in Waste Consultation Areas	See 'Appendix 19 - Table 21 Development in Waste Consultation Area'  The original safeguarding table (Table 21) highlighted that all 'change of use' applications were to be included within the scope of	See 'Appendix 19 - Table 21 Development in Waste Consultation Area'  It is proposed to amend the safeguarding table to reduce the range of change of use applications to be included within the scope of Policy 2 to changes of use away from	To remove the need for the Waste Planning Authority to be consulted on applications which are not likely to impact on the operation of waste management facilities.

1 Table numbering to be confirmed prior to Adoption.



Modification	Modification Number	Paragraph/Policy Reference	Original Text	Amendment	Justification
			<p>Policy 2 – Safeguarding Waste Management Sites and Infrastructure</p> <p>Removal from Table 21 of the row stating that ‘Applications for temporary buildings, structures or uses (for up to five years)’ were to be ‘Included’ within the scope of Policy 2.</p>	<p>B2/B8 uses and changes away from any use class to Category A and Category C uses only.</p> <p>References to safeguarding also applying to temporary applications for development already scoped in has been removed from the table and inserted into paragraph C2 <b>(This is addressed in MAIN 25).</b></p>	
MAIN	25	C2	<p>However, it is neither practicable nor necessary for consultation to occur on all developments proposed through planning applications. The table below sets the developments proposed to be subject to consultation with the Waste Planning Authorities:</p>	<p>However, it is neither practicable nor necessary for consultation to occur on all developments proposed through planning applications. The table below sets the developments proposed to be subject to consultation with the Waste Planning Authorities: <b><u>The development types below include those relating to temporary structures and uses:</u></b></p>	<p>This provides clarity.</p>

Modification	Modification Number	Paragraph/Policy Reference	Original Text	Amendment	Justification
<b>Appendix E - Areas of Search Development Principles</b>					
MAIN	26	Map 51 – Oakwood and Crusader Business Park		Removal of Map as the site is no longer being considered as an Area of Search.	Factual update to recognise that Oakwood and Crusader Business Park is no longer an Area of Search.

### 3 Minor Modifications

**3.1** Minor modifications include factual updates, spelling/grammar errors or provide further clarity. These minor modifications are not required in order for the RWLP to be made sound.

**Table 3 Minor Modifications**

Modification	Modification Number	Paragraph/Policy Reference	Original Text	Amendment	Justification
MIN	27	Paragraph 4.11	<p><b>Low-Level Radioactive waste</b></p> <p>Radioactive wastes are categorised into nuclear and non-nuclear wastes. Nuclear wastes are from the nuclear power industry while “non-nuclear” wastes are generally from medical facilities and educational establishments.</p>	<p><b>Low-Level Radioactive waste</b></p> <p>Radioactive wastes are categorised into nuclear and non-nuclear wastes. Nuclear wastes are from the nuclear power industry while “non-nuclear” wastes are generally from medical facilities and educational establishments.</p>	This provides clarification.
MIN	28	Paragraph 4.12	<p><b>Wastewater (sewage)</b></p> <p>Comprises liquid waste discharged by domestic residences, commercial properties, industry, and agricultural activities.</p>	<p><b>Wastewater (sewage)</b></p> <p>Comprises liquid <b>and solid</b> waste discharged by domestic residences, commercial properties, industry, and agricultural activities, <b>which is then carried to Water Recycling Centres via a network of foul sewers.</b></p>	This provides clarification.

Modification	Modification Number	Paragraph/Policy Reference	Original Text	Amendment	Justification
MIN	29	Paragraph 4.16	Local Authority Collected Waste, making up approximately 20% of the total amount of waste created in the Plan area, is managed through a network of sites which comprises of the Mechanical Biological Treatment Facility at Tovi EcoPark and six supporting municipal waste transfer stations, as set out below.	Local Authority Collected Waste, making up approximately 20% of the total amount of waste created in the Plan area, is managed through a network of sites which comprises of the Mechanical Biological Treatment Facility at Tovi EcoPark, <b>a network of Recycling Centres for Household Waste and</b> six supporting municipal waste transfer stations, as set out below.	This is a factual update.
MIN	30	Paragraph 4.24	Bradwell Nuclear Power Station is a licensed Nuclear Site and is the principal source of radioactive waste arisings within the Plan area whilst the Power Station is decommissioned. At present, there is sufficient capacity for this decommissioning process.	Bradwell Nuclear Power Station is a licensed Nuclear Site and is the principal source of radioactive waste arisings within the Plan area whilst the Power Station is decommissioned. At present, there is sufficient <b>national LLW disposal capacity and sufficient local ILW interim storage</b> capacity for this decommissioning process.	This is a factual update.

Modification	Modification Number	Paragraph/Policy Reference	Original Text	Amendment	Justification
MIN	31	Paragraph 4.25	<p>Currently, wastewater treatment across Essex and Southend-on-Sea is provided via a total of 153 Wastewater Treatment Works (WWTW);</p> <p>The vast majority of WWTWs have capacity to accept wastewater from the proposed growth without the need for improvements to existing facilities;</p> <p>Sludge generated in the WWTW can be sent for further treatment for use as agricultural fertiliser or power generation. The sludge treatment strategies provided by operators, indicate that there is adequate capacity for sludge treatment and disposal during the Plan period.</p>	<p>Currently, wastewater treatment across Essex and Southend-on-Sea is provided via a total of 153 <b>Water Recycling Centres (WRC)</b> <del>Wastewater Treatment Works (WWTW)</del>;</p> <p>The vast majority of <b>WRCs</b> <del>WWTWs</del> have capacity to accept wastewater from <del>the</del> proposed growth <b>in the Plan Area</b> without the need for improvements to existing facilities;</p> <p>Sludge generated in the <b>WRC</b> <del>WWTW</del> can be sent for further treatment for use as agricultural fertiliser or power generation. The sludge treatment strategies provided by operators; indicate that there is adequate capacity for sludge treatment and disposal during the Plan period.</p>	<p>This is a factual update.</p>
MIN	32	Paragraph 4.26	<p>Progress has been made on the provision of new and more sustainable facilities in the Plan</p>	<p>Progress has been made on the provision of new and more sustainable facilities in the Plan</p>	<p>This is a factual update.</p>

Modification	Modification Number	Paragraph/Policy Reference	Original Text	Amendment	Justification
MIN	33	Paragraph 5.2	<p>area, including those provided in connection with the contracts for recycling and treatment of Local Authority Collected Waste. There remains, however, a need for further new facilities for the recycling, treatment and disposal of other waste streams.</p>	<p>area, including those provided in connection with the contracts for recycling and treatment of Local Authority Collected Waste. There remains, however, a need for further new facilities for the recycling, treatment and disposal of other waste streams. <b><u>An enhanced provision of Recycling Centres for Household Waste will also be required to reflect changes in local population and demand.</u></b></p>	<p>This provides clarification.</p>
			<p>The Plan is based on the principle of net self-sufficiency, where practicable. This means having sufficient waste transfer, recycling, recovery, and disposal capacity within the Plan area to manage the amount of waste generated, with only limited cross border movements with other authorities. Such an approach recognises that waste travels across administrative boundaries, particularly when</p>	<p>The Plan is based on the principle of net self-sufficiency, where practicable. This means having sufficient waste transfer, recycling, recovery, and disposal capacity within the Plan area to manage the amount of waste generated, with only limited cross border movements with other authorities. Such an approach recognises that waste travels across administrative boundaries, <b>particularly when</b></p>	

Modification	Modification Number	Paragraph/Policy Reference	Original Text	Amendment	Justification
			the source of the waste is located close to an administrative border.	<b><u>the source of the waste is located close to an administrative border with the distance travelled being, at least in part, related to the volume of waste required to make a facility economically viable set against the amount of waste expected to arise in a given area. The smaller the quantity of a waste type generated, the less practical it is to be net self-sufficient due to economies of scale making small, purely local facilities unviable. Particularly specialist types of waste travel beyond one or more administrative boundaries.</u></b>	
MIN	34	Paragraph 6.6	The principle of net self-sufficiency does not apply to hazardous and low-level radioactive waste. This is because the management of the relatively small amounts of such waste generated will usually take place at either the	The principle of net self-sufficiency does not apply to hazardous and <b>low-level</b> radioactive waste. This is because the management of the relatively small amounts of such waste generated will usually take place at either <b>the</b>	This is a factual update.

Modification	Modification Number	Paragraph/Policy Reference	Original Text	Amendment	Justification
			specialist facilities for a particular industry or larger facilities to meet a national or regional need.	specialist facilities for a particular industry or larger facilities to meet a national or regional need.	
MIN	35	Paragraph 7.1	This chapter sets out the policy for locating the range of waste management facilities required in the Plan Area to 2032. The Plan meets the identified need for new capacity, set in the waste management capacity gap, by allocating strategic sites.	This chapter sets out the policy for locating <del>the range</del> waste management facilities required <u>to manage waste</u> in the Plan Area to 2032. <del>The Plan meets the identified need for new capacity; set in the waste management capacity gap; by allocating strategic sites.</del> <u>Although it is recognised that capacity gaps remain in all waste streams other than for biological treatment, it is considered that all suitable sites submitted to the Waste Planning Authorities have been allocated.</u>	This is a factual update.
MIN	36	Paragraph 7.2	“The strategic site allocations meet the identified need for: <ul style="list-style-type: none"> <li>biological treatment;</li> <li>inert waste recycling;</li> <li>other waste management facilities;</li> </ul>	“ <del>The</del> Strategic site allocations meet the identified need for <u>have been made to manage the following waste streams in the Plan Area:</u> <ul style="list-style-type: none"> <li>biological waste;</li> </ul>	This clarifies the type of waste management that have been the subject of site allocations.



Modification	Modification Number	Paragraph/Policy Reference	Original Text	Amendment	Justification
			<ul style="list-style-type: none"> <li>inert landfill;</li> <li>hazardous landfill.</li> </ul>	<ul style="list-style-type: none"> <li>inert waste recycling;</li> <li>Other waste management;</li> <li>non-hazardous residual waste;</li> <li>Inert landfill;</li> <li>hazardous waste.</li> </ul>	
MIN	37	Paragraph 8.7	<p>The focus of the Areas of Search has been on employment land within industrial estates that have existing planning policy support for B2 (General Industry) and B8 (Storage or Distribution) uses under the Use Class Order. (6)Under this Order, waste management facilities are considered sui generis ('in a class of its own') and therefore do not fit under a specific use class. It is, however, considered that employment land designated for B2 and B8 uses represent the most suitable land as many waste management operations are similar in nature and impact to industrial activities and storage and distribution</p>	<p>The focus <b>of for</b> the Areas of Search has been on employment land within industrial estates that have existing planning policy support for B2 (General Industry) and B8 (Storage or Distribution) uses under the Use Class Order.(6)Under this Order, waste management facilities are <b>generally</b> considered <b>as</b> sui generis ('in a class of its own') and therefore do not fit under a specific use class. It is, however, considered that employment land designated for B2 and B8 uses represents the most suitable land as many waste management operations are similar in nature and impact to industrial activities and storage and distribution</p>	To provide further clarification.

Modification	Modification Number	Paragraph/Policy Reference	Original Text	Amendment	Justification
			facilities. Many of the Areas of Search are also near to the key centres for growth and so support the overarching Spatial Strategy. The Waste Planning Authority has a preference for waste management facilities to come forward in these locations over those which may be less suitable such as Greenfield sites or sites less well connected to main transport infrastructure or close to sensitive areas.	facilities. Many of the Areas of Search are also near to the key centres for growth and so support the overarching Spatial Strategy. The Waste Planning Authority has a preference for waste management facilities to come forward in these locations over those which may be less suitable such as Greenfield sites or sites less well connected to main transport infrastructure or close to sensitive areas.	
MIN	38	Paragraph 8.15		Redrafting of paragraph 8.15. Inclusion of a table <sup>(2)</sup> defining whether facility types are likely to be open or enclosed– See 'Appendix 6 - Paragraph 8.15'.	Paragraph re-drafted for clarity. This table has been moved from the evidence base into the Plan itself for clarification purposes.
MIN	39	Paragraph 8.23, 8.26	See 'Appendix 9 - Supporting Text and Policy 7'	See 'Appendix 9 - Supporting Text and Policy 7'	This is a factual update.

2 Table numbering to be confirmed upon adoption.

Modification	Modification Number	Paragraph/Policy Reference	Original Text	Amendment	Justification
				<ul style="list-style-type: none"> <li>Update to reflect the publication of NDA Strategy III in March 2016.</li> </ul>	
MIN	40	Paragraph 8.32	<p>In contrast to VLLW, most disposal of LLW requires a permit to be held by both the waste producer and the operator of the waste management facility that receives it. LLW can go to a landfill permitted by the Environment Agency to accept LLW for disposal, storage at the national Low Level Waste Repository (LLWR) near Drigg in Cumbria, or may be dealt with by incineration (with or without energy recovery). Only radioactive waste from the lower spectrum of LLW can be sent to permitted landfill (ie up to 200 Becquerels per gram of activity concentration). Currently, the use of the national LLWR is the conventional management route, although it has limited capacity. The site is part of the</p>	<p><b><u>Most disposal of LLW requires permits to be held by both the waste producer that consigns the waste and the operator of the waste management facility that receives it. Some LLW may go to landfills permitted by the Environment Agency to accept LLW for disposal, some to the national Low Level Waste Repository (LLWR) near Drigg in Cumbria, some to decontamination or recycling facilities in the UK or abroad and some to incineration facilities. Only radioactive waste from the lower spectrum of LLW can be sent to permitted landfill. The LLWR site, which generally receives waste higher in the LLW spectrum, is part of the NDA's estate and as such it</u></b></p>	<p>This is a factual update.</p>

Modification	Modification Number	Paragraph/Policy Reference	Original Text	Amendment	Justification
			<p>NDA's estate and as such it is covered by both the UK LLW Strategy 2010 and the NDA's own Strategy (as referred to above). For example, the NDA has diverted more than 85% of LLW away from the LLWR through a wide range of more environmentally sustainable options such as waste prevention, re-use and recycling. LLW disposal, except for that to the national LLWR, usually takes place at facilities used for the management of other types of waste, subject to regulatory permits.</p>	<p><u>is covered by both the UK LLW Strategy 2016 and the NDA's own Strategy (as referred to above). Operators within the NDA estate such as Magnox have diverted more than 85% of LLW away from the LLWR through a wide range of more environmentally sustainable options such as waste prevention, re-use and recycling. In contrast to VLLW, most disposal of LLW requires a permit to be held by both the waste producer and the operator of the waste management facility that receives it. LLW can go to a landfill permitted by the Environment Agency to accept LLW for disposal; storage at the national Low Level Waste Repository (LLWR) near Drigg in Cumbria, or may be dealt with by incineration (with or without energy recovery). Only radioactive waste from</u></p>	

Modification	Modification Number	Paragraph/Policy Reference	Original Text	Amendment	Justification
				<p>the lower spectrum of LLW can be sent to permitted landfill (ie up to 200 Becquerels per gram of activity concentration). Currently, the use of the national LLWR is the conventional management route, although it has limited capacity. The site is part of the NDA's estate and as such it is covered by both the UK LLW Strategy 2010 and the NDA's own Strategy (as referred to above). For example, the NDA has diverted more than 85% of LLW away from the LLWR through a wide range of more environmentally sustainable options such as waste prevention, re-use and recycling. LLW disposal, except for that to the national LLWR, usually takes place at facilities used for the management of other types of waste, subject to regulatory permits.</p>	

Modification	Modification Number	Paragraph/Policy Reference	Original Text	Amendment	Justification
MIN	41	Paragraph 9.21	<p>“Local amenity impact” is usually understood to mean the effect on visual and aural characteristics of the immediate neighbourhood where the proposal is located. Impacts on amenity can cover a range of potential pollution and disturbance from, for example, light, noise, dust, and odour as well as concerns of the possible effects on human health from the development.</p>	<p>“Local amenity impact” is usually understood to mean the effect <b>of the proposed development</b> on <b>the existing</b> visual and aural characteristics of the immediate neighbourhood, <b>including the impact on any residential and non-residential uses in the vicinity</b>. Impacts on amenity can cover a range of potential pollution and disturbance from, for example, light, noise, dust and odour as well as concerns of the possible effects on human health from the development.</p>	<p>To provide further clarification and a grammatical change.</p>
MIN	42	Paragraph 9.23	<p>The impact on human health is therefore a material consideration in making planning decisions. However, national policy expects that in determining applications Waste Planning Authorities should not be concerned with “the control of processes which are a matter</p>	<p>The impact on human health is <b>therefore also</b> a material consideration in making planning decisions. However, national policy expects that in determining applications, Waste Planning Authorities should not be concerned with “the control of processes which are a matter</p>	<p>To provide further clarification.</p>

Modification	Modification Number	Paragraph/Policy Reference	Original Text	Amendment	Justification
MIN	43	Paragraph 9.44	<p>for the pollution control authorities. Waste planning authorities should work on the assumption that the relevant pollution control regime will be properly applied and enforced.” If granted, planning conditions may be imposed on a planning permission to mitigate any impact on local amenity.</p>	<p>for the pollution control authorities. Waste Planning Authorities should work on the assumption that the relevant pollution control regime will be properly applied and enforced.” If <b>permission is</b> granted, planning conditions may be imposed <b>on a planning permission</b> to <b>help</b> mitigate any impact on local amenity.</p>	This is a factual update.
			<p>In 2010, Essex County Council and Southend-on-Sea Borough Council became the Lead Local Flood Authorities for the Plan Area. These authorities have responsibility for ensuring that major development proposals do not compromise the fluvial environment through the effective installation of sustainable drainage systems (SuDS). SuDS reduce the quantity and slow down the rate of the surface water run-off from sites , as well as assist in treating any pollutants as waters drain from the</p>	<p>In 2010, Essex County Council and Southend-on-Sea Borough Council became the Lead Local Flood Authorities for the Plan Area. These authorities have responsibility for ensuring that major development proposals do not compromise the <b>fluvial aquatic</b> environment through the effective installation of sustainable drainage systems (SuDS). SuDS reduce the quantity and slow down the rate of <b>the</b> surface water run-off from sites ; as well as assist in treating any pollutants as waters drain from the</p>	

Modification	Modification Number	Paragraph/Policy Reference	Original Text	Amendment	Justification
MIN	44	Table 6 Monitoring Framework	<p>development. SuDs can also contribute greatly to improving the amenity and wildlife interest of new development through the introduction of water bodies and habitats. SuDS in new development should be in the most appropriate location, be well-designed and have a continued maintenance regime to ensure their continued effectiveness.</p> <p>See 'Appendix 13 - Table 6 Monitoring Framework'</p>	<p>development. SuDs can also contribute greatly to improving the amenity and wildlife interest of new development through the introduction of water bodies and habitats. SuDS in new development should be in the most appropriate location, be well-designed and have a continued maintenance regime to ensure their continued effectiveness.</p> <p>See 'Appendix 13 - Table 6 Monitoring Framework'</p> <ul style="list-style-type: none"> <li>• Update to Indicator 1 to allow all waste streams to be monitored.</li> <li>• Removal of specific percentage targets.</li> <li>• Additional clause to Indicator 6 to allow the monitoring of non B2/B8 applications granted in land allocated for B2/B8 use.</li> </ul>	<p>These updates result in more effective monitoring indicators.</p> <p>The removal of specific percentage targets reflects the fact that these targets are no longer supported in government policy.</p>
<b>Appendix B - Development Principles</b>					



Modification	Modification Number	Paragraph/Policy Reference	Original Text	Amendment	Justification
MIN	45	Table 7 – Basildon Waste Water Treatment Works	Original title of site and associated map - Basildon Waste Water Treatment Works	Amended title of site and associated map - Basildon <b>Water Recycling Centre Waste Water Treatment Works</b>	This is a factual update.
MIN	46	Table 16 – Rivenhall	Site Allocation For: Biological and Other Waste Management Capacity	Site Allocation For: Biological and <b>Other Non-Hazardous Residual</b> Waste Management Capacity	This clarifies the type of waste management at the site.
MIN	47	Table 11 – Little Bullocks and Crumps Farm, Great and Little Canfield Table 15 – Newport Quarry	Routing	<b>Routeing</b> routing	Spelling correction.
<b>Appendix E - Areas of Search Development Principles</b>					
MIN	48	Map 22 – Festival Business Park, Basildon		See 'Appendix 20 - Festival Business Park, Basildon' Update Map to reflect that used in the Areas of Search Methodology Report	This is a factual update.

Modification	Modification Number	Paragraph/Policy Reference	Original Text	Amendment	Justification
MIN	49	Map 39 – Land off Axial Way, Myland, Colchester		See 'Appendix 21 - Land off Axial Way, Colchester' Boundary updated	This is a factual update, taking into account recent planning permissions.
MIN	50	Map 41 – Tollgate, Stanway, Colchester		See 'Appendix 22 - Tollgate, Stanway, Colchester' Boundary updated	This is a factual update, taking into account recent planning permissions.
MIN	51	Map 43 – Langston Road/Oakwood Hill, Loughton, Epping Forest		See 'Appendix 23 - Langston Road/Oakwood Hill, Loughton, Epping Forest' Boundary updated.	This is a factual update, taking into account recent planning permissions.
<b>Appendix F - Glossary</b>					
MIN	52	"Residual Waste"	No previous definition.	<u>'Residual Waste' is waste that has undergone treatment of some kind, with treatment being that as defined under the European Landfill Directive 1999/31/EC. The Directive defines "treatment" as "physical, thermal, chemical or biological processes, including sorting.</u>	This clarifies the term used within the Plan.

Modification	Modification Number	Paragraph/Policy Reference	Original Text	Amendment	Justification
				<u>that change the characteristics of the waste in order to reduce its volume or hazardous nature, facilitate its handling or enhance recovery”.</u>	
MIN	53	“Water Bodies”	No previous definition.	<u>Collective term for water within watercourses (rivers, ditches, drains), groundwater (held in geological strata such as chalk) and surface water (ponds, lakes, coastal waters).</u>	This clarifies the term used within the Plan.



## Appendices



## Appendix 1 - The Waste Challenge at a Glance

### 4.21 Non Hazardous Waste

There has been and will continue to be cross boundary movements of waste. It has been identified within planning practice guidance that Greater London net imports of non-hazardous waste to the Plan area requires specific consideration. It is estimated that in total the net exports to the plan area from Greater London are estimated to be 4.92mtpa until 2026, with net importation from London having ceased by 2026 according to the adopted London Plan 2045;

There has been and will continue to be cross - boundary movements of waste. Planning Practice Guidance states that imports of waste from Greater London require specific consideration. The Vision & Strategic Objectives of this Plan therefore recognises the need to continue to make provision for imports from London, albeit at a reducing rate. After 2026, imports of non-hazardous waste to landfill should only be of non-recyclable and non-biodegradable wastes, while some provision may also be made for the management of residues suitable for energy recovery at consented plant.

Non-organic, non-hazardous waste arisings within the Plan area are expected to moderately increase during the Plan period. In 2015, it was estimated there **was** were 1.57mt of this type of waste arising in the **P**lan area. By 2031/32, arisings are estimated to be 1.67mtpa. Imports of non-hazardous waste from London have been estimated to be in the region of 375,000 tpa in the early years of the Plan reducing down to around 150,000 tpa at the end of the Plan period.

Organic non-hazardous waste arisings within the Plan area are also expected to increase slightly during the Plan period. In **2014 2015**, it was estimated that there was 331,000t of organic non-hazardous waste arising in the Plan area. By 2031/32, arisings are estimated to be 349,000tpa. Consented operational capacity **will is expected to** decline from 221,000tpa to 131,000tpa should no further planning permissions be granted **over the Plan period**. Consequently there **is will be** a requirement for **247,000 218,000tpa** of new organic treatment capacity by 2031/32;

At present, the Waste Disposal Authority is **considering exploring** long term **management** options **surrounding the final destination** for the stabilised residual waste output of the Tovi Eco Park Facility. **In 2016**, **Currently** the **annual** 200,000t output **of the from this** facility **is was** exported from the Plan area. **A competitive tender process will identify the long-term management solution for this waste, which could include continued exportation from the Plan area. However, in line with: In line with the Plan's Strategy for the Plan area to become net self-sufficient with regard to its waste management needs where practicable,** the Plan includes a site allocation which **has capacity to potentially manage this could accommodate this residual** waste **in the Plan area in the longer term.**

Assuming **the that suitable facilities are delivered on the sites** allocated in **the this Plan are all successfully delivered**, it is **forecasted** that **there will be a surplus capacity of some** non-hazardous landfill void space **will exist at the end of the Plan period**. However, in accordance with the waste hierarchy, **this remains the option of last resort and** is not considered to be a substitute for **developing further identifying additional** treatment capacity **that will move waste up the hierarchy**.

#### 4.22 Construction, Demolition and Excavation Waste

It is estimated that local Construction, Demolition and Excavation waste arisings was 3.62mtpa in 2014 (including 0.31mt of **waste imported from** London's **projected needs**).

It is identified that there is a need for an additional **4.5 1.95**mtpa of Construction, Demolition and Excavation **waste-recovery management** (recycling or disposal) capacity by 2031/32, partly due to the **expiry expiration** of existing temporary planning permissions.

Locally collected evidence suggests that there is further diversion from landfill through beneficial re-use of inert waste, which equated to approximately 765,000tpa in 2014.

It is estimated that there is a current inert landfill void space of approximately **3.4 3.25** million m<sup>3</sup>, which would equate to approximately **5.1 4.8**-million tonnes of **GDE-disposal** capacity. This is, however, not sufficient to accommodate the forecasted need for inert **landfill waste management capacity** over the Plan period, **to accommodate both the needs of the Plan Area and the inert waste projected to be imported from London**. To address this, **sites capable of providing 640,000tpa** of inert waste recycling capacity and **9.52million-m<sup>3</sup> of inert waste disposal capacity landfill sites capable of accommodating 14.08 million tonnes in total** are allocated in the Plan. **It is, however, recognised that a proportion of the total inert waste recycling capacity is temporary in nature, and without further permissions, the total inert recycling capacity is likely to reduce to 340,000tpa at the end of the Plan period.**

**Nonetheless, even after the allocation of all sites suitable for inert waste recycling and inert waste landfill. Following the above allocations**, there is a further need to **find management solutions** for a total of **2.58mt 7.05mt** of inert waste. **Since no** **No** other submitted **sites proposals** have been deemed suitable for the management of inert waste in the Plan area, **although** locational criteria policies **provide the means by which would be used to assess any additional** future inert waste management proposals. **can will be assessed**.

#### 4.23 Hazardous Waste

**In 2014**, most of the 113,000tpa of hazardous waste requiring management is exported from the Plan area **for final management. Of this, around 23,000 tpa was disposed to landfill.**



The only landfill accepting hazardous waste (Stable Non-Reactive Hazardous Waste -SNRHW) within the Plan area closed in April 2014, so **in 2016** waste **was is-being** disposed of at sites beyond the Plan area. This facility, on average, accepted approximately 50,000 tonnes of SNRHW per annum, which included imports from other authority areas as well as waste generated within the Plan area.

Hazardous waste is not subject to net self-sufficiency within this Plan due to the specialist nature of the **waste facility type** and the **relatively** small quantities generated within the Plan area.

A new **disposal** site **for a Stable Non-Reactive Hazardous Waste Landfill** with **a total** capacity for 30,000 tonnes **per annum of Stable Non-Reactive Hazardous Waste Landfill** is allocated in the Plan. No other proposals for the management of hazardous waste in the Plan area were submitted. Locational criteria policies **would be used to assess any** future hazardous waste proposals **provide the means by which will be assessed**; should the market identify a need for further facilities in the Plan area.

## Appendix 2 - Policy 1

### Policy 1

#### Need for Waste Management Facilities

In order to meet the future needs of the Plan area, waste development will be permitted to meet the shortfall in capacity of:

- a. up to ~~247,000~~ **218,000** tonnes per annum by 2031/32 of biological treatment for non-hazardous organic waste;
- b. up to ~~4.5~~ **1.95** million tonnes per annum by 2031/32 for the management of inert waste;
- c. up to 200,000 tonnes per annum by 2031/32 for the **further management of non-hazardous residual waste other waste**; and
- d. up to 50,250 tonnes per annum by 2031/32 for the management of hazardous waste.

## Appendix 3 - Supporting Text and Policy 2

### Waste Consultation Areas

6.7 Safeguarding will be implemented through Waste Consultation Areas which are defined around all permitted waste developments (as indicated in the Authority Monitoring Report) and sites allocated in this Plan. Proposed development, including that proposed in Local Plans, within 250m of a safeguarded site (or 400m of a Water Recycling Centre - WRC) will be subject to consultation with the Waste Planning Authority. Waste Consultation Areas will be communicated to the Essex and Southend-on-Sea District/Borough and City Councils. Sensitive uses should not be located adjacent to, or within, 250 metres (or 400m of a WRC) of any part of a safeguarded site. However, the actual buffer needed around each site will depend upon the nature of the proposed 'sensitive' use and on the specific impacts of the current waste operation.

6.8 There will be instances where a proposed non-waste use may not be considered unlikely to compromise the operation of an existing or future waste management facility operating within that safeguarded site. As such, Table 21 'Development in Waste Consultation Area' sets out those development types which, when coming forward in Waste Consultation Areas, the Waste Planning Authority would not need to be consulted upon.

6.9 Existing and allocated waste sites and infrastructure will be protected from inappropriate neighbouring developments that may prejudice their continuing efficient operation. Waste development is not normally a high-value use in comparison with other land uses and as such the existing and allocated sites and facilities are safeguarded as they make an important contribution to the management of waste arising in Essex and Southend-on-Sea. Without a safeguarding policy, sites required to achieve a sustainable distribution of waste management facilities could be lost to other development. Sites covered by this policy that become vacant or where the existing waste use ceases operation, will continue to be subject to safeguarding.

**6.10** In some cases, the potential adverse impact on loss of a waste site or operation of a waste facility may **not be contested by the WPA's. Such instances could include scenarios where be acceptable, or example, where it would enable the implementation of a town-centre improvement strategy and** it can be ascertained that there are wider social, environmental and/or economic benefits resulting from **new development that may such a scheme** outweigh the retention of the waste use. In such instances, alternative site provision for the displaced waste use could **will** be required should such capacity continue to be necessary.

**6.11** Whilst Waste Consultation Zones apply to all permitted waste facilities in the Plan area, the WPAs are unlikely to object to development in close proximity to a small scale, non-specialist facilities, defined in this Plan as those with an annual capacity of 10,000tpa or less.

**6.11 6.12** The identification of alternative provision could be made by the relevant Local Planning Authority, the applicant for the non-waste development or potentially be considered through a focused review of this Waste Local Plan. This aims to ensure that no shortfall in equivalent waste management capacity occurs in Essex and Southend-on-Sea during the Plan period. **Any** ~~The~~ loss of waste capacity in the Plan area will be monitored through the Annual Monitoring Report.

6.13 The network of Local Authority Collected Waste facilities comprising the Integrated Waste Management Facility at Tovi EcoPark, Basildon and the six supporting transfer stations are integral for the sustainable management of household waste arising in the Plan area. As such, these sites (listed in Existing Waste Management Capacity, Table 3) are to be safeguarded unless it can be demonstrated that they are no longer required for the delivery of the Joint Municipal Waste Management Strategy.

6.14 Waste management infrastructure includes facilities such as wharves and railheads, which play an important role in the movement of waste materials. All current and any future facilities that come forward for this purpose during the plan period will be safeguarded under this policy.

## Policy 2

### Safeguarding Waste Management Sites and Infrastructure

#### Waste Consultation Areas

Where non-waste development is proposed within 250m of safeguarded sites, **or within 400m of a WRC**, the relevant Local Planning Authority is required to consult the Waste Planning Authority on the **planning application proposed non-waste development** (except for those developments defined as 'Excluded' in 'Appendix C - Development Excluded from Safeguarding Provisions').

**Proposals which are considered to have the potential to adversely impact on the operation of a safeguarded waste site or infrastructure, including the site allocations within this Plan, are unlikely to be opposed where:**

**Non-waste development that would adversely impact on the operation of a safeguarded waste site or infrastructure (including site allocations within this Plan) could give rise to objection by the Waste Planning Authority unless:**

- a. a temporary permission for a waste use has expired, or the waste management use has otherwise ceased and the site or infrastructure is **considered** unsuitable for a subsequent waste use; or

- b. redevelopment of the **waste** site or loss of the **waste** infrastructure would form part of a strategy or scheme that has wider **environmental**, social and/or economic benefits that **clearly** outweigh the retention of the site or the infrastructure for **the** waste use, and alternative provision is made for the displaced waste use; or
- c. a suitable replacement site or infrastructure has otherwise been identified and permitted.

**~~Where proposed non-waste development gives rise to an objection from the Waste Planning Authority, it is expected that the proposed development would not be permitted.~~**

## Appendix 4 - Policy 3

### Policy 3

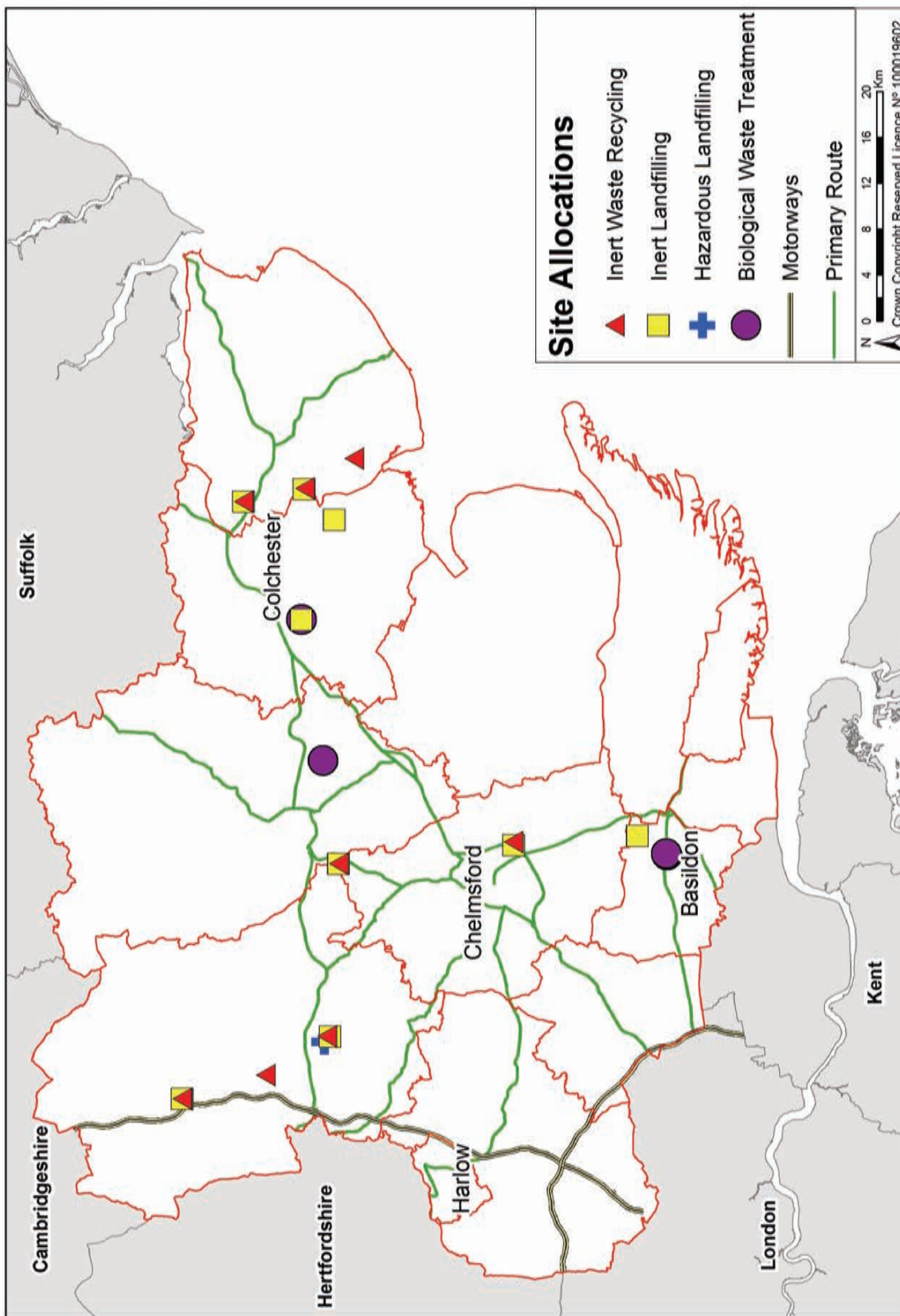
#### Strategic Site Allocations

Waste management development at the following locations (see Strategic Site Allocations Map) will be permitted **as follows and where proposals take into account the requirements identified in the relevant development principles: ~~(Allocated Sites: Development Principles)~~**:

1. For biological waste management at:
  - Bellhouse Landfill Site, Colchester (**Reg 18 ref: W29**);
  - Basildon **Water Recycling Centre Waste Water Treatment Works**, Basildon (**Reg 18 ref: W3**);
  - Courtauld Road, Basildon (**Reg 18 ref: W20**); and
  - Rivenhall, Braintree (**Reg 18 ref: IWMF2**).
2. For inert waste recycling at:
  - Crumps Farm, Gt and Lt Canfield, Uttlesford (**Reg 18 ref: W32**);
  - Eisenham, Uttlesford (**Reg 18 ref: W8**);
  - Sandon East, Chelmsford (**Reg 18 ref: W7**);
  - Slough Farm Ardleigh, Tendring (**Reg 18 ref: L(n)1R**);
  - Blackley Quarry, Gt Leighs, Chelmsford (**Reg 18 ref: L(i)10R**);
  - **Sunnymead, Elmstead & Heath Farms, Tendring (W36)**;
  - **Wivenhoe Quarry Plant Area; Tendring (Reg 18 ref: W43)**;
  - Morses Lane - Brightlingsea, Tendring (**Reg 18 ref: W31**); and
  - Newport Quarry, Uttlesford (**Reg 18 ref: L(i)17R**).
3. For **other residual non-hazardous** waste management at:
  - Rivenhall, Braintree (**Reg 18 ref: IWMF2**).

4. For inert landfill at:
- Little Bullocks Farm, Great and Little Canfield, Uttlesford (~~Reg-18-ref: L(n)7R~~);
  - Slough Farm, Ardleigh, Tending (~~Reg-18-ref: L(n)1R~~);
  - Blackley Quarry, Gt Leighs, Chelmsford (~~Reg-18-ref: L(i)10R~~);
  - Sandon, Chelmsford(~~Reg-18-ref: L(i)6~~);
  - Sunnymead, Elmstead & Heath Farms, Tending (~~Reg-18-ref: L(i)5~~);
  - Newport Quarry, Uttlesford (~~Reg-18-ref: L(i)17R~~);
  - Bellhouse Landfill Site, Colchester (~~Reg-18-ref: L(n)5~~);
  - Fingringhoe Quarry, Colchester (~~Reg-18-ref: L(i)15~~);
  - [Dollymans Farm, Basildon/Rochford \(L\(i\)16\)](#);
5. For hazardous landfill at:
- Little Bullocks Farm, Great and Little Canfield, Uttlesford (~~Reg-18-ref: L(n)8R~~).

Map 5 Strategic Site Allocations





## Appendix 5 - Policy 4

### Policy 4

#### Areas of Search

**Proposals for waste management development in the following locations will be permitted:**

**Proposals for waste management development in the following Areas of Search, as defined on the Policies Map, will be supported in principle provided that the design and use of the facility is compatible with existing uses in the employment area.**

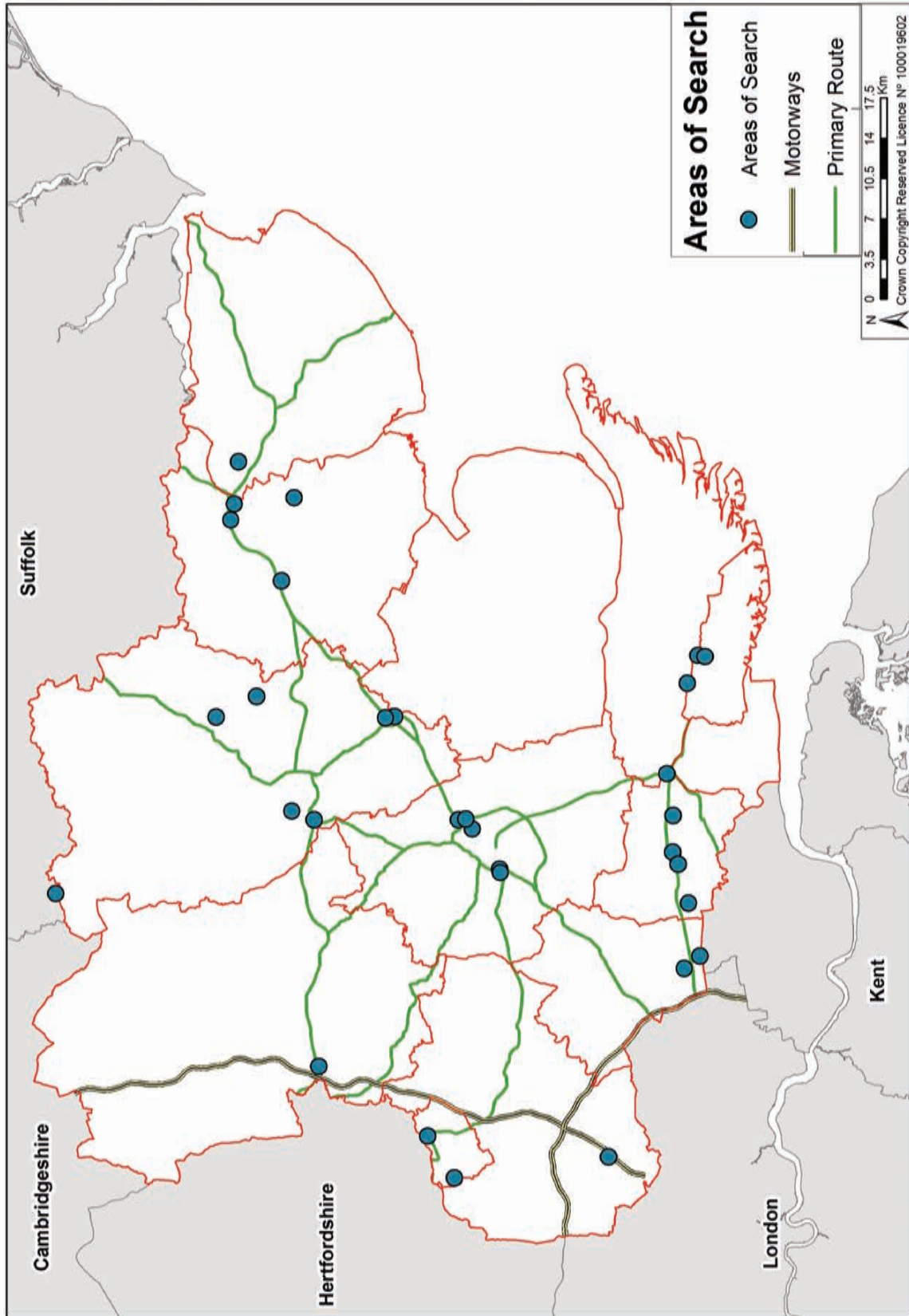
**Proposals for waste management will be considered against other relevant policies of this Plan and the wider Development Plan.**

**Table 4**

Area of Search	District	Area of Search	District
Burnt Mills Central	Basildon	Westways	Chelmsford
Festival Business Park	Basildon	Widford Industrial Estate	Chelmsford
Pipps Hill	Basildon	Land off Axial Way, Myland	Colchester
Southfield Business Park	Basildon	Severalls Industry Park	Colchester
Bluebridge Industrial Estate	Braintree	Tollgate, Stanway	Colchester
Earls Colne Airfield	Braintree	Whitehall Road Industrial Estate	Colchester
Eastways-Crittall Road, Waterside Park	Braintree	Langston Road/Oakwood Hill, Loughton	Epping Forest
Freebournes Industrial Estate	Braintree	Pinnacles and Roydenbury Industrial Estate	Harlow
Skyline 120	Braintree	Temple Fields	Harlow

Area of Search	District	Area of Search	District
Springwood Industrial Estate	Braintree	Rochford Business Park	Rochford
Sturmer Industrial Estate Area 1	Braintree	Michelins Farm	Rochford
Childerditch Industrial Estate	Brentwood	Stock Road	Southend-on-Sea
West Horndon	Brentwood	Temple Farm	Southend-on-Sea
Drovers Way	Chelmsford	Martell's Farm Industrial Area	Tendring
Dukes Park Industrial Estate	Chelmsford	<del>Oakwood and Crusader Business Park</del>	<del>Tendring</del>
Springfield Business Park	Chelmsford	Start Hill, Great Hallingbury	Uttlesford

Map 6 Areas of Search



## Appendix 6 - Paragraph 8.15

8.15 Waste management development can, depending on its type, be delivered in either enclosed or open facilities. separated into two broad categories, those known as 'enclosed facilities' where waste is processed inside a building. Enclosed facilities can be broadly similar in appearance to other industrial processes developments such as factories which take place within warehouses. Some examples are listed in the table below. of enclosed waste facilities include in-vessel composting, anaerobic digestion and thermal treatment developments. The other category is open facilities, which although occasionally are can also be partially enclosed, largely deal with waste in the open air. Examples of open waste facilities include inert waste recycling and open windrow composting developments.

Table xx - <sup>(3)</sup>Waste Facility Types

<u>Broad Waste Facility Type</u>	<u>Example Waste Facility</u>
<u>Enclosed Waste Facilities (housed in buildings)</u>	<u>Transfer Station</u>
	<u>Storage</u>
	<u>Materials Recovery Facility (MRF)</u>
	<u>Metal Recycling Facility</u>
	<u>End of Life Vehicle (ELV) Recycling Facilities</u>
	<u>In-vessel Composting Facility</u>
	<u>Mechanical Biological Treatment Facility (MBT)</u>
	<u>Combined Heat and Power Facilities (CHP)</u>
	<u>Gasification and Pyrolysis Facilities</u>
	<u>Anaerobic Digestion (AD)</u>
<u>Autoclaving Facilities</u>	

3 Table numbering to be confirmed upon adoption.

<p><u>Open Air Facilities</u></p>	<p><u>Construction, Demolition and Excavation (CD&amp;EW) Recycling Facilities (or inert recycling)</u></p>
	<p><u>Metal Recycling Facility</u></p>
	<p><u>End of Life Vehicle (ELV) Recycling Facilities</u></p>
	<p><u>Windrow Composting Facilities</u></p>
	<p><u>Water Recycling Facilities (WRCs)</u></p>
	<p><u>Inert Landfill Sites</u></p>
	<p><u>Non-Hazardous Landfill Sites</u></p>
	<p><u>Hazardous Landfill Sites</u></p>

## Appendix 7 - Policy 5

### Policy 5

#### Enclosed Waste Facilities on Unallocated Sites or Outside Areas of Search

Proposals for new enclosed waste management facilities will be permitted where:

1. the waste site allocations ~~or~~ **and** the Areas of Search in this Plan are shown to be unsuitable ~~and~~ for unavailable for the proposed development;
2. **although not exclusively**, a need for the capacity of the proposed development has been demonstrated to manage waste arising from within the administrative areas of Essex and Southend-on-Sea;
3. it is demonstrated that the site is at least as suitable for such development as Site Allocations or Areas of Search, with reference to the overall spatial strategy and site assessment methodology associated with this Plan.

In addition, proposals should be located at or in:

- a. employment areas that are existing or allocated in a Local Plan for general industry (B2) and storage and distribution (B8); or
- b. existing permitted waste management sites or co-located with other waste management development; or
- c. the same site or co-located in close proximity to where the waste arises; or
- d. the curtilages of Waste Water Treatment Works (in the case of biological waste); or
- e. areas of Previously Developed Land; or
- f. redundant agricultural or forestry buildings and their curtilages (in the case of green waste and/or biological waste).

Proposals for energy recovery facilities with combined heat and power are expected to demonstrate that the heat produced will be supplied to a district heat network or direct to commercial or industrial users.

Any proposals that come forward on land use types not identified above will be assessed on their merits, based on the policies in **this Plan**, **the adopted RWLP. Such locations will be considered less favourably than those set out within this Policy.**

## Appendix 8 - Policy 6

### Policy 6

#### Open Waste Facilities on Unallocated Sites or outside Areas of Search

Proposals for new open waste management facilities will be permitted where:

1. the waste site allocations **or** **and** the Areas of Search in this Plan are shown to be unsuitable ~~and/or~~ unavailable for the proposed development;
2. **although not exclusively**, a need for the capacity of the proposed development has been demonstrated to manage waste arising from within the administrative areas of Essex and Southend-on-Sea;
3. it is demonstrated that the site is at least as suitable for such development as Site Allocations or Areas of Search, with reference to the overall spatial strategy and site assessment methodology associated with this Plan.

In addition, proposals should be located at or in:

- a. redundant farm land (in the case of green waste and/or biological waste); or
- b. demolition and construction sites, where the inert waste materials are to be used on the construction project on that site; or
- c. existing permitted waste management sites or co-located with other waste management development; or
- d. the curtilages of Waste Water Treatment Works (in the case of biological waste); or
- e. mineral and landfill sites where waste material is used in conjunction with restoration, or proposed waste operations are temporary and linked to the completion of the mineral/landfill operation; or
- f. areas of Previously Developed Land; or
- g. employment areas that are existing or allocated in a Local Plan for general industry (B2) and storage and distribution (B8).

Any proposals that come forward on land use types not identified above will be assessed on their merits, based on the policies in **this Plan**. ~~the adopted RWLP. Such locations will be considered less favourably than those set out within this Policy.~~

## Appendix 9 - Supporting Text and Policy 7

### Nuclear Radioactive Waste

8.21 Bradwell-on-Sea Nuclear Power Station is a licensed Nuclear Site and is the principal source of radioactive waste arisings within the Plan area whilst the Power Station is decommissioned.

8.22 The nuclear waste arisings from this process comprise Very Low Level (VLLW), Low Level (LLW) and Intermediate Level (ILW) Radioactive Wastes. A key element of the decommissioning is to manage the waste arising, to enable the waste to be safely retrieved from the facility, stored and processed whilst having regard to the level of radioactivity and long term options available.

8.23 ~~The Bradwell-on-Sea site is the first site operated by Magnox within the Government's "Nuclear Decommissioning Authority (NDA)" to be decommissioned, and this is within an accelerated programme to deliver the "care and maintenance" stage in 2016/17. At this stage the site would be cleared and secured as appropriate, including the storage of LLW within a dedicated on-site long-term ILW Storage facility. The ILW will remain in the store until a national Geological Disposal Facility is available to receive the packages. This process is in accordance with DECC's UK's waste management strategy for LLW & ILW (dated 2010). The Bradwell-on-Sea site is one of the first UK nuclear reactor sites to be decommissioned. Within the period covered by this policy document, the site will enter into an extended period of care and maintenance prior to which the site will be secured as appropriate, and packaged ILW placed in storage within the dedicated on-site interim ILW Storage facility. The packaged ILW will remain in the store until a national Geological Disposal Facility (GDF) is available to receive the packages. This process is in accordance with DECC's UK's waste management strategy for LLW & ILW (dated 2010). Following the extended period of care and maintenance, the site will be decommissioned and remediation activities undertaken which when completed will allow the site to reach end state and enable the next planned use.~~

8.24 The Government is separately pursuing its strategy (Implementing Geological Disposal: A framework for the long-term management of higher activity radioactive waste, 2014) for a long term national Geological Disposal Facility (GDF) which is scheduled to be operational by 2040. It proposes a range of activities to be taken forward between 2014 and 2016 to set the framework for the GDF site selection process. The GDF is a "Nationally Significant Infrastructure Project" (NSIP) and the future siting is still to be determined. NSIPs are a national consideration and therefore outside of the remit of the RWLP.

8.25 It is noted that although the Plan cannot rule out any type of development, it was held in the Waste Local Plan 2001 that the geology of the Plan area does not support the disposal and containment of nuclear waste and that it was therefore likely that any such facility would be located beyond the Plan area. However, evidence contained in the Radioactive Waste Management Ltd consultation on 'National Geological Screening Guidance – Providing information on Geology' (September 2015) indicates that there is not a specific type of geology to accommodate



a national GDF. This is due to the number of possible design solutions to accommodate different types of geology and the respective safety issues. The location of a GDF will be addressed through a public consultation, managed by Government, to determine an appropriate strategy. Any new GDF will receive the ILW waste that is currently stored at Bradwell-on-Sea.

**8.26 The NDA was established as a Non-Departmental Public Body under the Energy Act (2004) to ensure that the UK's nuclear legacy sites are decommissioned and cleaned up safely, securely, cost-effectively and in ways that protect people and the environment. The NDA is responsible for developing nuclear decommissioning plans and implementing them through an estate-wide strategy. The Strategies are to develop a clear understanding of what is required to deliver the decommissioning agenda with a strategic focus and coherent approach to decommissioning. The third Strategy "NDA Strategy III" is to be published for consultation in January 2016 and takes into account best practice and new procedures as a result of de-commissioning activities at Bradwell-on-Sea and other licenced sites across the UK. This includes the application of the Waste Hierarchy to reduce the quantity of waste to be disposed. The NDA was established as a Non-Departmental Public Body under the Energy Act (2004) to ensure that the UK's nuclear legacy sites are decommissioned and cleaned up safely, securely, cost-effectively and in ways that protect people and the environment. The NDA is responsible for developing nuclear decommissioning plans and implementing them through an estate-wide strategy. The Strategies are to develop a clear understanding of what is required to deliver the decommissioning agenda with a strategic focus and coherent approach to decommissioning. The third Strategy "NDA Strategy III" was published in April 2016 and takes into account best practice and new procedures as a result of de-commissioning activities at Bradwell-on-Sea and other licenced sites across the UK. Proposals that are consistent with the current strategy (or its subsequent revisions) will be supported in line with Policy 7. This includes the application of the Waste Hierarchy to reduce the quantity of waste to be disposed and the beneficial reuse of material and waste to achieve the site end state and enable the next planned use.**

8.27 The Government's National Policy Statement (NPS) for Nuclear Power Generation<sup>(4)</sup> is considering the Bradwell-on-Sea site, alongside seven other sites nationally, for future nuclear energy development. If the Bradwell-on-Sea site is selected as one of the suitable sites for nuclear energy development, then there would be further arisings of ILW in the Plan area. The fate of these materials ultimately depends upon the progress of the GDF and would need to be considered in the context of future national policy.

8.28 Given the formative status of this process any potential waste arisings cannot be planned for at this stage. Such a new nuclear power station would be considered an NSIP and therefore outside of the remit of this Plan.

4 Two volumes: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/47859/2009-nps-for-nuclear-volumel.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/47859/2009-nps-for-nuclear-volumel.pdf)  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/37052/1943-nps-nuclear-power-annex-vollll.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/37052/1943-nps-nuclear-power-annex-vollll.pdf)

## Policy 7

### Radioactive Waste Management ~~Nuclear Waste Treatment and Storage at Bradwell-on-Sea~~

Proposals for facilities for the **management** ~~treatment and/or storage~~ of nuclear radioactive Intermediate Level Waste (ILW), Low Level Waste (LLW) or Very Low Level Waste (VLLW) will **be supported** ~~only be acceptable~~ within the Nuclear Licensed Areas at Bradwell-on-Sea, where:

- a. the proposals are consistent with the national strategy for managing ILW, LLW and VLLW as well as the decommissioning plans for the Bradwell-on-Sea power station;
- b. the proposals are informed by the outcome of economic and environmental assessments that support and justify the management of **radioactive decommissioned nuclear** waste **at this location on-site**; and;
- c. the proposals would not cause any unacceptable adverse impacts to the environment, human health or local amenity.

## Appendix 10 - Policy 9

### Policy 9

#### Waste Disposal Facilities on Unallocated Sites

Proposals for landfill facilities will be permitted where:

1. the landfill site allocations in this Plan are shown to be unsuitable ~~and~~ or unavailable for the proposed development;
2. **although not exclusively**, a need for the capacity of the proposed development has been demonstrated to manage waste arising from within the administrative areas of Essex and Southend-on-Sea;
3. it is demonstrated that the site is at least as suitable for such development as the landfill site allocations, with reference to the site assessment methodology associated with this Plan; and
4. that the proposed landfill has been demonstrated to be the most appropriate and acceptable development in relation to the Waste Hierarchy.

in addition, preference will be given to proposals:

- a. for the restoration of a preferred or reserve site in the Minerals Local Plan; or
- b. for an extension of time to complete the permitted restoration within the boundary of an existing landfill site.

Proposals for non-inert landfill are required to demonstrate the capture of landfill gas for energy generation by the most efficient means.

Any proposals that come forward on land use types not identified above will be assessed on their merits, based on the policies **in this Plan**. ~~the adopted RWLP. Such locations will be considered less favourably than those set out within this Policy.~~

## Appendix 11 - Policy 10

### Policy 10

#### Development Management Criteria

Proposals for waste management development will be permitted where it can be demonstrated that the development would not have an unacceptable impact (including cumulative impact in combination with other existing or permitted development) on:

- a. local amenity (including noise levels, odour, air quality, dust, litter, light pollution and vibration);
- b. the quality and quantity of water within water courses, groundwater and surface water; the quality of water within water bodies, with particular regard to:
  - preventing the deterioration of their existing status; or
  - failure to achieve the objective of 'good status'; and
  - the quantity of water for resource purposes within water bodies'
- c. the capacity of existing drainage systems;
- d. the best and most versatile agricultural land;
- e. farming, horticulture and forestry;
- f. aircraft safety due to the risk of bird strike and/or building height and position;
- g. the safety and capacity of the road and other transport networks;
- h. the appearance, quality and character of the landscape, countryside and visual environment and any local features that contribute to its local distinctiveness;
- i. the openness and purpose of the Metropolitan Green Belt;
- j. Public Open Space, the definitive Public Rights of Way network and outdoor recreation facilities;
- k. land stability;
- l. the natural and geological environment (including internationally, nationally or locally designated sites and irreplaceable habitats);
- m. the historic environment including heritage and archaeological assets and their settings; and
- n. the character and quality of the area, in which the development is situated, through poor design.

Where appropriate, enhancement of the environment would be sought, including, but not exclusively, the enhancement of the Public Rights of Way network, creation of recreation opportunities and enhancement of the natural, historic and built environment and surrounding landscape.

## Appendix 12 - Policy 12

### Policy 12

#### Transport and Access

Proposals for waste management development will be permitted where it is demonstrated that the development would not have an unacceptable impact on the efficiency and effective operation of the road network, including safety and capacity, local amenity and the environment.

Proposals for the transportation of waste by rail and/or water will be encouraged subject to other policies in this Plan. Where transportation by road is proposed, this will be permitted where the road network is suitable for use by Heavy Goods Vehicles or can be improved to accommodate such vehicles.

The following hierarchy of preference for transportation will be applied:

- a. the transport of waste by rail or water;
- b. where it is demonstrated that (a) above is not feasible or practicable, access will be required to a suitable existing junction with the main road network (not including secondary distributor roads, estate roads and other routes that provide local access), via a suitable section of existing road, as short as possible, without causing a detrimental impact upon the safety and efficiency of the network; or
- c. where it is demonstrated (b) above is not feasible, direct access to the main road network involving the construction of a new access and/or junction where there is no suitable existing access point and/or junction; or
- d. **Where access to the main road network in accordance with (b) and (c) above is not feasible, road access via a suitable existing road prior to gaining access onto the main road network will exceptionally be permitted, having regard to the scale of the development, the proximity of sensitive receptors, the capacity of the road and an assessment of the impact on road safety.**

## Appendix 13 - Table 6 Monitoring Framework

Table 6 The Monitoring Framework

Indicator	Related Policy/Strategic Objective	Target	Data Source	Trigger Level(s)
<p>1</p> <p><b>Amount of Local Authority Collected Waste, Commercial, Industrial and GD&amp;E-waste diverted from Landfill</b> <b>Amount of waste arisings, split by waste stream, in the Plan Area</b></p>	<p>Strategic Objectives: 1,2 &amp; 5</p> <p>Policy 1</p>	<p>The adopted national targets as specified in the National Waste Management Plan for England (2013) as based on the WFD:</p> <ul style="list-style-type: none"> <li>Household Waste –50% by 2020 to be recycled</li> <li>Biodegradable Non-hazardous waste landfill diversion of 35% of the 1995 level by 2020;</li> <li>CD&amp;E Waste – 70% by weight need to be recycled/diverted from landfill by 2020.</li> </ul> <p><b><u>Waste arisings in line with forecasts from evidence base</u></b></p>	<p>Waste Disposal Authority</p> <p>Environment Agency - Waste Data Interrogator</p>	<p>Waste arisings not in line with waste forecasts. Failure to achieve a national target.</p>

Indicator	Related Policy/Strategic Objective	Target	Data Source	Trigger Level(s)
<p>6</p> <ul style="list-style-type: none"> <li>a. Number of new waste facilities delivered in accordance with Areas of Search designations</li> <li>b. Number of waste facilities delivered on non-designated industrial land</li> <li>c. <u>Area of land within Areas of Search permitted for non B2/B8 development</u></li> </ul>	<p>Strategic Objectives: 3 &amp; 4</p> <p>Policy: 2, 5, 6, 7, 8 &amp; 9</p>	<p>Permissions granted in accordance with Area of Search designations.</p>	<p>Planning Applications and Decisions</p>	<p>Waste development on Areas of Search not coming forward for development.</p> <p>A significant number of non designated industrial areas are developed.</p> <p><u>Any loss of land designated as an Area of Search.</u></p>



## Appendix 14 - Table 11 Little Bullocks and Crumps Farm, Great and Little Canfield

Table 11 Little Bullocks and Crumps Farm, Great and Little Canfield

<b>District</b>	Uttlesford
<b>Area</b>	7.77 <b>6.90</b> ha - Site 1 6.15ha - Site 2 3.52 ha - Site 3
<b>Indicative Facility Scale</b>	420,000m <sup>3</sup> - Inert Landfill (Site 1) 45,000m <sup>3</sup> - Hazardous Landfill (Site 2) 80,000tpa - Inert Recycling Capacity (Site 3)
<b>Link to Waste and Mineral Activities</b>	Site 1 is allocated for extraction within the MLP 2014 as site A22. Site 2 is allocated for extraction within the MLP 2014 as site A23.
<b>Site Allocation For</b>	Inert Landfill Capacity (Site 1) Hazardous Landfill Capacity (Site 2) Inert Waste Recycling Capacity (Site 3)
<b>Access</b>	Via haul road through existing Crumps Farm site to B1256

<p><b>Estimated Availability</b></p>	<p>Site 1 - 5 to 10 years</p> <p>Site 2 - Upon adoption of RWLP</p> <p>Site 3 <b>5 to 10 years</b> would be brought forward, during the Plan period at an appropriate stage to ensure that it could be operated within the context of the existing Major Waste Management Facility at Crumps Farm.</p>
<p><b>Life</b></p>	<p>Site 1 - 12 years</p> <p>Site 2 - <del>30 years</del> <b>15 years</b></p> <p>Site 3 - <del>Permanent</del> <b>15 years</b></p>

These sites would be extensions to the existing mineral/waste site at Crumps Farm. The following issues apply to all three sites:

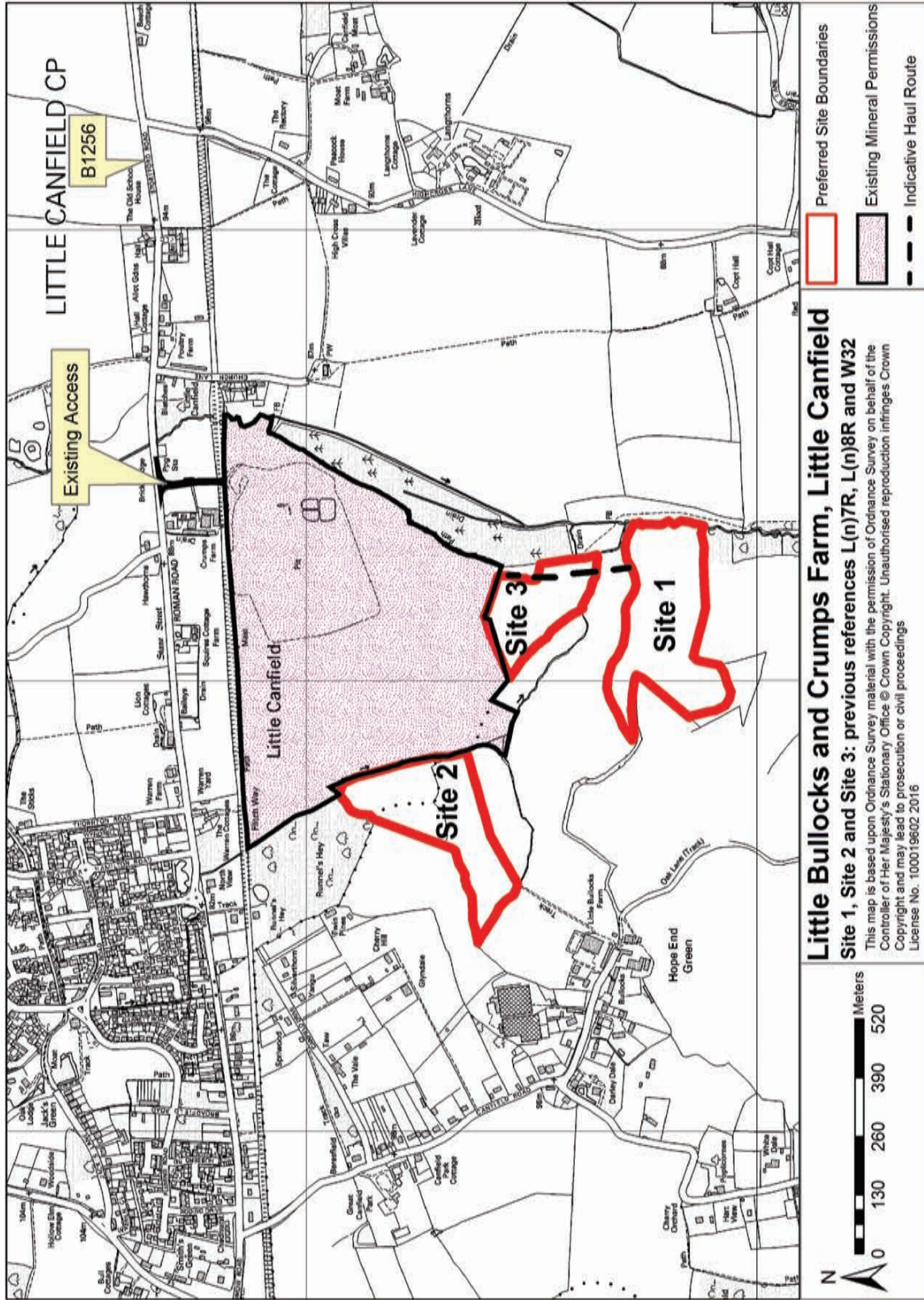
- A vehicle **routing routing** agreement is required to ensure the site would be accessed via the existing access for Crumps Farm onto Stortford Road (B1256) to travel via the A120/M11. An internal haul road would be required between the site and the Crumps Farm access.
- Dust mitigation measures, limits on duration (hours of operation) and noise standards (from noise sensitive properties) will be established in the interests of protecting local amenity.

The following specific issues and opportunities are to be addressed for Site 1:

- The eastern end of the site lies in a small secluded valley with a small river and nearby woodland. Advanced planting should screen views of the area from this direction, including views from the PRoW Lt Canfield 19.
- The river and Local Wildlife Site (LoWS) require protection for example through an appropriate buffer of at least 15m and through the assessment of potential hydrological impacts with appropriate protection. Existing vegetation to the south of the site should be protected and retained.
- Those areas of archaeological deposits preserved in-situ from the extraction phase shall be included as part of any restoration scheme.
- The impacts from the proposal need to be addressed on the designated buildings located in the vicinity - especially on the setting of the Church of All Saints.

- The site layout should ensure a sequential approach is adopted whereby areas of greater vulnerability, such as buildings and stockpiles are located in Flood Zone 1.
  - Careful consideration must be given to the final restoration contours to ensure the final landform blends with the surrounding topography and the restoration would be predominantly back to agricultural use given the presence of Grade 2 agricultural soil.
- The following specific issues and opportunities are to be addressed for Site 2:
- ~~Waste shall be restricted to stable non-reactive hazardous waste. No liquids, slurries, sludges, clinical wastes or oils shall be deposited on site.~~
  - Residential property off Canfield Drive with views of the site should be protected by appropriate bunding/screening. Gaps in hedging on the boundary should be addressed to screen views.
  - The site is adjacent to a Local Wildlife Site (UFD 172 – Runnels Hey), and area of Ancient Woodland. This site must be protected for example, through an appropriate buffer.
  - To demonstrate that there would not be an adverse effect on a European site through HRA. **Any development would need to ensure that there would not be an adverse impact on water quality. Most likely potential impacts to consider would be caused by water pollution.**
  - A hydrological assessment should be undertaken.
  - Those areas of archaeological deposits preserved in-situ from the extraction phase shall be included as part of any restoration scheme.
  - The impacts from the proposal need to be addressed on the designated buildings located in the vicinity - especially on the setting of Church of All Saints.
  - PRoW footpaths Great Canfield 2 and Little Canfield 8 cross the site and would require temporary diversion during operations.
  - Careful consideration must be given to the final restoration contours to ensure the final landform blends with the surrounding topography and the restoration would be predominantly back to agricultural use given the presence of Grade 2 agricultural.
- The following specific issues and opportunities are to be addressed for Site 3:
- An archaeological evaluation should be undertaken to assess the area for surviving archaeological deposits. This should comprise a programme of trial trenching covering the total area of development. If deposits are identified then an appropriate mitigation strategy for preservation in situ or preservation by excavation should be submitted.
  - Any proposal shall include planting to screen development on south and east boundaries of the site.

Map 11 L(n)7R and L(n)8R - Little Bullocks Farm and W32 - Crumps Farm, Great and Little Canfield



## Appendix 15 - Table 14 Morses Lane, Brightlingsea

Table 14 Morses Lane, Brightlingsea

District	Tendring
Area	1.82ha
Indicative Facility Scale	75,000tpa
Link to Waste and Mineral Activities	N/A
Site Allocation For	Inert Waste Recycling Capacity
Access	Morses Lane
Estimated Availability	Immediately
Life	Permanent

This undeveloped site on the edge of an urban area adjoins an existing waste operation. The following specific issues and opportunities are to be addressed:

- To demonstrate that it could not have an adverse effect on European sites through HRA. Most likely potential impacts would be by exhaust emissions (from the road into Brightlingsea) and disturbance to birds.
- Site should be screened by planting on the north, south and west sides of the site to mitigate visual and landscape effects.
- A trial trenching evaluation should be undertaken to assess the area for surviving archaeological deposits. If deposits are identified then an appropriate mitigation strategy should be submitted.
- **It is expected that operations would be enclosed within an appropriate building.** Dust mitigation measures, limits on duration (hours of operation) and noise standards (from noise sensitive properties) will be established in the interests of protecting local amenity.
- **The configuration and operation of the proposed facility shall have regard to impacts on neighbouring land uses, including the potential impacts on the adjacent retail use.**

## Appendix 16 - Table 15 Newport Quarry

Table 15 Newport Quarry

District	Uttlesford
Area	8.4ha
Indicative Facility Scale	15,000tpa - Inert Waste Recycling Capacity 300,000m <sup>3</sup> - Inert Landfill Capacity
Link to Waste and Minerals Activities	ESS/17/12/UTT granted planning permission for chalk extraction
Site Allocation For	Inert Landfill Capacity Inert Waste Recycling Capacity
Access	Via Unnamed Road to B1383 London Road
Estimated Availability	Up to 5 years
Life	Until 2042

This site is within an existing quarry. The following specific issues and opportunities are to be addressed:

- The site should continue to be restored to **lowland** calcareous grassland, with areas also retained to demonstrate its geological importance.
- **Areas already restored should not undergo any further development except to ensure that the chalk grassland develops into Priority Habitat Lowland Calcareous Grassland and/or Open Mosaic Habitat, improve any other existing biodiversity and to retain the sand piles. Careful consideration of the environmental and visual impacts of the waste development will be necessary as**

**part of a planning application, particularly if a proposal relates to already restored areas. Specifically, ecological enhancement of the site would be sought, with the final restoration and long-term aftercare expected to result in the creation of lowland calcareous grassland priority habitat. It will be necessary to consider phased working to avoid the loss of existing species.**

- Retain existing trees and hedges to screen views of site. Consider new planting to screen views into site.
- No development should occur outside the quarried areas as this will have the potential to impact important archaeological deposits.
- Dust mitigation measures, limits on duration (hours of operation) and noise standards (from noise sensitive properties) will be established in the interests of protecting local amenity.
- A vehicle **routing** agreement is required to ensure the site would be accessed via the existing access to Newport Quarry and via the Main Road Network **(B1383). The number of heavy vehicle movements to and from the east shall be limited to those serving Widdington only.**
- Consideration would need to be given at the planning application stage to the safe operation of the road bridge over the railway line west of the site access and the requirement for any additional traffic management.

## Appendix 17 - Table 19 Sunnymead, Elmstead and Heath Farms

Table 19 Sunnymead, Elmstead & Heath Farms

District	Tendring
Area	<b><u>Site 1:</u></b> 63.74ha <b><u>Site 2:</u></b> <b><u>7ha</u></b>
Indicative Facility Scale	<b><u>Site 1:</u></b> 1,800,000m <sup>3</sup> <b><u>Site 2:</u></b> <b><u>40,000tpa</u></b>
Link to Waste and Minerals Activities	Site is allocated for extraction within the MLP 2014 (site A20)
Site Allocation For	<b><u>Site 1:</u></b> Inert Landfill Capacity <b><u>Site 2:</u></b> <b><u>Inert Waste Recycling</u></b>
Access	Current Haul road extended in from currently operational processing area where the existing access of Keelers Tye & B1027 will be used
Estimated Availability	2018
Life	<del>8</del> -17 years

The following specific issues and opportunities are to be addressed:

- The site would be an extension to the existing Wivenhoe Quarry, linked by a haul route to the existing processing plant and utilising the existing highway access onto the B1027.
- Improvements required to visibility at the junction of the private access and Keelers Tye.



- Restoration provides the opportunity for significant biodiversity enhancement and habitat creation on site. In-filling and restoration should be in line with habitat creation and outcomes sought in the Minerals Local Plan and any associated documents.
- To demonstrate that it could not have an adverse effect on European sites through HRA. Most likely potential impacts would be caused by disturbance.
- **Those areas of archaeological deposits preserved in-situ from the extraction phase shall be included as part of any restoration scheme.**
- **An archaeological desk based assessment would be required to investigate the gravels to establish their potential for Palaeolithic remains and trial trench evaluation will be required, along with a mitigation strategy, to form part of the Environmental Statement.**
- The infilling must return the site to original ground levels and to agricultural use. Woodland planting of an appropriate species/character, scale etc must be considered to ensure compatibility with adjacent Ancient Woodland.
- PRoW footpath Elmstead 24 crosses **the site 1 and is adjacent to site 2**, and requires sufficient stand-off distance and protection during operations (e.g., satisfactory crossing point(s) provided for quarry vehicles).
- Dust mitigation measures, limits on duration (hours of operation) and noise standards (from noise sensitive properties) will be established in the interests of protecting local amenity.
- Careful consideration must be given to the final restoration contours used to ensure the final landform blends with the surrounding topography and to ensure Grade 2 agricultural soils are retained on site.

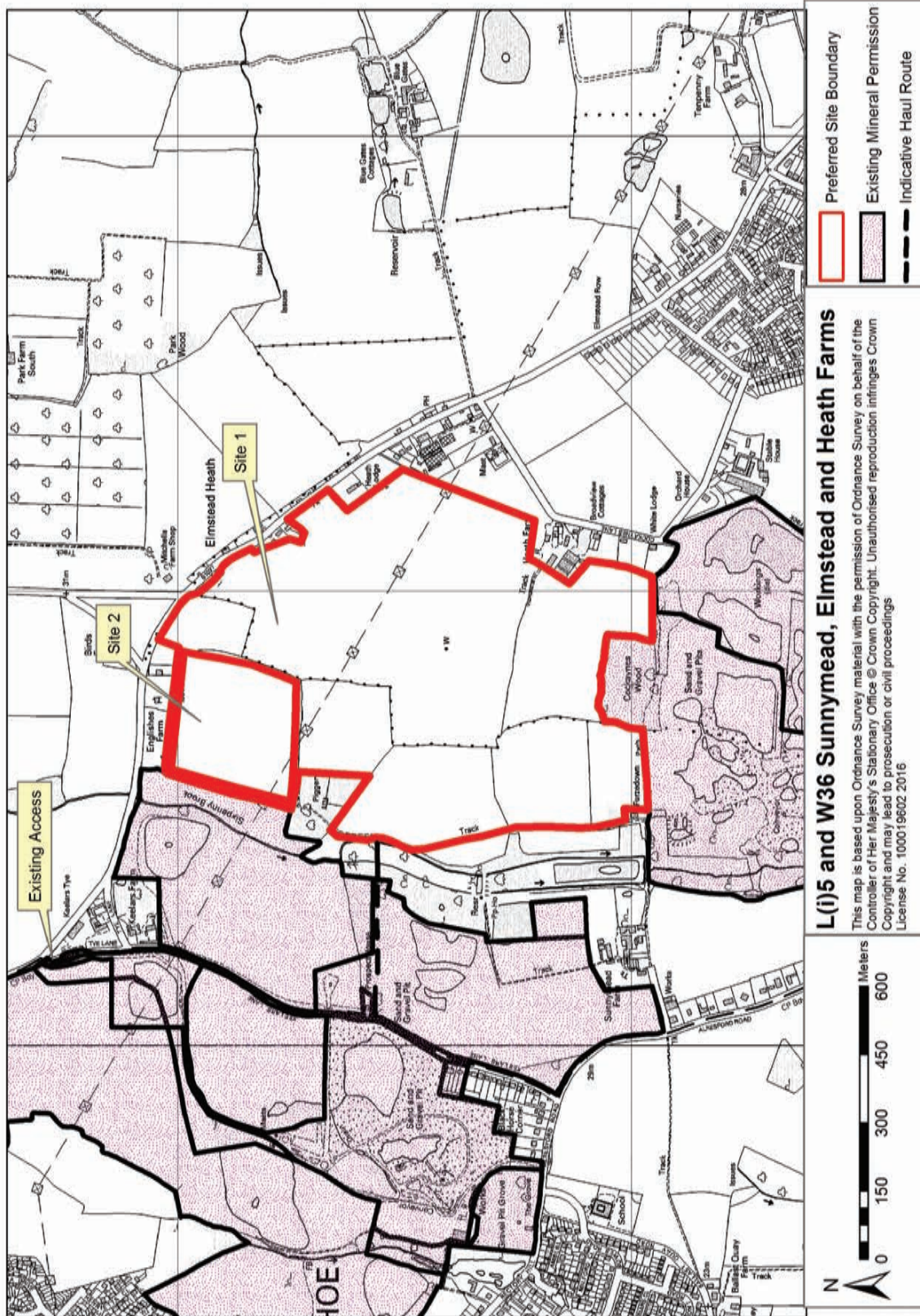
**The following specific issues and opportunities are to be addressed for Site 1:**

- **A minimum of 100m standoff should be provided for all residential properties and effective screening provided to screen views of the site.**
- Cockaynes Wood Local Wildlife Site adjoins the southern boundary and would require protection during operations.
- Footpaths Elmstead 19 and Alresford 2 also run along the southern boundary and through Cockaynes Wood and need protection during operations. The ability to reinstate these fully needs to be investigated as part of the suggested restoration scheme.

**The following specific issues and opportunities are to be addressed for Site 2:**

- **Bunding is required on north, east and south sides to screen the site.**
- **To demonstrate that it could not have an adverse effect on European sites through HRA. Most likely potential impacts would be caused by disturbance.**

Map 19 L(i)5 and W36 Sunnymead, Elmstead and Heath Farms



## Appendix 18 - Table xx Dollymans Farm

Table xx Dollymans Farm <sup>(5)</sup>

<u>District</u>	<u>Basilidon/Rochford</u>
<u>Area</u>	<u>16.09ha</u>
<u>Indicative Facility Scale</u>	<u>500,000 tonnes</u>
<u>Link to Waste and Mineral Activities</u>	<u>The site constitutes a former mineral borrow pit.</u>
<u>Site Allocation For</u>	<u>Inert Landfill Capacity</u>
<u>Access</u>	<u>Via private road adjoining A130</u>
<u>Estimated Availability</u>	<u>2017</u>
<u>Life</u>	<u>Up to 5 years</u>

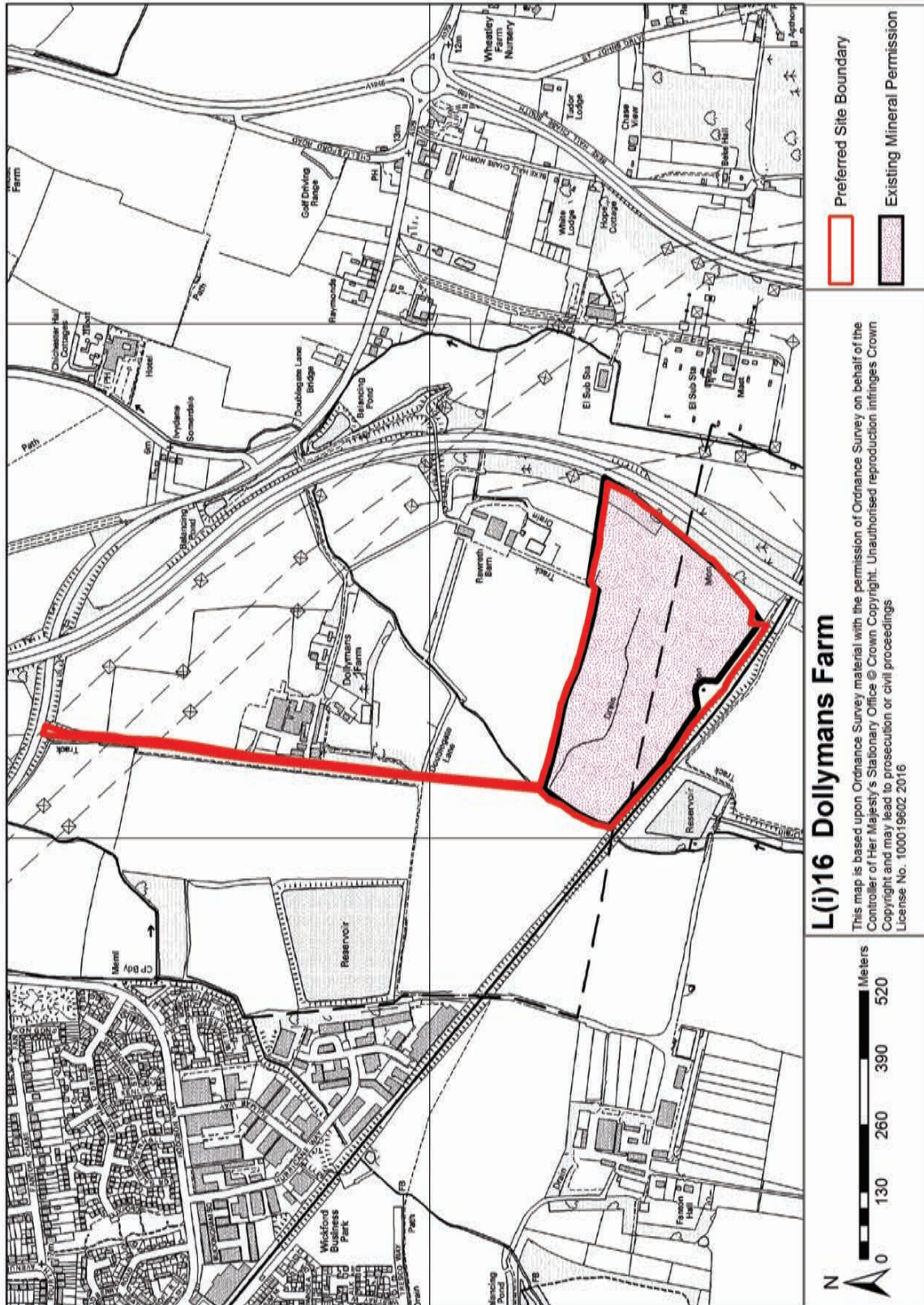
This site would culminate in the restoration of a former mineral void. The following specific issues and opportunities are to be addressed:

- All access should be via the A129. A Transport Assessment would be required at the planning application stage to review access arrangements and examine safety and capacity of the local road network. This may result in the diversion of bridleway to segregate users from vehicles or other mitigation works.
- Restoration of the site through this allocation provides the opportunity for biodiversity, landscape and visual enhancement. Careful consideration of the environmental impacts of the waste development will be necessary as part of a planning application with proportionate levels of mitigation to be established. Specifically, the WPA would seek the overall landscape improvement of the site, with the final restoration and long-term aftercare to be beneficial to the Green Belt and biodiversity.
- Retain trees and shrubs to screen plant and materials from the road. Consider new planting and bunding to screen views into the site.

5 Table and Map numbering to be confirmed upon adoption.

- Dust mitigation measures, limits on duration (hours of operation) and noise standards (from noise sensitive properties) will be established in the interests of protecting local amenity.
- An Archaeological Desk Based Assessment should be carried out to identify the extent of preservation within the northern part of the site and preservation requirements around war memorials.
- Areas of archaeological deposits preserved in situ will require excavation if working is likely to cause ground disturbance in the north western part of the site
- A management proposal for the survival and maintenance of the memorial for the burial sites should be submitted with any application.

Map xx L(i)16 Dollymans Farm



## Appendix 19 - Table 21 Development in Waste Consultation Area

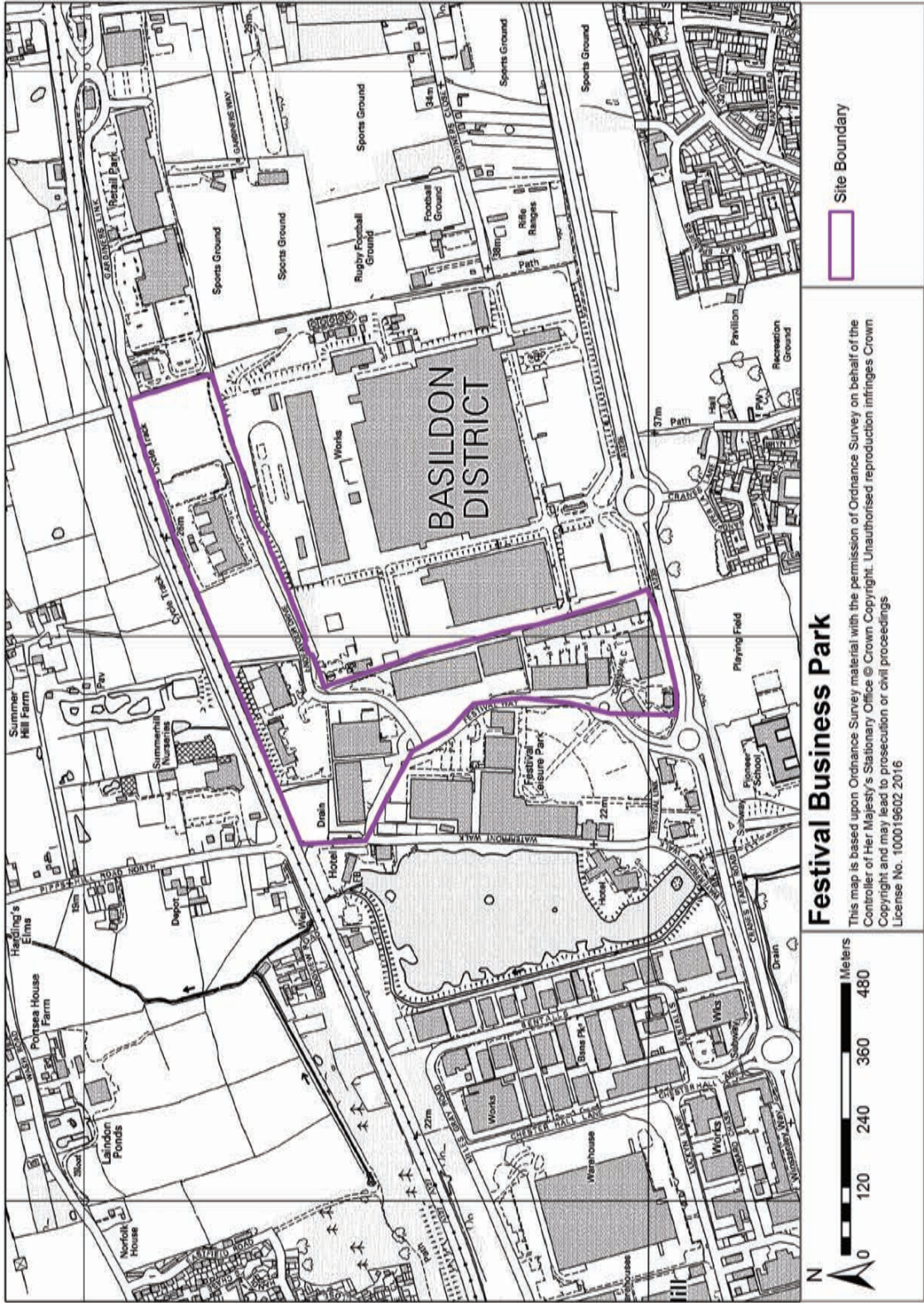
Table 21 Development in Waste Consultation Area

Nature of Development	Included or Excluded from consultation with the Waste Planning Authority
Applications for development on land, which is already allocated in adopted local development plan documents.	Included
Proposals for minor infilling of development within the defined settlement limits for towns, villages and hamlets identified in adopted local development plan documents.	Included
<p>Applications for householder development including:</p> <ul style="list-style-type: none"> <li>• Construction of a replacement dwelling where the new dwelling occupies the same or similar footprint to the building being replaced;</li> <li>• Minor extensions to existing dwellings or properties where they lie within the immediate curtilage and would not bring the building within 250m of the boundary of an existing strategic facility or preferred site allocation;</li> <li>• Proposals for the provision of incidental and non-habitable structures lying within the curtilage of an existing dwelling (such as driveways, garages, car parks and hard standing).</li> </ul>	Excluded
Proposals for the erection of agricultural buildings immediately adjacent to an existing working farmstead.	Excluded
<p>Applications <b>for change of use:</b></p> <ul style="list-style-type: none"> <li>• <b><u>From B2/B8 to any other use</u></b></li> <li>• <b><u>To Class A and C, from any other use</u></b></li> </ul>	Included
<b><u>Other applications for change of use.</u></b>	<b>Excluded</b>
<b><u>Applications for temporary buildings, structures or uses (for up to five years):</u></b>	<b>Included</b>
Applications related to existing permissions such as for reserved matters, or for minor amendments to current permissions.	Excluded

Nature of Development	Included or Excluded from consultation with the Waste Planning Authority
Applications for other kinds of consent – advertisements; listed building consent; Conservation Area consent and proposals for work to trees or removal of hedgerows.	Excluded
Proposals for the demolition of a residential or other building.	Excluded
Proposals for minor works such as fencing or bus shelters.	Excluded
Proposal for any extension of and/or change to the curtilage of property.	Included
Proposals for B2 and B8 development on land allocated for such uses.	Excluded

# Appendix 20 - Festival Business Park, Basildon

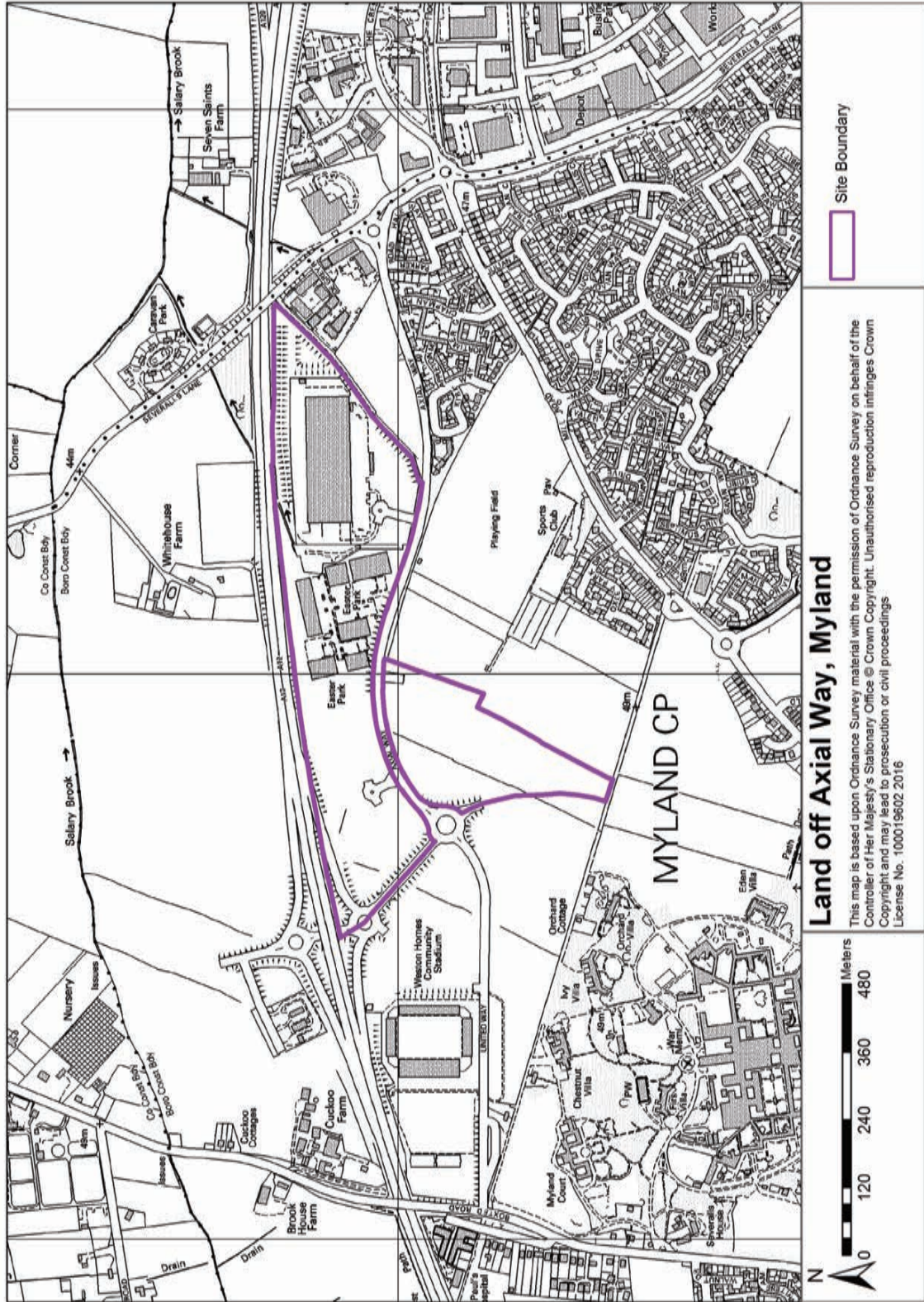
Map 22 Festival Business Park





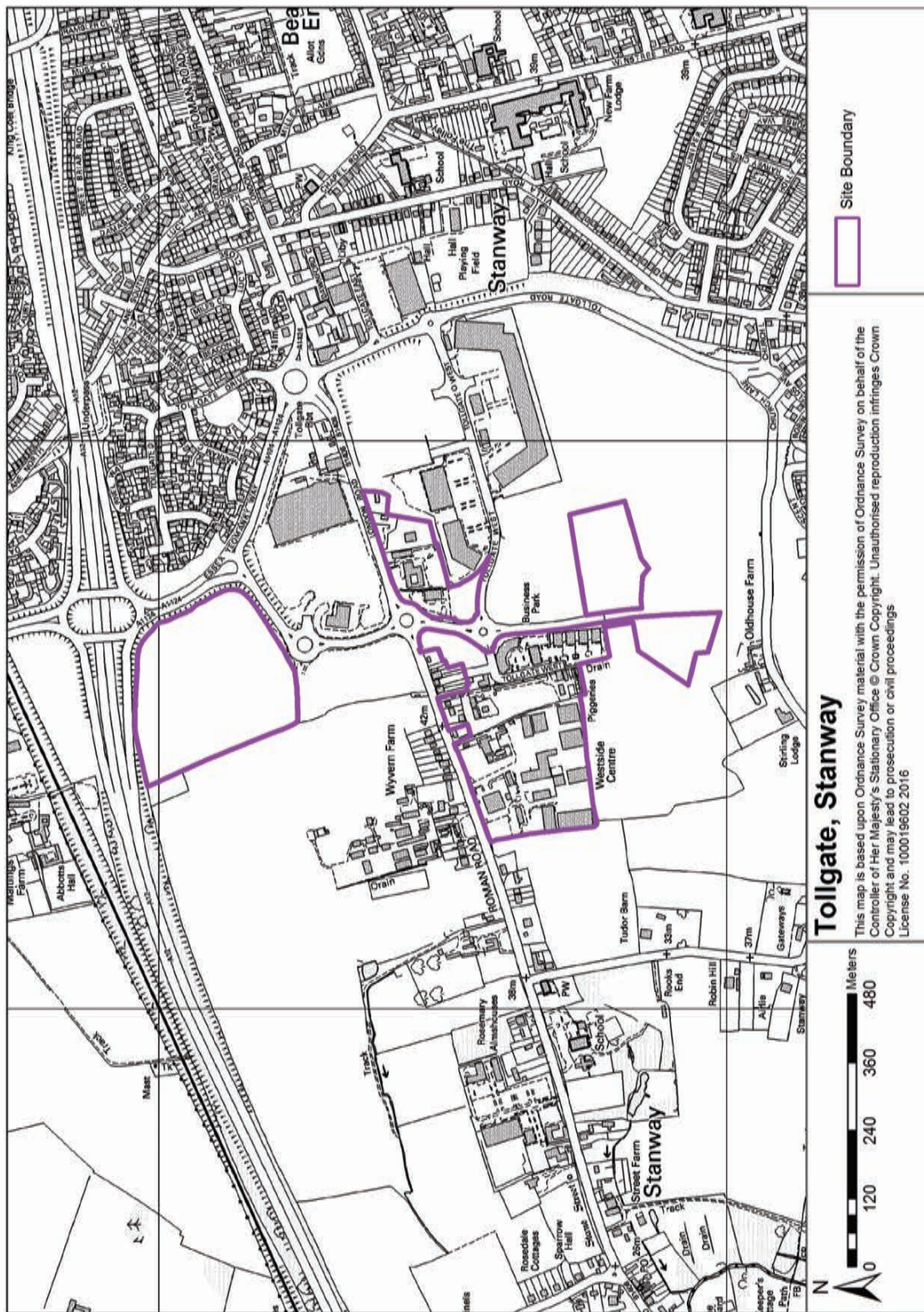
# Appendix 21 - Land off Axial Way, Colchester

Map 39 Land off Axial Way, Colchester



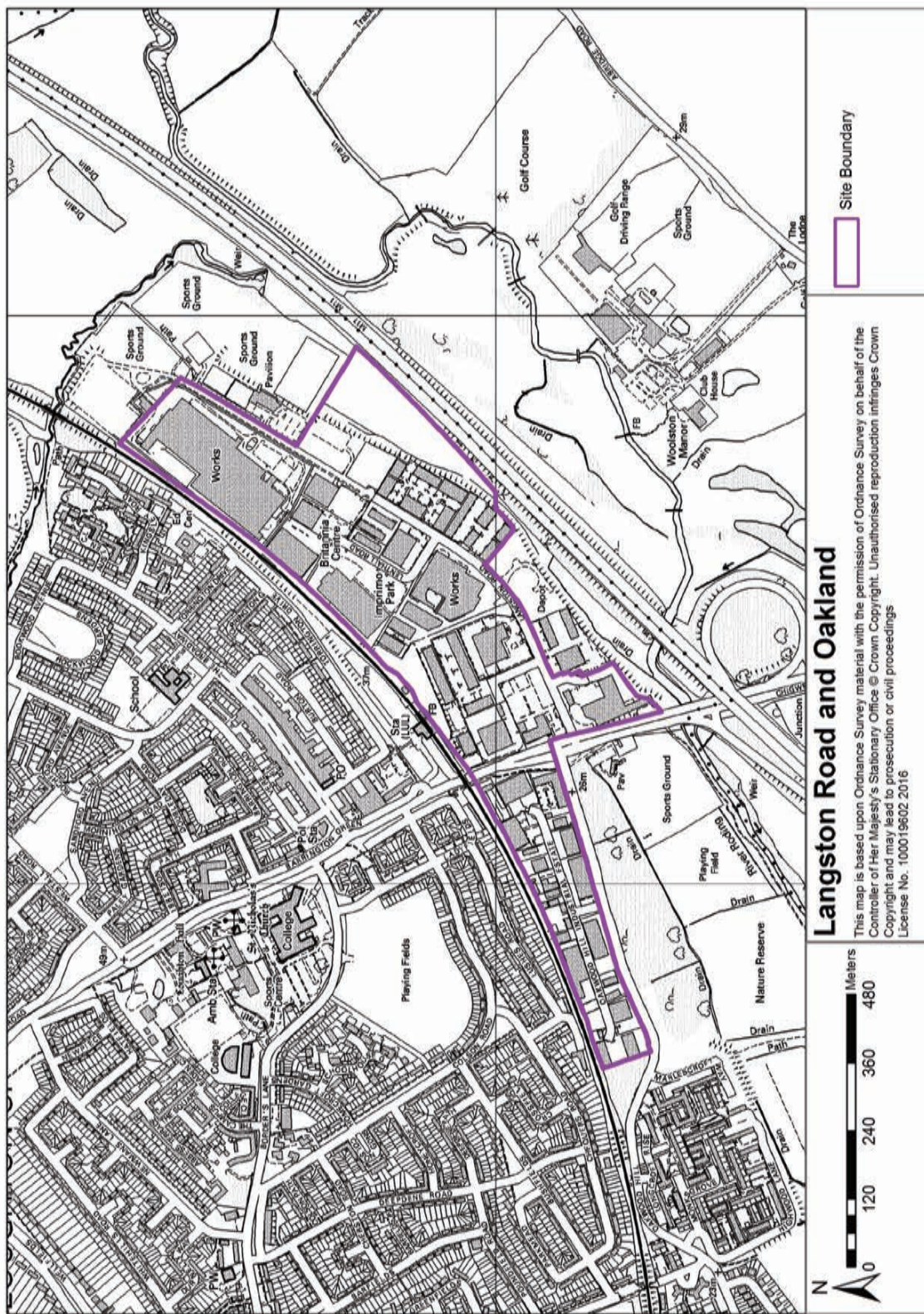
# Appendix 22 - Tollgate, Stanway, Colchester

Map 41 Tollgate, Stanway



# Appendix 23 - Langston Road/Oakwood Hill, Loughton, Epping Forest

Map 43 Langston Road/Oakwood Hill, Loughton, Epping Forest







This information is issued by:  
**Essex County Council**  
**Minerals and Waste Planning as part of the**  
**Minerals and Waste Development Framework**

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The information contained in  
this document can be translated,  
and/or made available in alternative  
formats, on request.

Published January 2017.

## Appendix 4 - Further Minor Modifications

Minor Modification reference	Section of the draft Plan	Minor Modification as subject to consultation in January 2017	Further Minor Modification recommended
MIN30	Paragraph 4.24	Bradwell Nuclear Power Station is a licensed Nuclear Site and is the principal source of radioactive arisings within the Plan area whilst the Power station is decommissioned. At present there is sufficient <u>national LLW disposal capacity and sufficient local ILW interim storage</u> capacity for this decommissioning process	<p><i>As additional text under para 4.24:</i></p> <p><u>The Government is pursuing its strategy for a long term national Geological Disposal Facility (GDF) for higher activity radioactive waste which is scheduled to be operational by 2040. Any proposed GDF facility would be approved as a Nationally Significant Infrastructure Project (NSIP) under the Planning Act 2008.</u></p> <p><u>The national strategy for the management of radioactive waste is prepared and issued by the Nuclear Decommissioning Authority. The Energy Act 2004 requires that the NDA Strategy is reviewed and republished at least every five years. UK Government and the Scottish Ministers approved the current Strategy, "NDA Strategy III" in March 2016 and it came into effect in April 2016. The Local Plan seeks to be consistent with prevailing NDA Strategy and recognises its status as a national policy in the arena of radioactive waste management.</u></p>
MIN39	Paragraph 8.23	8.23 <u>The Bradwell-on-Sea site is one of the first UK nuclear reactor sites to be decommissioned. Within the period covered by this policy document, the site will enter into an extended period of care and maintenance prior to which the site will be secured as appropriate, and packaged ILW</u>	The Bradwell-on-Sea site is one of the first UK nuclear Magnox reactor sites to be decommissioned. Within the period covered by this policy document, the site will enter into a period of quiescence, termed care and maintenance. Prior to this, ILW will be packaged and placed within the dedicated on-site storage facility. The packaged ILW will remain in the

Minor Modification reference	Section of the draft Plan	Minor Modification as subject to consultation in January 2017	Further Minor Modification recommended
		<p><u>placed in storage within the dedicated on-site interim ILW Storage facility. The packaged ILW will remain in the store until a national Geological Disposal Facility (GDF) is available to receive the packages. This process is in accordance with DECC's UK's waste management strategy for LLW &amp; ILW (dated 2010). Following the extended period of care and maintenance, the site will be decommissioned and remediation activities undertaken which when completed will allow the site to reach end state and enable the next planned use.</u></p>	<p>store until a national Geological Disposal Facility (GDF) is available. This process is in accordance with DECCs UKs waste management strategy for LLW &amp; ILW (dated 2010), <u>the UK Strategy for the Management of Solid Low Level Waste from the Nuclear Industry, published in February 2016, as well as the Nuclear Decommissioning Authority Strategy April 2016 ("NDA Strategy III")</u>. <u>These strategies are subject to continual review.</u> Following the extended period of care and maintenance, the site will be decommissioned and remediation activities undertaken (<u>which may include in-situ disposal</u>) which when completed will allow the site to reach end state and enable the next planned use.</p>



# Essex and Southend-on-Sea Replacement Waste Local Plan

## **Modifications Consultation: Schedule of all representations**

March 2017

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## Introduction

This document sets out representations received during the modifications consultation period on the Replacement Waste Local Plan. Consultation took place between 5 January and 16 February 2017 with representations relating to:

- MC1 Schedule of Modifications
- MC2 Site Assessment and Methodology Addendum
- MC3 Sustainability Appraisal Addendum

Copies of all documentation were available online via [www.essex.gov.uk/WLP](http://www.essex.gov.uk/WLP) and [www.southend.gov.uk/wastelocalplan](http://www.southend.gov.uk/wastelocalplan). Paper copies of the Schedule of Modifications were available at County Hall in Chelmsford, at the Civic Centre in Southend and at Essex and Southend libraries and district/borough/city council offices.

In total 372 consultees submitted 553 responses.

All representations received are set out in this report in Plan order.

Representations relating to site allocations are at the end of the report and displayed in the order shown in Policy 3 of the RWLP

Appendix 1 of this document contains all attachments submitted alongside representations, including maps and other information.

This document was submitted to the Inspector on Monday 20 March 2017.

## Main Modifications

### Modification M1 – ‘Waste Challenge at a Glance’

Person ID, Organisation, Comment ID	Do you agree with proposed modification M1?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
985065, 44	No	<p>As things stand this specifically allocates Rivenhall (as the only relevant consented plant in the plan area) to take imported London waste for incineration but without any clear justification. At present, the waste disposal authority is considering long term management options for the stabilised residual waste output of the Tovi Eco Park facility. In 2016, the annual 200,000 t output from this facility was exported from the plan area. (Deleted - a competitive tender process will identify the long-term management solution for this waste, which could include continued exportation from the plan area). In line with the plans strategy for the plan area to become net self-sufficient with regard to its waste management needs where practicable, the plan includes a site allocation which has capacity to potentially manage this residual waste in the plan area in the longer term. Same comments as for mods 3 and 5. In addition, why was the reference to a competitive tender process deleted? The original wording is legally compliant, whereas the allocation of Rivenhall to take ECC owned material is legally questionable.</p>	
1057927, Hayleys Padfield Ltd, 63	No	<p>It is noted in Appendix A that the Plan now identifies a shortfall of some 7.05mt of inert waste capacity which will need to be managed over the plan period. This is an increase of some 4.47mt over that originally identified in the Local Plan submitted for examination in public. We welcome the up-to-date figures as they provide a far more accurate picture of the inert waste</p>	<p>In order to ensure that that the statement since no other submitted sites have been deemed suitable for the management of inert waste in the Plan area is correct and the Plan is sound sound/legally compliant, Green Belt sites need to be reassessed</p>

Person ID, Organisation, Comment ID	Do you agree with proposed modification M1?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>capacity required for the plan period. It has however, as set out above, resulted in a significant increase in unmet capacity which isn't being provided for through site allocations. Appendix 1 however suggests that no other submitted sites have been deemed suitable for the management of inert waste. In our view this statement is incorrect. The inspector recommended a number of modifications which were deemed necessary to make the plan sound/legally compliant and appropriate for adoption. One such recommendation was that discounting a site purely on the grounds that it is situated in the Green Belt renders the plan unsound. The inspectors recommendations in relation to Dollymans Farm and its subsequent allocation in our view, is a clear steer that other sites discounted purely because of their location in the Green Belt should also be reconsidered. As set out within paragraph 6 of the NPPW, local authorities should work collaboratively with local planning authorities and first look for suitable sites and areas outside the Green Belt for waste management facilities that, if located in the Green Belt, would be inappropriate development. There is now an identified need for 7.05mt of inert waste capacity over the plan period and Essex County Council has not identified enough sites for inert waste disposal to meet the calculated demand over the plan period, with an increased shortfall of 4.47mt. Therefore in accordance with paragraph 6 of the NPPW and paragraph 83 of the NPPF, sites within the Green Belt should be considered to meet the shortfall in need. The methodology of Site Assessment and Selection Report states that stage 2 introduces a sequential approach whereby sites that are in the green belt or score red for traffic and transportation are held back (unless there are</p>	<p>for allocation.</p>

Person ID, Organisation, Comment ID	Do you agree with proposed modification M1?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>exceptional circumstances). Rather than being excluded completely such as at Stage 1, sites in the green belt or that do not comply with transport policy would only be considered for allocation if, after the rest of the assessment had been carried out through Stage 3, insufficient sites that passed Stage 2 were suitable for meeting the capacity gap associated with a particular waste stream. . Despite this statement which is in line with the NPPF and NPPW guidance set out above, the increase in shortfall and the inspectors observations, Essex County Council continues to take a blanket approach to rejecting all landfill/inert waste disposal sites within the Green Belt, regardless of other sustainability factors, with only Dollymans Farm being allocated in response to concerns raised by the inspector in relation to that specific site. Furthermore the blanket approach has resulted in a lack of waste facilities and in particular inert waste recycling facilities in the south of the County. As a result the plan is not in accordance with the three dimensions of sustainable development, namely economic, social and environmental. In particular it will result in long journeys within and out of the County to dispose of waste. Especially given that it is the southern part of the county which is the most populated. As a result there is a strong and over reliance on inert waste sites in the North of Essex and a long distance in sustainability terms from Harlow, which does not accord with the Spatial Strategy. The Spatial Strategy specifically sets out that new waste developments should principally be directed to key urban centres including Harlow. An example of a site which should be reconsidered to ensure that the statement since no other submitted sites have been deemed suitable for the management</p>	



Person ID, Organisation, Comment ID	Do you agree with proposed modification M1?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>of inert waste in the Plan area is correct and the Plan is sound plan sound/legally compliant is Hastingwood, Harlow (W19). This 1.35 hectare Green Belt site was submitted by the landowner for consideration for either inert or non-inert waste recycling. The extent of the site proposed resulted from discussions with Essex County Council and is currently made up of 0.96 hectares of previously developed land and 0.39 hectares of agricultural land. At the time of submission the majority of the site had been used for many years for the storing, sorting and recycling of aggregates, albeit without the benefit of planning permission. Since that time the landowner has successfully acquired a Certificate of Lawful Use for the site to be used for the storage, screening and distribution of recycled of road planning (and use of associated plant and equipment) (LPA Ref: ESS/39/EPF). The majority of the site can therefore now be described as previously developed land which in our view is now a material consideration in favour of its allocation. The site was discounted on the grounds that it was situated in the Green Belt. However, it scored very well in the sustainability appraisal with benefits of allocating the site including its location is a very sustainable location in close proximity to Harlow which is an area of the County that does not have any inert waste disposal facilities; t location next to Junction 7 of the M11, a major transport corridor; the significant distance of the site from residential properties; and the low quality nature of the Green belt land particularly given that over 2/3 of its previously developed land.</p>	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M1?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
1060507, Coggeshall Neighbourhood Plan Committee, 86	No	<p>Currently Rivenhall is allocated as the only consented plant in the plan area to take waste imported from London. However it fails to state any clear justification. At present, the waste disposal authority is considering long term management options for the stabilised residual waste output of the Tovi Eco Park facility. In 2016, the annual 200,000 t output from this facility was exported from the plan area. (Deleted - a competitive tender process will identify the long-term management solution for this waste, which could include continued exportation from the plan area). In line with the plans strategy for the plan area to become net self-sufficient with regard to its waste management needs where practicable, the plan includes a site allocation which has capacity to potentially manage this residual waste in the plan area in the longer term. Please see comments above for mods 3 &amp; 5. It is also noted that the reference to a competitive tender process was deleted? Why was this? The original wording is legally compliant, whereas the allocation of Rivenhall to take ECC owned material is legally questionable.</p>	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M1?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
477311, , 95	No	<p>Appendix 1 para 4.21 introduces post 2026 importation of residues from London to be incinerated in the Plan area for energy recovery at consented plant. As things stand this specifically allocates Rivenhall (as the only relevant consented plant in the plan area) to take imported London waste for incineration but without any clear justification. This raises questions over additional HGV movements to and from the plant. At present, the Waste Disposal Authority is considering long term management options for the stabilised residual waste output of the Tovi Eco Park Facility. In 2016, the annual 200,000 t output from this facility was exported from the Plan area. (Deleted - A competitive tender process will identify the long-term management solution for this waste, which could include continued exportation from the Plan area). In line with the Plans Strategy for the Plan area to become net self-sufficient with regard to its waste management needs where practicable, the Plan includes a site allocation which has capacity to potentially manage this residual waste in the Plan area in the longer term. It does not provide clarity. The plan should make it clear that this material (originally called other waste) is 200,000 tonnes per annum (tpa) SRF/RDF because the allocation is a specifically known output from the operational Basildon plant to be trucked to the proposed (but not built) Rivenhall site. It is not clear that this is legally compliant. ECC is proposing to allocate the proposed (but not built) private site at Rivenhall to take the known SRF/RDF output from the Basildon plant. This output is legally owned by ECC as stated in the operational contract for the Basildon plant. Therefore ECC appears to be confusing planning and procurement by allocating</p>	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M1?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>material it legally owns to a specific site. ECC is aware that gent Fairhead, the applicant for the Rivenhall site has specifically stated in planning documents submitted to ECC that Rivenhall is the site to which the Basildon specific output can be sent. The plan should be amended to ensure that there is no single allocation made for this specific material owned by ECC. It is waste material that should by law be subject to an open procurement process. Essex county council has stated that it delayed its final procurement process for SRF/RDF from Basildon for a few years to allow further sites to come on-stream but has nevertheless allocated Rivenhall to take the SRF/RDF from Basildon ahead of that procurement process knowing that only Rivenhall in the plan area could be used in the stated time horizon. However even that assumption should now be questioned given that the environment agency refused the permit application for the Rivenhall site in December 2016 because of the failure to demonstrate bat (best available technology). ECC is therefore attempting to allocate a plant that has not been built (and is still going through planning) and has no licence, for a potential contract to take waste material it owns. In addition, map 5 fails to allocate Rivenhall for residual non-hazardous waste management (previously "other waste ") as ECC states it wishes to do. In addition, why was the reference to a competitive tender process deleted? The original wording is legally compliant, whereas the allocation of Rivenhall to take ECC owned material is legally questionable.</p>	
1053830, , 104	No	Appendix 1 para 4.21'...competitive tender processes should not	Appendix 1 para 4.21 Leave text unchanged or

Person ID, Organisation, Comment ID	Do you agree with proposed modification M1?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		be removed. This is required to be legal. Why remove.	modify to be legally compliant.
735401, Basildon Borough Council, 128	No	Object to principle of M23 (see M23 for reasoning), which is cross referenced in M1, but if it Inspector is minded to approve M23; the Council accepts that the figures would need to change.	
1061659, , 182	No	As things stand this specifically allocates Rivenhall (as the only relevant consented plant in the plan area) to take imported London waste for incineration but without any clear justification. At present, the waste disposal authority is considering long term management options for the stabilised residual waste output of the Tovi Eco park facility. In 2016, the annual 200,000 t output from this facility was exported from the plan area. (Deleted - a competitive tender process will identify the long-term management solution for this waste, which could include continued exportation from the plan area). In line with the plans strategy for the plan area to become net self-sufficient with regard to its waste management needs where practicable, the plan includes a site allocation which has capacity to potentially manage this residual waste in the plan area in the longer term. Same comments as for mods 3 and 5. In addition, why was the reference to a competitive tender process deleted? The original wording is legally compliant, whereas the allocation of Rivenhall to take ECC owned material is legally questionable.	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M1?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
1061682, , 199	No	<p>At the moment this point specifically allocates Rivenhall as the only relevant and consented plant in this area, to take imported London waste for incineration but without justification. At present, the Waste Disposal Authority is considering long term management options for the stabilised residual waste output of the Tovi Eco Park Facility. In 2016, the annual 200,000 t output from this facility was exported from the Plan area. (Deleted - A competitive tender process will identify the long-term management solution for this waste, which could include continued exportation from the Plan area). In line with the Plans Strategy for the Plan area to become net self-sufficient with regard to its waste management needs where practicable, the Plan includes a site allocation which has capacity to potentially manage this residual waste in the Plan area in the longer term. The reference to a competitive tender process was deleted? Why? This would therefore question that the allocation of Rivenhall to take ECC owned waste is legal. This does not clearly define what exactly "other waste" actually is. It should be made clear that the 200,000 tonnes of waste per year will be SRF/RDF as this has been allocated from the Basildon plant to be driven down to the Rivenhall site. This site has and may not still be built and is adds additional pollution. It is still unclear if this is even legally allowed. Essex County Council are proposing to allocate the Rivenhall site which as stated above has not even been built or received a permit, to take the SRF/RDF waste from Basildon which coincidentally is owned by ECC as was stated in the operational contract for the plant. It would therefore appear that ECC are allocating their own waste to a specific site. ECC are also aware that the applicant for the site at Rivenhall, Gent</p>	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M1?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>Fairhead has stated in their planning documentation that the site at Rivenhall will take the output from the Basildon site. This is not only confusing the planning and procurement by doing this; it is also a conflict of interests I feel. This should therefore be amended so that the waste material should go through an open procurement process and not all be pushed towards an already environmentally unsound plant. Just to boost their figures. ECC had delayed the procurement process for SRF/RDF from Basildon to allow further sites to come forward, yet have still allocated Rivenhall to take all the waste knowing that this site would be the only one able to take the waste in the time frame. In view of the recent environmental agency permit refusal and the sites failure to demonstrate BAT, their assumption should be questioned as the plant has not been built and has not licence in which to enable a contract between the companies to take the waste.</p>	
1061711, Goslings Granary, 206	No	<p>The following deleted words should be reinstated: - "A competitive tender process will identify the long term management solution for this waste, which could include continued exportation from the Plan area." The justification for the above wording being reinstated is in order to make the Plan legally compliant. The future treatment/disposal of the stabilised residual output from the Tovi Eco Park Facility at Basildon is the financial responsibility of Essex County Council who in seeking to let a contract for the further waste management processing of this waste have a legal duty pursuant to the Public Procurement Regulations and Public Contracts Regulations to seek tenders for such further processing in order to demonstrate that they</p>	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M1?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>have achieved best value for money which is fundamental to all public sector procurement. The next sentence should be amended to read " However in line with the Plans Strategy for the Plan area to become net self-sufficient with regard to waste management, where practicable, the Plan includes a site allocation which if it secures all necessary further planning permission and an Environmental Permit and the owners are successful in tendering for a contract from Essex County Council for waste management it may have capacity to manage the residual waste in the Plan area in the longer term" The reason for this proposed change is to be 'effective' and 'positively' prepared the Plan must reflect the best available data. The proposed IWMF at Rivenhall was refused an Environmental Permit in December 2016 and in order to meet best available technology requirements will need planning permission for a much taller chimney which will be highly contentious and will also need an Environmental Permit. A further sentence should then be added "Other more appropriately located enclosed waste management facilities may come forward on presently unallocated sites or within or outside present areas of search in accordance with Policy 5 as amended." The justification for these changes is to reflect Policy 5 in the Plan.</p>	
1059617, , 220	No	<p>I believe that the following deleted words should be reinstated: - "A competitive tender process will identify the long term management solution for this waste, which could include continued exportation from the Plan area." The above wording needs to be reinstated in order to make the Plan legally compliant. The future treatment/disposal of the stabilised</p>	



Person ID, Organisation, Comment ID	Do you agree with proposed modification M1?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>residual output from the Tovi Eco Park Facility at Basildon is the responsibility of Essex County Council who have a legal duty to the Public Procurement Regulations and Public Contracts Regulations to look for tenders for such further processing in order to demonstrate that they have found the best deal which is fundamental to all public sector procurement. . The next sentence needs amending to state" However in line with the Plans Strategy for the Plan area to become net self-sufficient with regard to waste management, where practicable, the Plan includes a site allocation which if it secures all necessary further planning permission and an Environmental Permit and the owners are successful in tendering for a contract from Essex County Council for waste management it may have capacity to manage the residual waste in the Plan area in the longer term". The reason for this proposed change is to be 'effective' and 'positively' prepared the Plan must reflect the best available data. The proposed IWMF at Rivenhall was refused an Environmental Permit in December 2016 will need planning permission for a much taller chimney and will also need an Environmental Permit.</p>	
1059617, , 228	No	<p>Appendix 1 para 4.21 introduces post 2026 importation of residues from London to be incinerated in the Plan area for energy recovery at consented plant. This specifically allocates Rivenhall to take imported waste which is against Policy 12 Transport and Access of the Plan and is without any clear justification.</p>	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M1?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
988283, Bradwell with Pattiswick Parish Council, 236	No	<p>As things stand this specifically allocates Rivenhall (as the only relevant consented plant in the plan area) to take imported London waste for incineration but without any clear justification. This raises questions over additional HGV movements to and from the plant which have not been indicated. At present, the Waste Disposal Authority is considering long term management options for the stabilised residual waste output of the Tovi Eco Park Facility. In 2016, the annual 200,000 t output from this facility was exported from the Plan area. (Deleted - A competitive tender process will identify the long-term management solution for this waste, which could include continued exportation from the Plan area). In line with the Plans Strategy for the Plan area to become net self-sufficient with regard to its waste management needs where practicable, the Plan includes a site allocation which has capacity to potentially manage this residual waste in the Plan area in the longer term. We repeat our comments as above for modifications 3 and 5. In addition, why was the reference to a competitive tender process deleted? The original wording is legally compliant, whereas the allocation of Rivenhall to take ECC owned material is legally questionable.</p>	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M1?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
1062089, Coggeshall Parish Council, 329	No	<p>This specifically allocates Rivenhall (as the only relevant consented plant in the plan area) to take imported London waste for incineration but without any clear justification. At present, the Waste Disposal Authority is considering long term management options for the stabilised residual waste output of the Tovi Eco Park Facility. In 2016, the annual 200,000 t output from this facility was exported from the Plan area. (Deleted - A competitive tender process will identify the long-term management solution for this waste, which could include continued exportation from the Plan area). In line with the Plans Strategy for the Plan area to become net self-sufficient with respect to its own waste management needs where practicable, the Plan includes a site allocation which has capacity to potentially manage this residual waste in the Plan area in the longer term. In addition, the plan as written cannot support the net self-sufficiency with along waste journey as described as it continues to move waste significant distance throughout the county. Little effort was made to provide consolidation points for smaller sorting of waste as opposed to moving waste to large sorting centres with multiple journeys in addition, please can the review explain why was the reference to a competitive tender process deleted ? We believe the original wording is legally compliant, whereas the allocation of Rivenhall to take ECC owned material is legally questionable. This modification does not provide the intended clarity. We believe the plan should make it clear that this material is 200,000 tonnes per annum (tpa) SRF/RDF because the allocation is specifically known output from the operational Basildon plant to be trucked to the proposed (but not built) Rivenhall site. One of the key aspects of</p>	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M1?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>the review is to ensure legal compliance and we do not believe that is legally compliant. It appears that ECC is proposing to allocate the proposed (but not built) private site at Rivenhall to take output from the Basildon plant. This output is known to be SRF/RDF which ECC legally owns as stated in the operational contract for the Basildon plant. ECC appears to be allocating material it legally owns to a specific private facility without any adherence to their procurement processes and procedures or those associated with the provision of government contracts. This could, clearly, be interpreted as meaning that agreement has been reached between ECC and Gent Fairhead without either the proper planning or procurement procedures being followed. This would be ultra vires the Councils powers and shows a level of pre-determination. ECC is aware that Gent Fairhead, the applicant for the Rivenhall site, has specifically stated in their planning documents submitted to ECC that Rivenhall is the site to which the Basildon specific output can be sent. We believe the plan should be amended to ensure that there is no single allocation made for this specific material. It is waste material that should by law be subject to an open procurement process. Essex County Council has stated that it delayed its final procurement process for SRF/RDF from Basildon for a few years to allow further sites to come on-stream but has nevertheless allocated Rivenhall to take the SRF/RDF from Basildon ahead of that procurement process in the knowledge that only Rivenhall in the plan area and could be used in the stated time horizon. In addition, the inclusion of Rivenhall should now be questioned given that the Environment Agency refused the permit application for the Rivenhall site in</p>	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M1?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>December 2016. The refusal was because of the applicants failure to utilise the Best Available Technology (BAT), air quality emissions with predicted emissions more than twice the legal limits and the stack height that is too low for a plant of this size (changes will contravene the Secretary of State planning conditions 2010 ). Consequently, we believe that ECC is clearly attempting to allocate waste material it owns (SRF Form Basildon) to a plant that has not been built, has no operating licence, will require significant redesign, gas dispersion remodelling, an environmental impact assessment and must go through the planning process again before it is even possible to consider processing waste and this does not appear sensible, never mind legal. Consequently, we require an explanation as to why ECC is allocating a plant (Rivenhall) that has not been built (and is still going through planning) and has no licence for a potential contract to take waste material it (ECC) owns? In addition, the applicants own response to the EA (Fitchner Report in response to second schedule 5 questions from the EA section 2) clearly stated that if the EA permit was refused the plant would not go ahead and given the above allocating waste to the plant is at best irresponsible. Furthermore, and importantly the plan does not consider any alternatives should the Rivenhall plant may not survive the next round of planning or the next EA permit application and as such the plan must be revisited in light of the accreditation problems the Rivenhall plant faces. We also believe that, MAP 5 is incorrect insomuch as it fails to allocate Rivenhall for "residual non-hazardous waste management" as ECC states it wishes to do.</p>	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M1?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
1062112, , 336	No	This change refers only to Rivenhall Airfield as that is the only consented plant that could burn the waste in the plan area. Please explain why Rivenhall Airfield site should accept London waste?	
1062747, , 399	No	We are however disappointed that although Essex aims to be net self-sufficient by the end of the Plan, we now understand that it will still import waste from greater London, so require the County to process and provide landfill We do not consider sufficient weight has been given to the various forms of waste arising from projected Local Plans and associated infrastructure considerations.	
743809, , 466	No	As things stand, this paragraph specifically allocates Rivenhall (as the only relevant consented plant in the plan area) to take imported London waste for incineration but without any clear justification. At present, the Waste Disposal Authority is considering long term management options for the stabilised residual waste output of the Tovi Eco Park Facility. In 2016, the annual 200,000 t output from this facility was exported from the Plan area. (Deleted - A competitive tender process will identify the long-term management solution for this waste, which could include continued exportation from the Plan area). In line with the Plans Strategy for the Plan area to become net self-sufficient with regard to its waste management needs where practicable, the Plan includes a site allocation which has capacity to potentially manage this residual waste in the Plan area in the longer term. Why was the reference to a competitive tender process deleted? Can ECC explain/give justificati0n? The	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M1?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>original wording is legally compliant, whereas the allocation of Rivenhall to take ECC owned material is legally questionable. This does not provide clarity. The plan should make it clear that this material is 200,000 tonnes per annum (tpa) SRF/RDF because the allocation is the specifically known output from the operational Basildon plant - to be trucked to the proposed (but not yet built) Rivenhall site. It is not clear whether this is legally compliant. ECC wants to allocate the proposed (but not built) private site at Rivenhall to take output from the ECC Basildon plant. This output is known to be SRF/RDF which ECC legally owns (as stated in the operational contract for the Basildon plant). Therefore ECC appears to be confusing planning and procurement by allocating material it legally owns to a specific privately owned site. ECC is aware that gent Fairhead, (applicant for the Rivenhall site) has specifically stated in its planning documents submitted to ECC that Rivenhall is the site to which the Basildon specific output can be sent. Amend the plan : ensure that there is no single allocation made for this specific material. Such material should by law be subject to an open procurement process by ECC. ECC has stated that it delayed its final procurement process for SRF/RDF from Basildon for a few years to allow further sites to come on-stream but ECC has nevertheless allocated Rivenhall to take the SRF/RDF from Basildon ahead of that procurement process knowing that only Rivenhall in the plan area could be used in the stated time horizon. Even that assumption should now be questioned please. Note 1: the environment agency refused the permit application for the Rivenhall site (December 2016) because of the failure to</p>	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M1?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>demonstrate bat. Note 2: as the site does not have full planning consents nor a licence to operate and though not to be directly considered here, i would call the inspectors attention to the planned short stack. Yet would not current technical knowledge have dictated long ago that a much higher stack would be necessary for such an undertaking? This is also further compounded by the water processing cycle situation. On the part of ECC, it would appear that it is therefore attempting to allocate a private plant (at Rivenhall) that has not yet been built (and is still going through planning). Importantly, ECC has no licence for a potential contract to take waste material it owns. Map 5 fails to allocate Rivenhall for "residual non-hazardous waste management" as ECC states it wishes to do.</p>	
1063344, , 474	No	<p>As things stand this specifically allocates Rivenhall (as the only relevant consented plant in the plan area) to take imported London waste for incineration but without any clear justification. At present, the waste disposal authority is considering long term management options for the stabilised residual waste output of the Tovi Eco Park Facility. In 2016, the annual 200,000 t output from this facility was exported from the Plan area. (Deleted - A competitive tender process will identify the long-term management solution for this waste, which could include continued exportation from the Plan area). In line with the Plans Strategy for the Plan area to become net self-sufficient with regard to its waste management needs where practicable, the Plan includes a site allocation which has capacity to potentially manage this residual waste in the Plan area in the longer term. This does not seem to be legally compliant as ECC is planning</p>	



Person ID, Organisation, Comment ID	Do you agree with proposed modification M1?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>to allocate material from the Basildon plant, which it owns to the proposed Rivenhall facility whereas the allocation of material owned by ECC should be subject to an open procurement process. The plan should be amended to ensure there is no single allocation, for this specific material . Essex county council stated that it postponed its final procurement process for SRF/RDF from Basildon for a several years so that further sites could come into operation yet has allocated Rivenhall to take the SRF/RDF from Basildon ahead of that procurement process in the knowledge that Rivenhall would be the only site in the plan area available in the stated time horizon. Even that assumption should be questioned since the environment agency refused the permit application for the Rivenhall site in December 2016 due to the failure to demonstrate bat. ECC is thus trying to allocate a plant that has not been built (and is still going through planning) and has no licence for a potential contract to take waste material it owns. In addition, map 5 fails to allocate Rivenhall for residual non-hazardous waste management as ECC states it wishes to do. In addition, why was the reference to a competitive tender process deleted? The original wording is legally compliant, whereas the allocation of Rivenhall to take ECC owned material is legally questionable.</p>	
746050, Rivenhall Parish Council, 480	No	<p>The Parish Council would submit there is neither clarity nor justification as to why the Rivenhall site should take London waste post 2026. As things stand the change clearly refers only to Rivenhall as that is the only consented plant (albeit that the consent is incomplete) in the Plan area.</p>	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M1?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
618724, , 513	No	<p>As things stand this specifically allocates Rivenhall (as the only relevant consented plant in the plan area) to take imported London waste for incineration but without any clear justification. In addition, why was the reference to a competitive tender process deleted? The original wording is legally compliant, whereas the allocation of Rivenhall to take ECC owned material is legally questionable. This does not provide clarity. The plan should make it clear that this material is 200,000 tonnes per annum (tpa) SRF/RDF. The waste is specifically a known output from the operational Basildon plant allocated to the proposed (but not built) Rivenhall site. The proposed text is an improvement on the vague other waste previously proposed but still does not properly define the material. It is not clear that this is legally compliant. ECC is proposing to allocate the proposed (but not built) private site at Rivenhall to take the SRF/RDF output from the Basildon plant. This output is waste material which ECC legally owns - as stated in the operational contract for the Basildon plant. Therefore ECC appears to be confusing planning and procurement by allocating material it legally owns to a specific private site. ECC is also aware that gent Fairhead, the applicant for the Rivenhall site has specifically stated in planning documents submitted to ECC that Rivenhall is the site to which the Basildon specific output can be sent. The plan should be amended to ensure that there is no single allocation made for this specific material. It is waste material that should by law be subject to an open procurement process. Essex county council has stated that it delayed its final procurement process for SRF/RDF from Basildon for a few years to allow further sites to come on-stream but has</p>	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M1?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>nevertheless allocated Rivenhall to take the SRF/RDF from Basildon ahead of that procurement process knowing that only Rivenhall in the plan area could be used in the stated time horizon. However even that assumption could now be questioned given that the environment agency refused the permit application for the Rivenhall site in December 2016 because of the failure to demonstrate bat. ECC is therefore attempting to allocate its own waste to a plant that has not been built (and is still going through planning) and has no licence, and has delayed its procurement tender process in order in part in the hope that Rivenhall will be built. How is that legally compliant? In addition, map 5 fails to allocate Rivenhall for residual non-hazardous waste management as ECC states it wishes to do.</p>	
911132, Cressing Parish Council, 523	No	<p>Currently, this specifically allocates Rivenhall (as the only relevant consented plant in the plan area) to take imported London waste for incineration but without any clear justification. This raises questions over additional HGV movements to and from the plant. At present, the Waste Disposal Authority is considering long term management options for the stabilised residual waste output of the Tovi Eco Park Facility. In 2016, the annual 200,000 t output from this facility was exported from the Plan area. (Deleted - A competitive tender process will identify the long-term management solution for this waste, which could include continued exportation from the Plan area). In line with the Plans Strategy for the Plan area to become net self-sufficient with regard to its waste management needs where practicable, the Plan includes a site</p>	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M1?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>allocation which has capacity to potentially manage this residual waste in the Plan area in the longer term. In addition, the reference to a competitive tender process appears to have been deleted. The original wording is legally compliant, whereas the allocation of Rivenhall to take ECC owned material is legally questionable. This does not provide clarity. The plan should be clear that this material is 200,000 tonnes per annum (TPA) SRF/RDF because the allocation is a specifically known output from the operational Basildon plant to be trucked to the proposed Rivenhall site. It is not clear that this is legally compliant. It is proposed to allocate the proposed private site at Rivenhall to take the known SRF/RDF output from the Basildon plant. This output is legally owned by ECC as stated in the operational contract for the Basildon plant. Therefore planning and procurement appears to be confused by allocating material ECC legally owns to a specific site. The applicant for the Rivenhall site has specifically stated in planning documents submitted to ECC that the Basildon output can be sent to the Rivenhall site. The plan should be amended to ensure that there is no single allocation made for this specific material owned by ECC. It is waste material that should by law be subject to an open procurement process. ECC has stated that it delayed its final procurement process for SRF/RDF from Basildon for a few years to allow further sites to come on-board but has nevertheless allocated Rivenhall to take the SRF/RDF from Basildon ahead of that procurement process knowing that only Rivenhall in the plan area could be used in the stated time horizon. However that assumption should now be questioned given that the Environment Agency refused the permit</p>	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M1?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>application for the Rivenhall site in December 2016 because of the failure to demonstrate BAT (best available technology). ECC is therefore attempting to allocate a plant that has not been built (and is still going through planning) and has no licence, for a potential contract to take waste material it owns. In addition, map 5 fails to allocate Rivenhall for residual non-hazardous waste management (previously "other waste") as ECC states it wishes to do.</p>	

### Modification M2 - Paragraph 5.3

Person ID, Organisation, Comment ID	Do you agree with proposed modification M2?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
1062747, 400	No	<p>Future generations may not think you have given sufficient consideration to the suitability of the geology for the storage of hazardous and/or radioactive materials.</p>	

### Modification M3 - Policy 1 'Need for Waste Management Facilities'

Person ID, Organisation, Comment ID	Do you agree with proposed modification M3?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
985065, 39	No	This is not clear! The term 'other waste' is totally vague - it should be made clear that this material is the 200,000 tonnes per annum (TPA) SRF/RDF - because you know that this is the output from the operational Basildon plant - that would have to be brought in by lorry to the proposed (but not built) Rivenhall site.	
983638, 62	No	There is no clarity provided to indicate what this 'other waste' is. It is, in fact, 200,000 tonnes per annum of SRF/RDF from the Basildon plant, which ECC wants to send to the proposed site at Rivenhall Airfield. This should be clearly stated.	
1060507, Coggeshall Neighbourhood Plan Committee, 81	No	THE PLAN SHOULD CLARIFY THAT THIS MATERIAL IS 200,000 tonnes per annum (TPA) SRF/RDF. THIS IS KNOWN TO BE OUTPUT FROM THE OPERATION BASILDON SITE WHICH WILL BE SENT VIA ROAD TO THE PROPOSED SITE AT RIVENHALL.	
477311, 90	No	IT DOES NOT PROVIDE CLARITY. THE PLAN SHOULD MAKE IT CLEAR THAT THIS MATERIAL (ORIGINALLY CALLED OTHER WASTE ) IS 200,000 tonnes per annum (TPA) SRF/RDF BECAUSE THE ALLOCATION IS A SPECIFICALLY KNOWN OUTPUT FROM THE OPERATIONAL BASILDON PLANT TO BE TRUCKED TO THE PROPOSED (BUT NOT BUILT) RIVENHALL SITE.	
1061659, 175	No	IT DOES NOT CLEAR DETAIL THE PLAN SHOULD MAKE IT PLAIN and CLEAR THAT THIS MATERIAL IS 200,000 tonnes per annum (TPA) SRF/RDF BECAUSE THE ALLOCATION IS SPECIFICALLY KNOWN OUTPUT FROM THE OPERATIONAL BASILDON PLANT TO BE TRUCKED TO THE PROPOSED (BUT NOT BUILT) RIVENHALL SITE.	
1061682, 193	No	This does not clearly define what exactly "other waste" actually is. It should be made clear that the 200,000 tonnes of waste per year will be SRF/RDF as this has been allocated from the Basildon plant to be driven down to the Rivenhall site. This site	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M3?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		has and may not still be built and is adds additional pollution.	
1059617, 223	No	I object to this as it doesn't provide any clarity. The plan should be clear that this is 200,000 tonnes per annum (tpa) SRF/RDF as this is specifically known output from the operational plant to be transported 38miles along already over capacity a120 to the proposed but not built and no environmental permit Rivenhall site.	
988283, Bradwell with Pattiswick Parish Council, 231	No	It does not provide clarity. The plan should make it clear that this material (originally called other waste) is 200,000 tonnes per annum (tpa) SRF/RDF because the allocation is a specifically known output from the operational Basildon plant to be trucked to the proposed (but not built) Rivenhall site.	
1062089, Coggeshall Parish Council, 323	No	This modification does not provide the intended clarity. We believe the plan should make it clear that this material is 200,000 tonnes per annum (tpa) SRF/RDF because the allocation is specifically known output from the operational Basildon plant to be trucked to the proposed (but not built) Rivenhall site.	
743809, 453	No	This does not provide clarity. The plan should make it clear that this material is 200,000 tonnes per annum (tpa) SRF/RDF because the allocation is the specifically known output from the operational Basildon plant - to be trucked to the proposed (but not yet built) Rivenhall site.	
746050, Rivenhall Parish Council, 478	No	The change fails to provide clarity. The Plan should instead make it clear that this material is 200,000 tonnes per annum of the output from the Basildon plant which is a specific waste type (SRF/RDF).	
618724, 508	No	This does not provide clarity. The plan should make it clear that this material is 200,000 tonnes per annum (tpa) SRF/RDF. The waste is specifically a known output from the operational Basildon plant allocated to the proposed (but not built) Rivenhall site. The proposed text is an improvement on the vague other waste previously proposed but still does not properly define the	

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		material.	
911132, Cressing Parish Council, 518	No	This does not provide clarity. The plan should be clear that this material is 200,000 tonnes per annum (TPA) SRF/RDF because the allocation is a specifically known output from the operational Basildon plant to be trucked to the proposed Rivenhall site.	

#### Modification M4 - Policy 2 'Safeguarding Waste Management Sites and Infrastructure'

Person ID, Organisation, Comment ID	Do you agree with proposed modification M4?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
1062913, Anglian Water, 443	Yes	Anglian Water is in support of MAIN 4 Policy 2.	However, the text refers to WTC, this should be WRC (Water Recycling Centre)

#### Modification M5 – Policy 3 'Strategic Site Allocations'

Person ID, Organisation, Comment ID	Do you agree with proposed modification M5?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
985065, 40	No	Is this legally compliant? Essex County Council is proposing that an unbuilt (and not yet fully approved) private site at Rivenhall, take output from the Basildon plant. This output is known to be (TPA) SRF/RDF which Essex County Council legally owns, as stated in the operational contract for the Basildon plant. Therefore, ECC appears to be disregarding the planning process that the Rivenhall site is engaged in, and jumping ahead to name the Rivenhall site as the one that will receive Basildon's output. The plan should be amended to ensure that there is no single	



Person ID, Organisation, Comment ID	Do you agree with proposed modification M5?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		allocation made for this specific material. It is waste material that should by law be subject to an OPEN PROCUREMENT PROCESS. ECC has stated that it delayed its final procurement process for SRF/RED from Basildon ahead of that procurement process, knowing that only Rivenhall in the plan area could be used in the stated time horizon. However, even that assumption should now be questioned, given that the Environment Agency has refused the permit application for the Rivenhall site (in December 2019) because of their failure to demonstrate Best Available Technology (BAT). ECC is therefore attempting to allocate a plant that HAS NOT BEEN BUILT, IS STILL GOING THROUGH PLANNING, AND HAS NO LICENCE for a potential contract to take waste material that it owns. IN ADDITION, MAP 5 FAILS TO ALLOCATE RIVENHALL FOR RESIDUAL NON-HAZARDOUS WASTE MANAGEMENT AS ECC STATES IT WISHES TO DO.	
1059617, 54	No	I disagree with the proposed appendix 4 policy 3 clause 3 updates "other waste management" to IWMF2 (Rivenhall airfield). ECC are proposing to allocate the proposed (not built) private site at Rivenhall to take output from the Basildon plant which ECC legally own as stated in the operational contract from the Basildon plant. ECC are confusing planning and procurement by allocating material it legally owns to a specific site. Agent Fairhead the applicant for the Rivenhall site has specifically stated in planning applications submitted to ECC that Rivenhall is the site to which the Basildon specific output can be sent. The legality of this seems very questionable?	The plan should be changed to ensure that there is no one specific allocation made for this specific material and that the correct open procurement process is taken, especially as the Rivenhall sites environmental permit was refused in December 2016. ECC are trying to allocate a site that has not been built and is still going through the planning process and has no license for a potential contact to take waste material that it owns. Map 5 fails to allocate Rivenhall for residual non-hazardous waste management as ECC states it wishes to do.
984614, 58	No	This may not be legal. ECC is proposing that waste from the Basildon plant be allocated to Rivenhall which is yet to be constructed. This output is known to be SRF/RDF which ECC legally owns as stated in the operational contract for the Basildon plant. It appears that ECC is allocating material it owns to a specific site thus confusing the planning and procurement process. ECC is aware that Gent Fairhead has, in planning	The plan should be amended to ensure that there is no single allocation made for the waste material. It is a requirement in law that waste material should be subject to an open procurement process. ECC has stated that it delayed for a year its final procurement process for the Basildon SRF/RDF allowing further sites to become operation and yet

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		documents submitted to ECC made specific reference to the Basildon output and that it is to be sent to Rivenhall	has nevertheless allocated Rivenhall to take it ahead of that procurement process. This was done with the knowledge that only Rivenhall could be used in the stated time horizon. In light of the December 2016 decision by the Environmental Agency to refuse an operating licence this assumption should now be questioned. ECC is therefore attempting to allocate waste material it owns to a plant that has not been built, is still going through planning amendments and furthermore has no licence to operate
1057927, Hayleys Padfield Ltd, 64	No	The inspector recommended a number of modifications which were deemed necessary to make the plan sound/legally compliant and appropriate for adoption. One such recommendation was that discounting a site purely on the grounds that it is situated in the Green Belt renders the plan unsound. The inspectors recommendations in relation to Dollymans Farm and its subsequent allocation in our view, is a clear steer that other sites discounted purely because of their location in the Green Belt should also be reconsidered. As set out within paragraph 6 of the NPPW, local authorities should work collaboratively with local planning authorities and first look for suitable sites and areas outside the Green Belt for waste management facilities that, if located in the Green Belt, would be inappropriate development. There is now an identified need for 7.05mt of inert waste capacity over the plan period and Essex County Council has not identified enough sites for inert waste disposal to meet the calculated demand over the plan period, with an increased shortfall of 4.47mt. Therefore in accordance with paragraph 6 of the NPPW and paragraph 83 of the NPPF, sites within the Green Belt should be considered to meet the shortfall in need. The methodology of Site Assessment and Selection Report states that Stage 2 introduces a sequential approach whereby sites that are in the green belt or score red for traffic and transportation are held back	Allocate Hastingwood, Harlow (W19) as an inert waste recycling site, add to Appendix 4, Policy 3, Clause 2 (Inert Waste Recycling) and add table to Appendix 18 accordingly.

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		<p>(unless there are exceptional circumstances). Rather than being excluded completely such as at Stage 1, sites in the green belt or that do not comply with transport policy would only be considered for allocation if, after the rest of the assessment had been carried out through Stage 3, insufficient sites that passed Stage 2 were suitable for meeting the capacity gap associated with a particular waste stream. . Despite this statement which is in line with the NPPF and NPPW guidance set out above, the increase in shortfall and the inspectors observations, Essex County Council continues to take a blanket approach to rejecting all landfill/inert waste disposal sites within the Green Belt, regardless of other sustainability factors, with only Dollymans Farm being allocated in response to concerns raised by the inspector in relation to that specific site. Furthermore the blanket approach has resulted in a lack of waste facilities and in particular inert waste recycling facilities in the south of the County. As a result the plan is not in accordance with the three dimensions of sustainable development, namely economic, social and environmental. In particular it will result in long journeys within and out of the County to dispose of waste. Especially given that it is the southern part of the county which is the most populated. As a result there is a strong and over reliance on inert waste sites in the North of Essex and a long distance in sustainability terms from Harlow, which does not accord with the Spatial Strategy. The Spatial Strategy specifically sets out that new waste developments should principally be directed to key urban centres including Harlow. An example of a site which should be allocated in the Plan to ensure it is sound/legally compliant is Hastingwood, Harlow (W19). This 1.35 hectare Green Belt site was submitted by the landowner for consideration for either inert or non-inert waste recycling and was discounted, like Dollymans Farm, purely on the grounds of its location in the Green Belt. It is currently made up of 0.96 hectares of previously developed land and 0.39 hectares of agricultural land. At the time of submission the majority of the site had been</p>	

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		<p>used for many years for the storing, sorting and recycling of aggregates, albeit without the benefit of planning permission. Since that time the landowner has successfully acquired a Certificate of Lawful Use for the site to be used for the storage, screening and distribution of recycled of road plantings (and use of associated plant and equipment) (LPA Ref: ESS/39/EPF). The majority of the site can therefore now be described as previously developed land which in our view is now a material consideration in favour of its allocation. The site was discounted on the grounds that it was situated in the Green Belt. However, it scored very well in the sustainability appraisal with benefits of allocating the site including its location is a very sustainable location in close proximity to Harlow which is an area of the County that does not have any inert waste disposal facilities; it's location next to Junction 7 of the M11, a major transport corridor; the significant distance of the site from residential properties; and the low quality nature of the Green belt land particularly given that over 2/3 of it is previously developed land.</p>	
983638, 66	No	<p>ECC legally owns SRF/RDF waste at the Basildon site, which it is proposing to remove from the Basildon plant and allocate to a specific site, namely the proposed, private site at Rivenhall Airfield. The applicant for the Rivenhall site, Gent Fairhead, has stated in documents submitted to ECC that the Basildon SRF/RDF waste can be sent to their Rivenhall site. Therefore, I do not believe that this modification is legally compliant. This plan needs to be amended, so that there is not one single allocation available for this ECC owned waste. Although ECC delayed its final procurement process for the SRF/RDF from Basildon for several years, to allow for further sites to be considered, it has still allocated Rivenhall to take this waste, prior to any other potential sites being identified. If the purpose for this is to allow the process to be completed within specified time frames, this may not</p>	

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		happen, due to the fact that the Environmental Agency has refused the Rivenhall site a permit, due to its failure to demonstrate BAT. This means that ECC is trying to allocate a plant that has no licence, and may never be built, for a contract to take ECC owned waste. Also, ECC has stated that it wants the Rivenhall site to take 'residual non-hazardous waste', but this is not stated on MAP 5.	
487944, Rochford District Council, 79	No	The Council would also like to point out that the location of Dollymans Farm on Map 5: Strategic Site Allocations is not identified correctly; it is located further to the south east nearer the Fair Glen junction.	
1060507, Coggeshall Neighbourhood Plan Committee, 82	No	It is not obvious that this modification is legal. Essex county council proposes to assign the proposed, private, Rivenhall site to take output from the plant in Basildon. This output is known to be SRF/RDF and owned by ECC as set out in the operational contract for the Basildon plant. ECC is therefore confusing planning and procurement by allocating material it legally owns to a specific site. ECC is aware that the applicant for the Rivenhall site, gent Fairhead, has unambiguously stated in planning documents submitted to ECC that Rivenhall is the site to which the Basildon specific output can be sent. No single allocation should be made for this specific material. The plan should be amended to reflect this. By law this waste material should be subject to an open procurement process. ECC has said that its final procurement process for SRF/RDF from Basildon has been delayed for a few years to allow further sites to become available. However, it has nonetheless allocated Rivenhall to take the SRF/RDF from Basildon in advance of that procurement process in the knowledge that only Rivenhall could be used in the stated time scale in the area covered by this plan. This assumption should now be questioned given that the environment agency refused the permit application for the Rivenhall site in December 2016 due to the failure to demonstrate bat. ECC is therefore attempting to allocate an unbuilt plant which is still going through	

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		the planning process to take output from the Basildon plant. In addition ECC has no licence for a potential contract to take waste material it owns. ECC states that Rivenhall should be allocated for residual non-hazardous waste management. Map 5 does not allocate the riven hall site for this use.	
477311, 91	No	<p>It is not clear that this is legally compliant. ECC is proposing to allocate the proposed (but not built) private site at Rivenhall to take the known SRF/RDF output from the Basildon plant. This output is legally owned by ECC as stated in the operational contract for the Basildon plant. Therefore ECC appears to be confusing planning and procurement by allocating material it legally owns to a specific site. ECC is aware that gent Fairhead, the applicant for the Rivenhall site has specifically stated in planning documents submitted to ECC that Rivenhall is the site to which the Basildon specific output can be sent. The plan should be amended to ensure that there is no single allocation made for this specific material owned by ECC. It is waste material that should by law be subject to an open procurement process. Essex county council has stated that it delayed its final procurement process for SRF/RDF from Basildon for a few years to allow further sites to come on-stream but has nevertheless allocated Rivenhall to take the SRF/RDF from Basildon ahead of that procurement process knowing that only Rivenhall in the plan area could be used in the stated time horizon. However even that assumption should now be questioned given that the environment agency refused the permit application for the Rivenhall site in December 2016 because of the failure to demonstrate bat (best available technology). ECC is therefore attempting to allocate a plant that has not been built (and is still going through planning) and has no licence, for a potential contract to take waste material it owns. In addition, map 5 fails to allocate Rivenhall for residual non-hazardous waste management (previously "other waste ") as ECC states it wishes to do.</p>	

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477311, 96	No	<p>There is one relevant consented plant in the plan area and that is Rivenhall. The heat produced will not be supplied to a district heat network. It would only be used within the plant itself and so it is not clear how this could be described as a commercial or industrial user in the sense of having some separation.</p> <p>Furthermore, there is a question over the CHP status of the plant (see mod 19 comments). Following the s73 changes, will heat have to be vented and therefore wasted? If Rivenhall is no longer CHP, the plan descriptions for Rivenhall are not justified.</p>	
1060687, 102	No	<p>It is unclear whether this is legally compliant. ECC is proposing to allocate the proposed (but not built) private site at Rivenhall to take output from the Basildon plant. This output is known to be SRF/RDF which ECC legally owns as stated in the operational contract for the Basildon plant. Therefore ECC appears to be confusing planning and procurement by allocating material it legally owns to a specific site. ECC is aware that gent Fairhead, the applicant for the Rivenhall site has specifically stated in planning documents submitted to ECC that Rivenhall is the site to which the Basildon specific output can be sent.</p>	<p>I believe the plan should be amended to ensure that there is no single allocation made for this specific material. It is waste material that should by law be subject to an open procurement process. Essex county council has stated that it delayed its final procurement process for srf/rdf from Basildon for a few years to allow further sites to come on-stream but has nevertheless allocated Rivenhall to take the srf/rdf from Basildon ahead of that procurement process knowing that only Rivenhall in the plan area could be used in the stated time horizon. However even that assumption should now be questioned given that the environment agency refused the permit application for the Rivenhall site in December 2016 because of the failure to demonstrate bat. ECC is therefore attempting to allocate a plant that has not been built (and is still going through planning) and has no licence for a potential contract to take waste material it owns. In addition, map 5 fails to allocate Rivenhall for residual non-hazardous waste management as ECC states it wishes to do.</p>
1053830, 103	No	<p>There is a conflict here about ownership by ECC of the Basildon waste and the allocation of this waste to the unbuilt private Rivenhall site. Rivenhall is not owned by ECC and Gent Fairhead</p>	<p>Amend to indicate that no single site is allocated to this specific waste output from the Basildon site. The waste must be allocated on a legal tender</p>

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		the owners of Rivenhall would have to tender for this waste in a competitive environment. The Rivenhall site does not currently have an Environment Licence or therefore a valid planning permission consummate with running the site to manage any waste. Given the ECC timelines only Rivenhall has an opportunity to bid for this waste. Therefore there is a clear conflict here with regards to procurement and planning.	system. ECC should be looking for other destinations for this waste as Rivenhall is not with a valid Environment Licence and its planning permission, pushed through by ECC, and does not show Best Available Technology. ECC should revisit the timelines for allocating this waste and its designation so that all other competitors other than the Rivenhall site are not excluded.
735401, Basildon Borough Council, 129	Yes	Support change to Clause 1 as this is a factual update to the name of Basildon Waste Water Treatment Works.	
1061522, 145	No	I question the legality of this and believe Essex County Council has prejudged the outcome. Furthermore, the base of the ECC support for the proposal has been undermined by the Environment Agency refusing a permit (Dec 2016) thus indicating poor decision making at ECC.	Amend to indicate that no single site is allocated to this specific waste output from the Basildon site. The waste must be allocated on a legal tender system. ECC should be looking for other destinations for this waste as Rivenhall is not with a valid Environment Licence and its planning permission, pushed through by ECC, and does not show Best Available Technology. ECC should revisit the timelines for allocating this waste and its designation so that all other competitors other than the Rivenhall site are not excluded.
735401, Basildon Borough Council, 149	No	Clause 4 - Object to principle of Modification 23, but if Inspector is minded to approve accept that Clause 4 would need to change.	Remove Dollymans Farm from the Waste Local Plan as a waste development/land use allocation.
1061574, 155	No	Essex County Council is proposing that output from the Basildon site - potentially 200,000 tons per annum, the equivalent of 5264 x 38 ton truckloads - is transported by road to Rivenhall. This is not environmentally sustainable. The proposed site at Rivenhall has been refused a licence to operate by The Environment Agency and although the developer is proposing to seek an	



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		<p>appeal of this decision, it will involve new plans to vary the height of the stack - maybe 60m higher than already approved. I cannot see how this is either legal, because of the lack of any due procurement process, nor, given the unbuilt nature of the intended facility of this waste material, is a viable way to proceed.</p>	
923503, A H Philpot & Sons, 168	Yes	<p>Modification 5, which consists of a change to Policy 3 to allocate Dollymans Farm, Basildon/Rochford (L(i)16) for inert landfill is strongly supported in planning terms. As discussed in detail at the Examination in Public, Dollymans Farm represents a suitable and sustainable site allocation within the Development Plan. Its allocation is required in order for the plan to be considered to be sound as required by the National Planning Policy Framework. In this regard the land at Dollymans Farm benefits from being ideally located in very close proximity to the urban centres of Basildon, Wickford and Rayleigh. It is on a main transport corridor (the A130). Therefore allocation of this land for an inert waste disposal and inert waste recycling centre is a very sustainable location for the facility. The allocation of this site for the disposal of inert waste, is recognition of the need to allocate a site in closest proximity to the largest centres of population within the County. Prior to the allocation of Dollymans Farm, it was acknowledged within the Spatial Portrait that there were no available inert waste sites in the Basildon area. As acknowledged at the Examination in Public, this site is a former borrow pit and is of very poor visual amenity value. Restoration of the site following the disposal of inert waste will enable an improved topography of the site, in keeping with the surrounding landscape. The site is also located a long distance from neighbouring residential dwellings to ensure that there would be no adverse impact upon the amenity of neighbouring amenity and benefits from good access. In addition, Dollymans Farm has also been promoted for use as a recycling centre, in association with the inert waste use over the plan period. As acknowledged at the Examination in Public, the</p>	

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		<p>argument for the need for a recycling centre was not so overwhelming that it would render the overall plan unsound. However, a recycling centre would be a suitable use in conjunction with the disposal of inert waste. Whilst the applicant's preference would be for an inert waste recycling facility to be formally allocated as part of the Waste Local Plan, it is acknowledged that a suitable case could be made as part of a future planning application. This was discussed at the Examination in Public and it is the applicant's intention to proceed on this basis. Overall the amendment to Policy 3 is strongly supported and provides a plan that is justified, effective and consistent with national policy as required by the NPPF.</p>	
987897, 170	No	<p>I believe there is a compliance issue here. How can ECC lawfully allocate waste it owns the SRF/RDF output from the Basildon plant to a site that is not yet built, and for which, currently, no planning permission exists to enable it to be built in a manner compliant with the Environment Agency's requirements as to stack height? ECC is relying on the applicant Gent Fairheads statement in its planning documents that the Rivenhall site is the one to which Basildon specific outputs can be sent; this could, clearly, be interpreted as meaning that agreement has been reached between ECC and Gent Fairhead without either the proper planning or procurement procedures being followed. This would be ultra vires the Council's powers. The plan should be amended to ensure that there is no single allocation made for this specific material, in case, the proper procedures having been followed, the Rivenhall site is unable to proceed to construction. It is waste material that should by law be subject to an open procurement process. Essex County Council has stated that it delayed its final procurement process for SRF/RDF from the Basildon plant for a few years to allow further sites to come on-stream, and yet the plan allocates the Rivenhall site to take the SRF/RDF from Basildon ahead of that procurement process. It is not prudent to assume that Rivenhall will be operational in time to</p>	

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		<p>take such waste, even ignoring the breach of the procumbent rules implicit in allocating waste to it, given that the Environment Agency refused the permit application for the Rivenhall site in December 2016. Why would ECC allocate a plant that has not been built (and is still going through planning) and has no licence for a potential contract to take waste material it owns? In addition, map 5 fails to allocate Rivenhall for residual non-hazardous waste management as ECC states it wishes to do.</p>	
1061659, 176	No	<p>It is questionable whether this is legally compliant. ECC is proposing to allocate the proposed (but not built) private site at Rivenhall to take output from the Basildon plant. This output is known to be SRF/RDF which ECC legally owns as stated in the operational contract for the Basildon plant. Therefore ECC appears to be confusing planning and procurement by allocating material it legally owns to a specific site. ECC is aware that gent Fairhead, the applicant for the Rivenhall site has specifically stated in planning documents submitted to ECC that Rivenhall is the site to which the Basildon specific output can be sent. The plan should be amended to ensure that there is no single allocation made for this specific material. It is waste material that should by law be subject to an open procurement process. Essex county council has stated that it delayed its final procurement process for SRF/RDF from Basildon for a few years to allow further sites to come on-stream but has nevertheless allocated Rivenhall to take the SRF/RDF from Basildon ahead of that procurement process knowing that only Rivenhall in the plan area could be used in the stated time horizon. However even that assumption should now be questioned given that the environment agency refused the permit application for the Rivenhall site in December 2016 because of the failure to demonstrate bat. ECC is therefore attempting to allocate a plant that has not been built (and is still going through planning) and has no licence for a potential contract to take waste material it owns. In addition,</p>	

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		map 5 fails to allocate Rivenhall for residual non-hazardous waste management as ECC states it wishes to do.	
1061676, 190	No	<p>It is not clear that this is legally compliant. ECC is proposing to allocate the proposed (but not built) private site at Rivenhall to take output from the Basildon plant. This output is known to be SRF/RDF which ECC legally owns as stated in the operational contract for the Basildon plant. Therefore ECC appears to be confusing planning and procurement by allocating material it legally owns to a specific site. ECC is aware that gent Fairhead, the applicant for the Rivenhall site has specifically stated in planning documents submitted to ECC that Rivenhall is the site to which the Basildon specific output can be sent. The plan should be amended to ensure that there is no single allocation made for this specific material. It is waste material that should by law be subject to an open procurement process. Essex county council has stated that it delayed its final procurement process for SRF/RDF from Basildon for a few years to allow further sites to come on-stream but has nevertheless allocated Rivenhall to take the SRF/RDF from Basildon ahead of that procurement process knowing that only Rivenhall in the plan area could be used in the stated time horizon. However even that assumption should now be questioned given that the environment agency refused the permit application for the Rivenhall site in December 2016 because of the failure to demonstrate bat. ECC is therefore attempting to allocate a plant that has not been built (and is still going through planning) and has no licence for a potential contract to take waste material it owns. In addition, map 5 fails to allocate Rivenhall for residual non-hazardous waste management as ECC states it wishes to do.</p>	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M5?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
1061682, 194	No	<p>It is still unclear if this is even legally allowed. Essex County Council are proposing to allocate the Rivenhall site which as stated above has not even been built or received a permit, to take the SRF/RDF waste from Basildon which coincidentally is owned by ECC as was stated in the operational contract for the plant. It would therefore appear that ECC are allocating their own waste to a specific site. ECC are also aware that the applicant for the site at Rivenhall, Gent Fairhead has stated in their planning documentation that the site at Rivenhall will take the output from the Basildon site. This is not only confusing the planning and procurement by doing this, it is also a conflict of interests I feel. This should therefore be amended so that the waste material should go through an open procurement process and not all be pushed towards an already environmentally unsound plant. Just to boost their figures. ECC had delayed the procurement process for SRF/RDF from Basildon to allow further sites to come forward, yet have still allocated Rivenhall to take all the waste knowing that this site would be the only one able to take the waste in the time frame. In view of the recent environmental agency permit refusal and the sites failure to demonstrate BAT, their assumption should be questioned as the plant has not been built and has not licence in which to enable a contract between the companies to take the waste.</p>	
1061711, Goslings Granary, 209	No	<p>The first sentence of Policy 3 should be amended to read: - "Waste management at the following locations (see Strategic Site Allocations Map) will be permitted where proposals take into account the requirements identified in the relevant development principles and meet Development Management Criteria." The justification for this change is to reflect the requirements of the Plan of Policy 10 Development Management Criteria.</p>	
1059617, 224	No	<p>I object to the allocation of waste which ECC legally own being allocated to the proposed (not built and no environmental permit) private Rivenhall site from the Basildon plant. ECC appear to be allocating waste without any open procurement procedures. The</p>	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M5?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>plan must be amended to ensure that ECC is acting legally and also Policy 12 Transport and Access of the Plan is meeting so a site closer to the Basildon plant is allocated. In addition to the above Map 5 fails to allocate Rivenhall for residual non-hazardous waste management as ECC states it intends to.</p>	
<p>988283, Bradwell with Pattiswick Parish Council, 232</p>	<p>No</p>	<p>It is unclear whether this is legally compliant. ECC is proposing to allocate the proposed (but not built) private site at Rivenhall to take the known SRF/RDF output from the Basildon plant. This output is legally owned by ECC as stated in the operational contract for the Basildon plant, therefore ECC appears to be confusing planning and procurement by allocating material it legally owns to a specific site. ECC is aware that Gent Fairhead, the applicant for the Rivenhall site, has specifically stated in planning documents submitted to ECC that Rivenhall is the site to which the Basildon specific output can be sent. The plan should be amended to ensure that there is no single allocation made for this specific material owned by ECC. It is waste material that should by law be subject to an open procurement process. Essex County Council has stated that it delayed its final procurement process for SRF/RDF from Basildon for a few years to allow further sites to come on-stream, but has nevertheless has allocated Rivenhall to take the SRF/RDF from Basildon ahead of that procurement process knowing that only Rivenhall in the plan area could be used in the stated time horizon. That assumption should now be questioned given that the Environment Agency refused the permit application for the Rivenhall site in December 2016 because of the failure to demonstrate bat (best available technology). ECC is therefore attempting to allocate a plant that has not been built (and is still going through planning) and has no licence, for a potential contract to take waste material it owns. In addition, map 5 fails to allocate Rivenhall for residual non-hazardous waste management (previously "other waste") as ECC states it wishes to do.</p>	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M5?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
1062089, Coggeshall Parish Council, 324	No	<p>One of the key aspects of the review is to ensure legal compliance and we do not believe that is legally compliant. It appears that ECC is proposing to allocate the proposed (but not built) private site at Rivenhall to take output from the Basildon plant. This output is known to be SRF/RDF which ECC legally owns as stated in the operational contract for the Basildon plant. ECC appears to be allocating material it legally owns to a specific private facility without any adherence to their procurement processes and procedures or those associated with the provision of government contracts. This could, clearly, be interpreted as meaning that agreement has been reached between ECC and Gent Fairhead without either the proper planning or procurement procedures being followed. This would be ultra vires the Councils powers and shows a level of pre-determination. ECC is aware that Gent Fairhead, the applicant for the Rivenhall site, has specifically stated in their planning documents submitted to ECC that Rivenhall is the site to which the Basildon specific output can be sent. We believe the plan should be amended to ensure that there is no single allocation made for this specific material. It is waste material that should by law be subject to an open procurement process. Essex County Council has stated that it delayed its final procurement process for SRF/RDF from Basildon for a few years to allow further sites to come on-stream but has nevertheless allocated Rivenhall to take the SRF/RDF from Basildon ahead of that procurement process in the knowledge that only Rivenhall in the plan area and could be used in the stated time horizon. In addition, the inclusion of Rivenhall should now be questioned given that the Environment Agency refused the permit application for the Rivenhall site in December 2016. The refusal was because of the applicants failure to utilise the Best Available Technology (BAT), air quality emissions with predicted emissions more than twice the legal limits and the stack height that is too low for a plant of this size (changes will contravene the Secretary of State planning conditions 2010 ).</p>	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M5?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>Consequently, we believe that ECC is clearly attempting to allocate waste material it owns (SRF Form Basildon) to a plant that has not been built, has no operating licence, will require significant redesign, gas dispersion remodelling, an environmental impact assessment and must go through the planning process again before it is even possible to consider processing waste and this does not appear sensible, never mind legal. Consequently, we require an explanation as to why ECC is allocating a plant (Rivenhall) that has not been built (and is still going through planning) and has no licence for a potential contract to take waste material it (ECC) owns? In addition, the applicants own response to the EA (Fitchner Report in response to second schedule 5 questions from the EA section 2) clearly stated that it the EA permit was refused the plant would not go ahead and given the above allocating waste to the plant is at best irresponsible. Furthermore, and importantly the plan does not consider any alternatives should the Rivenhall plant may not survive the next round of planning or the next EA permit application and as such the plan must be revisited in light of the accreditation problems the Rivenhall plant faces. We also believe that, MAP 5 is incorrect inasmuch as it fails to allocate Rivenhall for "residual non-hazardous waste management" as ECC states it wishes to do.</p>	
1062112, 335	No	<p>Is this change legally compliant, should it not be up to market forces to decide where waste goes? Rather than ECC proposing an unbuilt private site at Rivenhall Airfield? Why are ECC proposing that Rivenhall Airfield should be specifically allocated to take the waste output from Basildon? But ECC owns this waste material by contract. Does this allocation confuse planning and future contracts? Please note that towards the end of 2016 the Environment Agency refused a permit application for the site, so surely there is uncertainty regarding this allocation as the site has not been built and doesn't have and Environment permit or full planning permission.</p>	



Person ID, Organisation, Comment ID	Do you agree with proposed modification M5?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
743809, 454	No	<p>It is not clear whether this is legally compliant. ECC wants to allocate the proposed (but not built) private site at Rivenhall to take output from the ECC Basildon plant. This output is known to be SRF/RDF which ECC legally owns (as stated in the operational contract for the Basildon plant). Therefore ECC appears to be confusing planning and procurement by allocating material it legally owns to a specific privately owned site. ECC is aware that gent Fairhead, ( applicant for the Rivenhall site) has specifically stated in its planning documents submitted to ECC that Rivenhall is the site to which the Basildon specific output can be sent. Amend the plan: ensure that there is no single allocation made for this specific material. Such material should by law be subject to an open procurement process by ECC. ECC has stated that it delayed its final procurement process for SRF/RDF from Basildon for a few years to allow further sites to come on-stream but ECC has nevertheless allocated Rivenhall to take the SRF/RDF from Basildon ahead of that procurement process knowing that only Rivenhall in the plan area could be used in the stated time horizon. Even that assumption should now be questioned please. Note 1: the environment agency refused the permit application for the Rivenhall site (December 2016) because of the failure to demonstrate bat. Note 2: as the site does not have full planning consents nor a licence to operate and though not to be directly considered here, i would call the inspectors attention to the planned short stack. Yet would not current technical knowledge have dictated long ago that a much higher stack would be necessary for such an undertaking? This is also further compounded by the water processing cycle situation. On the part of ECC, it would appear that it is therefore attempting to allocate a private plant (at Rivenhall) that has not yet been built (and is still going through planning). Importantly, ECC has no licence for a potential contract to take waste material it owns. Map 5 fails to allocate Rivenhall for "residual non-hazardous waste management" as ECC states it wishes to do.</p>	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M5?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
1063344, 470	No	<p>This does not seem to be legally compliant as ECC is planning to allocate material from the Basildon plant, which it owns to the proposed Rivenhall facility whereas the allocation of material owned by ECC should be subject to an open procurement process. The plan should be amended to ensure there is no single allocation, for this specific material. Essex county council stated that it postponed its final procurement process for SRF/RDF from Basildon for a several years so that further sites could come into operation yet has allocated Rivenhall to take the SRF/RDF from Basildon ahead of that procurement process in the knowledge that Rivenhall would be the only site in the plan area available in the stated time horizon. Even that assumption should be questioned since the environment agency refused the permit application for the Rivenhall site in December 2016 due to the failure to demonstrate bat. ECC is thus trying to allocate a plant that has not been built (and is still going through planning) and has no licence for a potential contract to take waste material it owns. In addition, map 5 fails to allocate Rivenhall for residual non-hazardous waste management as ECC states it wishes to do.</p>	
746050, Rivenhall Parish Council, 479	No	<p>It is not clear that this change is legally compliant in that the County Council is proposing that the private site proposed at Rivenhall Airfield should be specifically allocated to take the SRF/RDF output from Basildon which ECC owns by contract. Does this allocation confuse the planning regime and future procurement and is that legally compliant? The Parish Council would submit that the matter of where the SRF/RDF goes is for the market via an open procurement process in the normal way. A further uncertainty regarding this allocation is that the Rivenhall plant is not built and does not yet have full planning or an Environmental Permit. In December 2016 the EA refused a permit application for the site due to the failure to demonstrate BAT. ECC has stated an intention to go to the market for a long term contract (or contracts) by 2020 but there is a significant risk that the site would not be available.</p>	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M5?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
988228, 506	No	The Rivenhall IWMF has not been built and does not have an environmental licence so how can it be allocated as the place to take output from the Basildon site? Dealing with this waste owned by ECC should be put out for tender rather than being allocated straight to Gent Fairhead.	Remove Dollymans Farm from the Waste Local Plan as a waste development/land use allocation.
618724, 509	No	It is not clear that this is legally compliant. ECC is proposing to allocate the proposed (but not built) private site at Rivenhall to take the SRF/RDF output from the Basildon plant. This output is waste material which ECC legally owns - as stated in the operational contract for the Basildon plant. Therefore ECC appears to be confusing planning and procurement by allocating material it legally owns to a specific private site. ECC is also aware that gent Fairhead, the applicant for the Rivenhall site has specifically stated in planning documents submitted to ECC that Rivenhall is the site to which the Basildon specific output can be sent. The plan should be amended to ensure that there is no single allocation made for this specific material. It is waste material that should by law be subject to an open procurement process. Essex county council has stated that it delayed its final procurement process for SRF/RDF from Basildon for a few years to allow further sites to come on-stream but has nevertheless allocated Rivenhall to take the SRF/RDF from Basildon ahead of that procurement process knowing that only Rivenhall in the plan area could be used in the stated time horizon. However even that assumption could now be questioned given that the environment agency refused the permit application for the Rivenhall site in December 2016 because of the failure to demonstrate bat. ECC is therefore attempting to allocate its own waste to a plant that has not been built (and is still going through planning) and has no licence, and has delayed its procurement tender process in order in part in the hope that Rivenhall will be built. How is that legally compliant? In addition, map 5 fails to allocate Rivenhall for residual non-hazardous waste management as ECC states it wishes to do.	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M5?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
911132, Cressing Parish Council, 519	No	<p>It is not clear that this is legally compliant. It is proposed to allocate the proposed private site at Rivenhall to take the known SRF/RDF output from the Basildon plant. This output is legally owned by ECC as stated in the operational contract for the Basildon plant. Therefore planning and procurement appears to be confused by allocating material ECC legally owns to a specific site. The applicant for the Rivenhall site has specifically stated in planning documents submitted to ECC that the Basildon output can be sent to the Rivenhall site. The plan should be amended to ensure that there is no single allocation made for this specific material owned by ECC. It is waste material that should by law be subject to an open procurement process. ECC has stated that it delayed its final procurement process for SRF/RDF from Basildon for a few years to allow further sites to come on-board but has nevertheless allocated Rivenhall to take the SRF/RDF from Basildon ahead of that procurement process knowing that only Rivenhall in the plan area could be used in the stated time horizon. However that assumption should now be questioned given that the Environment Agency refused the permit application for the Rivenhall site in December 2016 because of the failure to demonstrate BAT (best available technology). ECC is therefore attempting to allocate a plant that has not been built (and is still going through planning) and has no licence, for a potential contract to take waste material it owns. In addition, map 5 fails to allocate Rivenhall for residual non-hazardous waste management (previously "other waste") as ECC states it wishes to do.</p>	

### Modification M6 – Paragraph 8.10

Person ID, Organisation, Comment ID	Do you agree with proposed modification M6?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
990583, The Churchmanor Estates Co Plc, 18	No	Whilst I can accept most of the proposed amendment to the wording, the incorporation of words <i>seek to</i> introduce a wholly unreasonable ambiguity and uncertainty. Local plan making is a process and it can only be on the adoption of the plan and any reallocation, that there can be defining criteria for the Waste Plan to reallocate an Area of Search.	The plan should therefore be amended to delete the words 'seek to' and incorporate the words 'on adoption' after re-allocate. This has consequential effects on the designation of Areas of Search as defined on the relevant maps.
735401, Basildon Borough Council, 130	Yes	Support the changes to aid clarity on what Areas of Search are and their interrelationship with wider Development Plans.	

### Modification M7 – Policy 4 'Areas of Search'

Person ID, Organisation, Comment ID	Do you agree with proposed modification M7?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
735401, Basildon Borough Council, 131	Yes	Support the changes to aid clarity on what Areas of Search are intended to be for.	

### Modification M8 – Policy 5 ‘Enclosed Waste Facilities on Unallocated Sites or Outside Areas of Search’

Person ID, Organisation, Comment ID	Do you agree with proposed modification M8?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
985065, 45	No	There is one relevant consented plant in the plan area and that is Rivenhall. The heat produced will not be supplied to a district heat network. It would only be used within the plant itself but it is not clear how this could be described as a commercial or industrial user in the sense of having some separation. Furthermore, there is a question over the CHP status of the plant (see mod 19 comments). Following the s73 changes, will heat have to be vented and therefore wasted? If Rivenhall is no longer CHP, the plan descriptions for Rivenhall are not justified.	
983638, 68	No	Rivenhall is the only relevant plant within the plan area, and the heat produced will only be used within the plant, not used within the district network. As previously stated, (re: modification 19) the CHP status of the plant is in doubt. Will the heat have to be vented (therefore, wasted energy)? I do not believe that the plan descriptions for Rivenhall are justified, if this site is no longer CHP.	
1060507, Coggeshall Neighbourhood Plan Committee, 87	No	Rivenhall is the only relevant consented plan in the plan area. The heat produced will not be supplied to a district heat network, but only used within the plant itself. It is unclear how the plant itself could be described as a commercial or industrial user as there is no separation from the plant to commercial or industrial users. In addition, there is a question over the CHP status of the plant (see mod 19 comments). Following the s73 changes, will heat have to be vented and therefore wasted? If Rivenhall is no longer CHP, the plan descriptions for Rivenhall are not justified.	
1061659, 183	No	There is one relevant consented plant in the plan area and that is Rivenhall. The heat produced will not be supplied to a district heat network. It would only be used within the plant itself but it is not clear how this could be described as a commercial or industrial user in the sense of having some separation. Furthermore, there is a question over the CHP status of the plant (see mod 19	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M8?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		comments). Following the s73 changes, will heat have to be vented and therefore wasted? If Rivenhall is no longer CHP, the plan descriptions for Rivenhall are not justified.	
1061682, 200	No	The only one relevant consented plant in the plan area, being Rivenhall. The heat they would produce will be used within the plant and not supplied to the district. It is unclear therefore how this could be described as a commercial or industrial user in the sense of having some separation. There is also question over the CHP status of the plant if you see my comments previously made in MOD 1. Due to the changes in S73 will heat not be vented into the atmosphere and wasted? Therefore if Rivenhall is not going to be CHP the plan description is incorrect.	
1061711, Goslings Granary, 208	No	Policy 5 amongst other elements states "In addition sites should be located at or in : a) employment areas that are existing or allocated in a Local Plan for general industry(B2) and storage and distribution (B8); or b) existing permitted waste management sites or co-located with other waste management development; or c) same site or co-located in close proximity to where Waste arises; or d) the curtilage of a Waste Water Treatment Works; or e) Previously Developed Land; or f) redundant agricultural or forestry buildings and there curtilages." The Rivenhall site when it was first put forward as a site for an IWMF, did not meet any of these locational requirements. It is not located in an employment area. It was not co-located with any other waste management development. It is not co-located in close proximity to where Waste arises, in fact it is 38 miles by road from the Tovi Eco Park Facility and all residual Waste would need to be brought in by road the least acceptable means of waste transport, using the A120 which is acknowledged as being operating at well over capacity. There are proposals being considered for options to upgrade the A120 but there is no guarantee that funding will be available to carry out improvements to the A120. It is not in the curtilage of a Water Treatment Works. It is not on Previously	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M8?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		Developed Land as defined in the NPPF. It is does not use redundant agricultural or forestry buildings or their curtilages. There is therefore considerable scope for a more appropriately located site much closer to the Tovi Eco Park Facility at Basildon to come forward that meets the requirements of Policy 12 Transport and Access of the Plan within the Plan period.	
1059617, 221	No	Policy 5 amongst other elements states "In addition sites should be located at or in : a) employment areas that are existing or allocated in a Local Plan for general industry(B2) and storage and distribution (B8); or b) existing permitted waste management sites or co-located with other waste management development; or c) same site or co-located in close proximity to where Waste arises; or d) the curtilage of a Waste Water Treatment Works; or e) Previously Developed Land; or f) redundant agricultural or forestry buildings and there curtilages." The Rivenhall site didn't and does not meet any of these locational requirements. It is not located in an employment area. It is not co-located in close proximity to where Waste arises, it is 38 miles by road from the Tovi Eco Park Facility and all residual Waste therefore would need to be brought in by road the least acceptable means of waste transport, using the A120 which is already operating at well over capacity. There are proposals being considered for options to upgrade the A120 but there is no guarantee that funding will be available to carry out improvements to the A120. It is not in the curtilage of a Water Treatment Works. It is not Previously Developed Land as stated in the NPPF. It is does not use old agricultural or forestry buildings. There is therefore a requirement for a more appropriately located site significantly closer to the Tovi Eco Park Facility at Basildon to come forward that meet the requirements of Policy 12 Transport and Access of the Plan within the Plan period.	
1059617, 229	No	Proposals for energy recovery facilities with combined heat and power are expected to demonstrate that the heat produced will be supplied to a district heat network or direct to commercial or industrial users. I object to this as Rivenhall will not possibly	



Person ID, Organisation, Comment ID	Do you agree with proposed modification M8?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		technically be a CHP plant with the changes in waste and following the S73 changes heat would be wasted as it is not going to a commercial or industrial user therefore heat would be wasted.	
988283, Bradwell with Pattiswick Parish Council, 237	No	There is one relevant consented plant in the plan area - and that is Rivenhall. The heat produced will not be supplied to a district heat network. It would only be used within the plant itself and so it is not clear how this could be described as a commercial or industrial user in the sense of having some separation. Furthermore, there is a question over the CHP status of the plant (see mod 19 comments). Following the s73 changes, will heat have to be vented and therefore wasted? If Rivenhall is no longer CHP, the plan descriptions for Rivenhall are not justified.	
1062089, Coggeshall Parish Council, 330	No	There is only one relevant consented plant in the plan area and that is Rivenhall. The heat produced will not be supplied to a district heat network and the revised proportions of the plant indicate a significant proportion of the heat is wasted to atmosphere. Originally it (the heat) would only be used within the plant itself but it is not clear how this could be described as a commercial or industrial user in the sense of having some separation. Furthermore, there is a question over the CHP status of the plant (see mod 19 comments). Following the s73 changes (Feb 2016), since there is no facility to recover the additional heat within the application we believe will heat be vented and therefore wasted and that Rivenhall is no longer CHP, the plan descriptions for Rivenhall are not justified.	
743809, 467	No	There is one relevant consented plant in the plan area: Rivenhall. The heat produced will not be supplied to a district heat network. It would only be used within the plant itself but it is not clear how this could be described as a commercial or industrial user in the sense of having some separation. There is a question mark over the CHP status of the plant (see mod 19 comments). Following the s73 changes, will heat have to be vented and therefore wasted? Is this acceptable/appropriate to the	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M8?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		inspector? If Rivenhall is no longer CHP, the plan descriptions for Rivenhall are not justified.	
1063344, 475	No	There is one relevant consented plant in the plan area and that is Rivenhall. The heat produced will not be supplied to a district heat network. It would only be used within the plant itself but it is not clear how this could be described as a commercial or industrial user in the sense of having some separation. Furthermore, there is a question over the CHP status of the plant (see mod 19 comments). Following the s73 changes, will heat have to be vented and therefore wasted? If Rivenhall is no longer CHP, the plan descriptions for Rivenhall are not justified.	
618724, 514	No	There is one relevant consented plant in the plan area and that is Rivenhall. The heat produced will not be supplied to a district heat network. It would only be used within the plant itself but it is not clear how this could be described as a commercial or industrial user in the sense of having some separation. Furthermore, there is a question over the CHP status of the plant (see mod 19 comments). Following the s73 changes, will heat have to be vented and therefore wasted? If Rivenhall is no longer CHP, the plan descriptions for Rivenhall are not justified.	
911132, Cressing Parish Council, 524	No	Rivenhall is the only relevant consented plant in the plan area. The heat produced will not be supplied to a district heat network. It would only be used within the plant itself and so it is not clear how this could be described as a commercial or industrial user in the sense of having some separation. Furthermore, there is a question over the CHP status of the plant (see mod 19 comments). Following the S73 changes, will heat have to be vented and therefore wasted? If Rivenhall is no longer CHP, the plan descriptions for Rivenhall are not justified.	

### Modification M9 – Policy 6 ‘Open Waste Facilities on Unallocated Sites or Outside Areas of Search’

No Comments Received.

### Modification M10 – Policy 7 ‘Radioactive Waste Management at Bradwell-on-Sea’

Person ID, Organisation, Comment ID	Do you agree with proposed modification M10?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
1062191, Nuclear Decommissioning Authority and Magnox Limited, 350	Yes	The NDA and Magnox Limited would like to confirm their support for the following modifications, which are consistent with the representations made by GVA (on behalf of the NDA and Magnox Limited) to the consultation on the Pre-Submission Draft of the RWLP: Main Modification 10 the modification to Policy 7. Minor Modification 27 the modification to paragraph 4.11. Minor Modification 35 the modification to paragraph 6.6. Minor modification 40 the modification to paragraph 8.32. While the NDA and Magnox welcome the abovementioned modifications to the RWLP, they maintain their view that further minor modifications are still required for the Plan to be considered sound. While the NDA and Magnox welcome the abovementioned modifications to the RWLP, they maintain their view that further minor modifications are still required for the Plan to be considered sound.	

### Modification M11 – Policy 9 ‘Waste Disposal Facilities on Unallocated Sites’

No Comments Received

### Modification M12 – Paragraph 9.33

Person ID, Organisation, Comment ID	Do you agree with proposed modification M12?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
735401, Basildon Borough Council, 132	Yes	Support the changes to make the plan more positive in respect of this issue.	
1063440, Natural England, 494	Yes	We support the modification "Restoration schemes should, in the first instance, be seen as an opportunity to enhance and to upgrade PROW where possible, ... in all cases, restoration schemes should provide for access which is at least as good as that existing before the workings began."	

### Modification M13 – Policy 10 ‘Development Management Criteria’

Person ID, Organisation, Comment ID	Do you agree with proposed modification M13?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
735401, Basildon Borough Council, 133	Yes	Support the changes to make the plan more positive in respect of this issue.	n/a
1063440, Natural England, 497	No	The additional detail provided around Clause b (protection of water resources) is welcomed; however we recommend a slight change of wording.	<p>We recommend making the clear distinction between water quality and water quantity; the current additional text is unclear. We advise amending the text from:</p> <p>b. the quality of water within water bodies, with particular regard to:</p> <ul style="list-style-type: none"> <li>- preventing the deterioration of their existing status; or</li> <li>- -failure to achieve the objective of good status, and</li> <li>- -the quantity of water for resource purposes within water bodies.</li> </ul> <p>To the following:</p> <p>b. water resources, with particular regard to:</p> <ul style="list-style-type: none"> <li>- -the quality of water within water bodies: <ul style="list-style-type: none"> <li>o preventing the deterioration of their existing status; or</li> <li>o -failure to achieve the objective of good status, and</li> </ul> </li> </ul>

Person ID, Organisation, Comment ID	Do you agree with proposed modification M13?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
			- the quantity of water for resource purposes within water bodies
1064243, Historic England, 527	Yes	We are pleased to note the inclusion of a requirement for the enhancement of the natural, historic and built environment	n/a

#### Modification M14 – Policy 12 ‘Transport and Access’

Person ID, Organisation, Comment ID	Do you agree with proposed modification M14?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
1064243, Historic England, 528	No	We note that waste management developments will be permitted to use existing road connections, subject to a hierarchy of alternative options and an assessment of impact to various considerations. One of these considerations is a proximity to sensitive receptors. Whilst we are supportive of including consideration of the historic environment, we reiterate that proximity alone is not an adequate assessment when the sensitive receptor is an element of the historic environment such as a heritage asset. Impact to significance can occur at some considerable distance when referring to landscape character for example. Conversely, development may occur in close proximity to a listed building where there is no loss of significance to it or to its setting. .	We request that the policy considers the significance rather than the proximity of sensitive receptors as follows: Where access to the main road network in accordance with (b) and (c) above is not feasible, road access via a suitable existing road prior to gaining access onto the main road network will exceptionally be permitted, having regard to the scale of the development, the proximity of sensitive receptors, <i>the significance of the historic environment</i> , the capacity of the road and an assessment of the impact on road safety

### Modification M15 – Bellhouse Landfill Site

No comments received

### Modification M16 – Little Bullocks and Crumps Farm, Great and Little Canfield

Person ID, Organisation, Comment ID	Do you agree with proposed modification M16?	Brief explanation of why you agree/disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
1061953, Great Canfield Parish Council, 283	No	<p>a) Deletion of the condition that Waste shall be restricted to stable non-reactive hazardous waste. No liquids, slurries, clinical wastes, or oils shall be deposited on site. The condition was included to (partially) protect the local community and to delete it, on a technicality, at this late stage, is unacceptable.</p> <p>b). The change of the life of the site to 15 years, with availability upon adoption of the RWLP. We have already brought to the attention of the Planning Team and the Planning Inspector, that the very small amount of minerals on this site (approx. 2ft in depth) which is located approx. 9 metres below the surface means that this site can never be excavated. It is not financially viable as a minerals site and to dig a hole, simply to fill it with waste, is not lawful. Therefore to suggest that this site can commence taking waste upon adoption of the RWLP and can continue to do so for 15 years is simply not true.</p>	<p>a). This condition should be reinstated. We have already pointed out, on numerous occasions, that this site is very close to a significant number of residential properties. As is pointed out in Modification 41 that impacts on amenity can cover a range of potential pollution and disturbance from, for example, light, noise, dust, and odour as well as concerns for the possible effects on human health from the development. To even consider dumping such waste as this is ludicrous. Making fundamental changes to the plan at this late stage should not be allowed. The applicant has had plenty of time to submit details that are deliverable and effective. The introduction to this document restricted comments to those that were deemed necessary to make the plan sound/ legally compliant and appropriate for adoption. These modifications have not been discussed in detail during the hearing sessions as stated in the introduction. We made comments that were in-line with the rules (to make the plan sound/legally compliant and appropriate for adoption) which have been totally ignored. The comments made by the applicant, and included in the modifications give the applicant more freedom and have been added to the plan without any discussion. We feel the RWLP consultation process is totally one-sided.</p> <p>b). It needs to be accepted that this site cannot be</p>

Person ID, Organisation, Comment ID	Do you agree with proposed modification M16?	Brief explanation of why you agree/disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
			included in the plan as permission to excavate can never be given, as to do so would be unlawful
1736, Takeley Parish Council, 459	No	<p>Takeley Parish Council (TPC) PC is disappointed to learn that Essex will still be importing London waste as the majority comes to this part of Essex should not import London waste if it is unable to facilitate the waste produced in this county. Please ensure that all planning permissions and terms of site operation reiterate the use of the major trunk routes e.g. M11 &amp; A120 and not A &amp; B class roads e.g. B1256 TPC opposes any development at Start Hill. This is not a suitable/sustainable consideration given the pressure and over-capacity at M11 Jtn 8 Regarding the development of 3 sites at Little Bullocks &amp; Crumps Farm TPC maintains its OBJECTION:</p> <ul style="list-style-type: none"> <li>- TPC concurs with ECC's originally assessment which discounted these allocations. The Minerals Local Plan was approved by the Secretary of State and adopted by ECC as recently as 2014. This Plan included a condition that extraction of minerals from sites A22 and A23 could not commence until the main Crump's Farm site was fully restored - which is not expected until around 2030. Why are ECC planners now saying that they can overrule that condition?</li> <li>- Some of the environmental consequences of these allocations have now either been ignored or understated.</li> <li>- The amount of minerals expected to be extracted from site A23 is very small, and we say, too shallow to allow the safe dumping of hazardous waste. Policy 13 clearly states that 'land raising that is considered to constitute a waste disposal activity, for its own sake, will not be permitted' so burying the waste by covering with other materials is not an option.</li> <li>- The RWLP fails to consider the impact on potential housing development at Priors Green (Takeley/Lt. Canfield)</li> </ul>	



Person ID, Organisation, Comment ID	Do you agree with proposed modification M16?	Brief explanation of why you agree/disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>- UDC Local Plan - potential for 1750 new homes and a primary school (north of B1256 opposite the above sites). There is no mention of housing development currently under construction adjacent to the site at Runnels Hay and the impact on this site. It is proposed to allocate hazardous waste to Site 2 which is adjacent to Runnels Hey.</p> <p>TPC is very concerned about the environmental impact on the River Roding and Runnels Hay Bluebell Wood (ancient woodland). The RWLP underestimates the risk of leeching and the impact on water quality.</p> <p>- There is surely a real danger of 'bird strikes' (proximity to Stansted Airport)</p> <p>- The additional HGV traffic generated by these sites would add to the already intolerable volume of HGV traffic through Takeley and along the B1256 (Elsenham site currently has permission for 400 vehicle movements per day). The noise and vibration negatively impacts on the wellbeing of our residents and destroys the local road network.</p> <p>- For the reasons stated above TPC objects to any additional HGV traffic through Takeley. There is a Vehicle Routing Agreement should be imposed.</p>	
784822, Hatfield Broad Oak Parish Council, 461	No	Deletion of the condition that Waste shall be restricted to stable non-reactive hazardous waste. No liquids, slurries, clinical wastes, or oils shall be deposited on site. The condition was included to protect the local community and to delete it in a modification is unacceptable. The change of the life of the site to 15 years, with availability upon adoption of the RWLP. Great Canfield PC have already brought to the attention of the Planning Team and the Planning Inspector, that the very small amount of minerals expected to be extracted from this site is too small and shallow. The site is not financially viable as a minerals site.	This condition should be reinstated. We agree that as Great Canfield and Takeley PCs have already pointed out, on numerous occasions, this site is very close to a significant number of residential properties. The additional HGV traffic generated by proposed extra development at these sites would add to the already extensive volume of HGV traffic via the B1256 through Hatfield Broad Oak and along the B183. The noise and vibration from 5.30 am especially in the village affects properties and negatively impacts on the wellbeing of

Person ID, Organisation, Comment ID	Do you agree with proposed modification M16?	Brief explanation of why you agree/disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
			<p>our residents, destroying the local road network. Footpaths are narrow and HGV traffic, often travelling at unsuitable speeds, in places pass within 2 metres of pedestrians. The possible addition of HGVs carrying hazardous waste on this narrow B road is a cause for extreme concern and should not be permitted. Planning permissions and conditions of any site operations must contain Vehicle Routeing Agreements to ensure that the major trunk routes i.e. e the M11 and A120 are used, not B183 and B1256. The construction of M11 Junction 7a can only make the present situation worse.</p>

### Modification M17 – Morses Lane, Brightlingsea

Person ID, Organisation, Comment ID	Do you agree with proposed modification M17?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
1059754, 53	No	<p>If I am correct it seems that a red warning has been given because of close proximity to the proposed site of a large residential area. An amber warning for a very large college in the immediate area of the site. The solution seems to be to take the operation under cover. I would consider such a work environment would lead to a great deal of dust within the building which would have to be extracted for the health and safety of the staff. How will this hazard be dealt with bearing in mind the local population and the school location? There is no mention that I can see that the road infrastructure has been taken into account not only for Brightlingsea but all the surrounding villages, when there is the A120 capable of handling this sort of traffic and without disturbing</p>	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M17?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		any housing. What will happen if the new "garden towns" are built in the vicinity which will bring more and more traffic onto the B roads system?	
990357, East of England Co-operative Society, 71	No	<p>The Society maintains an in principle objection to the proposed inert waste recycling facility at Morses Lane, Brightlingsea. However these representations respond specifically to the proposed modifications to the allocation, in the context of the current consultation on post examination modifications. Main Modification 17 - Table 14 Morses Lane, Brightlingsea to strengthen the intended protection of amenity, particularly for proximal land uses. However whilst the justification text appears to recognise the proximity of the allocated site to several sensitive receptors, including its location immediately adjacent to a retail store and the nearby school, this is not adequately reflected in the suggested amendments to the text. There is very little information provided on how the Council derived the suggested bullet points and why other requirements suggested previously by the Society were not included. As highlighted previously through the Examination Hearings and letter dated 14th October 2016, should the allocation proceed there are a number of absolute minimum requirements of measures that should be incorporated within the Development principles for the site. It is considered that the proposed amendments do not go far enough, as set out below in more detail. Proposed Modifications: Morses Lane Site Assessment Scores It is noted that the Council suggested modifications to the Morses Lane Site Assessment Scores "to</p>	<p>Proposed Amendment - insertion of bullet point: "The inclusion of a statement that the facilities will be enclosed" The modification seeks to insert the following text to bullet point 5: it is expected that operations would be enclosed within an appropriate building. This is considered too ambiguous. The modification does not provide sufficient detail for the requirement to be deemed effective and it does not offer satisfactory assurance that neighbouring uses will be protected in terms of amenity. As such, it fails to meet the tests of soundness as set out in Paragraph 182 of the NPPF. The need to specify the enclosure of the facility was highlighted as a necessary requirement at the Examination Hearing session, however, to ensure this is effective and the requirements are clear, the Society considers that the aforementioned text should be amended to specify the following: The following mitigation measures will be established in the interests of protecting local amenity: All crushing, processing or other physical handling of inert waste, including all transfer of waste between vehicles to be enclosed within suitably designed and located building(s); The storage of waste or recovered materials should also be</p>

Person ID, Organisation, Comment ID	Do you agree with proposed modification M17?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>accommodate information raised at the Hearings. In particular it amends 3D proximity to Sensitive Receptors and 3K Recreation Facilities to Amber 2. These modifications are particularly referred to within the Site Assessment and Selection Report Addendum: Rationale for Preferred Allocations (January 2017). It states that during the hearing sessions a number of elements in the site assessment proforma were inaccurate. However it then states Although updating these inaccuracies would not result in the exclusion of the site; the Authorities consider it prudent to maintain an accurate evidence base as it may be helpful to the future planning application process. However there is no discussion of the inaccuracies identified and the reasons why it does not alter the inclusion of the site. Similarly, in the Schedule of Modifications Sustainability Appraisal and Strategic Environmental Assessment Addendum November 2016) for the modifications it simply states " There will be no significant sustainability effects, or changes to the SA as a result of this modification. There is no discussion how this conclusion is reached. Given the inaccuracies identified, it is considered that further justification is required to justify the modifications, and the reasoning why the additional measures suggested by the Society were not incorporated. Summary The Society remains concerned, that despite inaccuracies and shortcomings identified in relation to this allocation at the Examination Hearing, the proposed modifications fall significantly short in ensuring that the site allocation would not result in demonstrable harm and an unacceptable impact on the surrounding area, in particular to the</p>	<p>fully contained within buildings, with no external storage permissible; All vehicles carrying inert waste should have such waste fully covered, whether arriving at or leaving the site, to avoid dust entering the atmosphere on the approaches to and from the facility; The buildings should include the incorporation and maintenance of effective dust extraction technologies, to prevent the escape of dust from the process and the premises with a specific and particular emphasis on silicates; and Limits on duration (hours of operation) and noise standards (from noise sensitive properties) (as per existing text in table 14). Proposed Amendment: "Additional Bullet Point regarding the need for new development not to impact on the nearby retail use" The second amendment to table 14 seeks to insert the following text to bullet point 6: The configuration and operation of the proposed facility shall have regard to impacts on neighbouring land uses, including the potential impacts on the adjacent retail use. The impact on the retail use is of great concern to the Society and this additional bullet point again provides very little information or clarity on how the Council would seek to ensure this is enforced. It should be more specific as to the requirements sought. In addition to the facility being fully enclosed as set out above, the following points are also considered necessary in relation to the impacts on the neighbouring retail use: The specification of buildings</p>

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		existing East of England Co-operative retail store.	and operations are to include noise mitigation materials and measures, having regard to appropriate maximum standards at the boundary of the site; The design of any buildings to have regard to the landscape setting of the site, and its location on the fringe of the settlement; The siting of any buildings and processes on the site should have particular regard to safeguarding the health, safety and amenity of customers and staff at the immediately adjacent retail store, including the avoidance of unacceptable impacts on the rear servicing arrangements for the store, which includes the transfer of food products; The installation and maintenance of additional soft landscaping measures such as an enlarged earth bund, in addition to substantial tree planting (already specified in the submitted Plan), having regard to the effective mitigation of noise, dust and landscape and visual impacts; Sufficient vehicle parking and traffic management measures to be provided on site, including delivery reception and arrival management protocols, in order to prevent vehicles stacking and parking in Morses Lane (potentially including the identification of an off-site location for the stacking of vehicles away from the settlement and other sensitive receptors); This should be reinforced by the introduction of effective and enforceable parking restrictions on Morses Lane, to ensure that access to the rear servicing and staff parking areas at the

Person ID, Organisation, Comment ID	Do you agree with proposed modification M17?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
			adjacent retail store are kept clear at all times.
922607, 73	No	I wish to object to your findings. You don't seem to have taken into consideration that this building is only a matter of a few metres from living accommodation. Have you never wondered why no crushers in the country have been put into buildings? It is a known fact that this generates more noise and you still don't seem to have taken any notice of the traffic congestion this will cause. On Monday 30 January we had an action day by the police in Brightlingsea, within a few hours (starting at 9.30/9.45am) their AMPR had clocked over 1800 traffic movements coming in and going out of Brightlingsea, with several of these being large lorries, all were tested for red diesel. This was a normal day and not in rush hour, how much more can our road take? Brightlingsea is not suitable and never will be.	
1060859, 105	No	You have commented on the closeness to residential, school, supermarket etc. but you still seem determined to build this waste site. How many more comments do you need before you take notices that our roads cannot take any more traffic? Stop telling us what we need, and how good a site it is, which it is not. Please listen to us, too close to properties, putting under cover does not help traffic situations, our roads cannot take it.	
911198, 110	No	There still seems to be a total disregard for the amount of vehicle movements to service this site, from previous approximate calculations based on a 5 day working week excluding overnight working this would add 28 movements per day to an already busy	The only change I can suggest would be to not pursue this development on this totally unsuitable site and use other existing recycling installations along the A120 corridor at Ardleigh which have better road access and

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		<p>road from the existing site. A recent event by Essex Police and DVLA recorded in excess of 1,000 vehicle movements on the B1029 within a few hours which did not include rush hour. There is a suggestion that the plant would be enclosed to reduce the sound but no evidence of similar sites is mentioned where enclosure would reduce the noise pollution to the surrounding area. Given human nature and depending on the construction of the enclosure it is probable that in hot weather the doors would be left open for the comfort of the operatives. It has been discovered that there may be an archaeological site nearby and excavations should take place but there is no detail as to when that will take place and by whom. You should not need reminding that there is a supermarket adjacent to the proposed site and a school within 200 yards.</p>	<p>is away from retail and residential properties.</p>
1060938, 115	No	<p>1. The impact of increased heavy goods vehicles on the roads leading to the site, there is a supermarket immediately next to the site, there is a school immediately opposite the site, and there are residential properties immediately next to the site. All of which have pedestrians going to and from the supermarket creating an increased risk of harm to individuals. 2. Increased incoming and outgoing vehicles, the roads cannot take increase in usage, as the church corner is already a high risk accident spot and this will increase the chances of further incidents. 3. Noise levels to the surrounding area, there are young families and old families in the immediate vicinity of the proposed plant, having worked within this industry the noise levels will be intolerable especially at weekends. 4. The vibrations caused will cause local properties to shudder</p>	<p>you have a perfectly good abandoned site in St Osyth (the old waste site) where this can be built without any impact on residents, schools, supermarkets and is on a main road which can handle the increase in traffic.</p>

Person ID, Organisation, Comment ID	Do you agree with proposed modification M17?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>and have an increased risk of cracking on properties. 5. The dust levels will increase especially in the summer and cause windows, cars, caravans as well as health issues to people with asthma and other breathing issues. 6. Debris on road will be inevitable due to type of waste being bought in and spillages from lorries. 7. The smell will be intoxicating and create health risks to the surrounding residents and school. 8. The school will be disrupted through all of the above. 9. The supermarket will probably have a down turn in trade due to the locations and disruption that will be caused, as people will not be confident to shop there due to increased vehicles, noise, dust and vibration. 10. There will be a huge impact on the environment, due to the noise, dust, vibration, making birds, badgers, rabbits as well as other animal's habitats unsafe. 11. This proposal is totally unacceptable in that location, you need to think about all of the above not, Brightlingsea does not want this what so ever,</p>	
1060942, 116	No	<p>The Site in Brightlingsea is not a practical solution; the local road cannot support the extra traffic that this site would produce. The proposed site is bordering a local school and residential area and the noise and dust to the local area would cause health issues. The running of the site will cause detrimental impacts on the local residents from noise to vibrations to dust and foul smells. A site along the A120 surrounded by nothing other than fields and a dual carriageway would have surely been the better option!</p>	



Person ID, Organisation, Comment ID	Do you agree with proposed modification M17?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
1061041, 117	No	<p>The main Brightlingsea Road is not safe for increased HGV use. The corner at the church is especially dangerous and is a known accident black spot! It is extremely disconcerting for drivers, especially our elderly, to meet large HGVs on our winding road at this present time. More lorries would be a disaster to this community and could even lead to fatal accidents. Our residents living along the Brightlingsea Road and on the smaller residential road leading to the proposed area will be subject to damaging vibration, extra noise and dust caused by passing lorries. The proposed site is close to the Co-op, the local school, whose students frequently visit the co-op, and local residents whose lives will be immeasurably blighted if this is permitted.</p>	Brightlingsea is not a suitable site.
1060955, 120	No	<p>The main Brightlingsea Road (Church Road) is already filled with heavy traffic if a major incident occurred there is no way of ambulances etc. getting to the town if the proposal is agreed. Dust would pollute the food in the only local large supermarket which would dissuade people from using the store. Dust would also contaminate local crops and cattle/sheep. There is a school nearby which would also be affected. Local people with lung conditions would have nowhere to hide from the pollution other than indoors which in the summer months can be unbearable in the heat. Excess traffic would cause fatalities as the road is already a hazard to cross let alone heavy vehicles which take even longer to stop. We get a high number of vehicles in the summer months with holiday makers. The noise would be awful for local residents. There are farms very close to the area also which will be polluted. This application was refused previously</p>	<p>I propose the application be refused and another area closer to the A12/A127 be found there is plenty of open land in the vicinity of those areas which would not cause any distress to local residents or wildlife. Heavy goods vehicles would be able to move freely on these roads whereas at the moment the B1027 would suffer with too many HGV's.</p>

Person ID, Organisation, Comment ID	Do you agree with proposed modification M17?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>because of the conditions I have mentioned yet for some reason people are choosing to ignore the previous rejection of the application. We chose to live in this area because of the peace and quiet. There is a nature reserve nearby which could also be affected by the plans. The smell from the waste site could also cause problems. Many people will see the price of their property plummet if this goes ahead. We would need CCTV to be installed if this were to go ahead to monitor traffic and make sure everything is being run as agreed.</p>	
1061128, 121	No	<p>The main Brightlingsea Road is already filled with heavy traffic if a major incident occurred there is no way of ambulances etc. getting to the town if the proposal is agreed. Dust would pollute the air and the food in the only local large supermarket which would dissuade people from using the store and the petrol station. There would be loss of employment due to this. Dust would also contaminate local crops and cattle/sheep. There is a school nearby where lots of children attend they would also be affected. Local people with lung conditions would have nowhere to hide from the pollution. The only doctors we have at present are under constant stress due to the population in the area if more people became sick due to this how would they cope? Excess traffic would cause fatalities as the road is already a hazard to cross let alone heavy vehicles which take even longer to stop. We get a high number of vehicles in the summer months with holiday makers. The noise would be awful for local residents. There are farms very close to the area also which will be polluted. This application was refused previously because of the conditions I</p>	<p>I propose the application be refused and another area closer to the A12/A127 and A120 be found there is plenty of open land in the vicinity of those areas which would not cause any distress to local residents or wildlife. Heavy goods vehicles would be able to move freely on these roads whereas at the moment the B1027 would suffer with too many HGV's. To refuse the application is the only course of action which should be taken.</p>

Person ID, Organisation, Comment ID	Do you agree with proposed modification M17?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>have mentioned. There was a previous application rejected. We chose to live in this area because of the peace and quiet. There is a nature reserve nearby which could also be affected by the plans. The smell from the waste site could also cause problems. Many people will see the price of their property plummet if this goes ahead. More road repairs would be needed because of the type of traffic which would be using the road more often i.e. HGV's. Any road repairs on Church Road are a headache let alone the need being more often. We would need CCTV to be installed if this were to go ahead to monitor traffic and make sure everything is being run as agreed.</p>	
1061124, 122	No	<p>We disagree because the site in Morses Lane can only be accessed via the main Brightlingsea Road which is narrow and has a number of bends, twists and turns. It already suffers from excessive traffic, in particular large container lorries and skips lorries going to the same site for EWD as well as Brett lorries going to the quarry. In addition there is the regular traffic and an increasing residential population who need to gain access to and from the town centre, all via the same single lane one narrow road. The fumes and dust are already unacceptable and to add to this, quite frankly beggars belief. The site is unsuitable; it isn't even suited for the current activity that has to be suffered. When we complain to EWD about the inevitable percentage of waste that is seen falling from their vehicles, they respond with a patronising apology and the proverbial shift of blame to the drivers sole responsibility under their 'Duty Of Care.' If this site on 'green belt' is permitted it will be an insult to our community and our so</p>	<p>There are no adaptations that could be made, it is a wholly inappropriate area to consider implementing such a large waste site. Apart from Brightlingsea having significant historic significance as well as large areas of Special Scientific Interest, it is much too close to the Residential Community who live here, The Colne Secondary School and College, The large Coop Supermarket and many Businesses . Dust and air born pollutants are carried on the wind and will have long term effects on the health on our communities for future generations. This site should be developed somewhere else where there is better access and away from local residents, schools, sports centres and supermarkets. A12 A120 etc.</p>

Person ID, Organisation, Comment ID	Do you agree with proposed modification M17?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		called democracy. Assessments are coded RED	
1060927, 123	No	The proposed location for the waste disposal site is not sensible due to the following reasons: 1) very close proximity to a major food retail outlet I.e. The coop with the consequent dangers of food contamination; 2) very close proximity to Colne School and the potential for particulate contamination of the air and the potential for Health and safety issues to its students due to an increase in road traffic; 3) the unsuitability of the current road infrastructure to accommodate the planned increase in road traffic (i.e., Church Road being the only road in and out of Brightlingsea); 4) the very close proximity to residential properties and the potential for Health and safety, odour and noise issues; 5) there would appear to be far more accommodating and sensible sites else where such as the Veolia site on A120 site, which has excellent road links and none of the disadvantages in point 1 to 4 above;	Move the proposed waste disposal site to a more suitable site away from residential, school and retail areas E.g., the Veolia site on the A120.
1061223, 124	No	The proposed location for the waste disposal site is not sensible due to the following reasons: 1) very close proximity to a major food retail outlet I.e. The coop with the consequent dangers of food contamination; 2) very close proximity to Colne School and the potential for particulate contamination of the air and the potential for Health and safety issues to its students due to an increase in road traffic; 3) the unsuitability of the current road infrastructure to accommodate the planned increase in road traffic (i.e., Church Road being the only road in and out of Brightlingsea; 4) the very close proximity to residential properties and the	Move the proposed waste disposal site to a more suitable site away from residential, school and retail areas E.g., the Veolia site on the A120.

Person ID, Organisation, Comment ID	Do you agree with proposed modification M17?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		potential for Health and safety, odour and noise issues; 5) there would appear to be far more accommodating and sensible sites else where such as the Veolia site on A120 site, which has excellent road links and none of the disadvantages in point 1 to 4 above;	
1061530, 147	No	The access roads to this site are through villages and therefore the increase in heavy traffic is going to have a very detrimental effect on the people who live in these villages. More importantly, there is only one access road to Brightlingsea and at present this road is already struggling with the traffic heading in and out of the area. The modification will be far too close to The Colne Community School and College, homes and supermarket. Despite improvements in how waste is dealt with, there are still too many unknowns of the effects, particularly on young people.	The waste disposal needs to be on a site with better access, for example dual carriageways, and not near any schools, homes or businesses.
1061671, 187	No	We have received our local newspaper which h details the above. I feel that I need to add my voice of concern with regards access to Brightlingsea. As you are aware there is only one road into and out of the town and this is obviously in constant use. I see that you say that a traffic survey was completed. Perhaps you can furnish me with when this happened as there have been further houses built and the increase in the secondary school and primary school which means more people are using the road into the town. The road is of poor repair anyway due to its heavy use and with increased traffic it can only get worse. The structure of the roads with large trees on each side by a sharp bend could lead to potential accidents with lorries turning around the bend. Can I also	

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		voice my concern with regards pollutants from the site as well? I am aware that you propose to use a building to contain it, but let's hope that works. Anyway I hope you find time to consider my concerns.	
291406, Brightlingsea Town Council, 211	No	Brightlingsea Town Council maintains its objection to this proposal. The Planning Committee of the Council have considered the two modifications to Appendix 15 Table 14, Morses Lane, Brightlingsea. The first modification states It is expected that operations would be enclosed within an appropriate building. This statement is too weak and the words It is expected that should be deleted. The second modification states the configuration and operation of the proposed facility shall have regard to impacts on neighbouring land uses, including the potential impacts on the adjacent retail use. The Council welcomes and supports this modification.	
1061722, 215	No	Firstly as a new resident in Brightlingsea I must record my objection to the proposed allocation of land in Morses Lane for the proposed use given that it will involve large numbers of heavy goods vehicles visiting daily allied to the noise and further air pollution from this proposed use. In my opinion access is completely unsuitable due to the already heavily overloaded single access road B1029 into the town. Realistically this should preclude any such development until improved or alternative access into Brightlingsea is provided. The subject site is also close to a Co-operative Society Supermarket, a Large Secondary School and its Playing Fields together with residential property	First modification - see above. Second modification- As a result of carefully assessing the expected impact it will surely be clearly shown that the subject site is unsuitable for the proposed use. My opinions/reasons for this are set out above.

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		<p>many of which are occupied by elderly persons. My observations on the modifications are: - 1st modification - not accepted. The text is far too loose and imprecise. The words "expected that.....appropriate building." should be revised to provide a clear and unambiguous definition of intent. 2nd modification - Reasonable but please see below for my observations.</p>	
922234, 240	No	<p>I am in disbelief that you are still continuing to think that Morses Lane Brightlingsea is the perfect site for a concrete recycling plant. I have lived in Samson's Road with my husband and young son for the last 6 years, our house backs onto Morses Lane Industrial site. Over the last three years i have noticed a significant rise in the level of noise, dirt and traffic pollution which affects my home and my health as I am a chronic asthmatic. "Eastern Waste Disposal" (EWD) who occupy part of Morses Lane, is a vast recycling operation, who have been over the last few years overly expanding to the point of outgrowing the site. Operations start at 5.30am and finish, up to 8.00pm. This means more heavy trucks using Samsons Road, houses are close to the road and residents already feel vibrations from the lorries, diesel pollution which is so harmful to us and the environment. The road surface is in a poor state and is covered permanently in thick dirt, homes and cars are constantly covered in dust. Many days I am unable to have the windows open due to dust and disgusting smells. The proposed site is totally unsuitable for Brightlingsea, this is a small town and has no through road to any other destination. The B1029 is narrow, winding and totally unsafe for the amount of traffic already using it. EWD skip lorries, massive recycling lorries, earth moving</p>	<p>I believe there is a site already being used for the disposal of waste off the A120, this is a far more suitable and convenient site for further development.</p>

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		<p>lorries from the sandpit. It's not an A road and the weight and size of heavy vehicles have flatten the verge sides by at least an extra 2ft each side, lives will be lost if this road is abused further. Samsons Road is NOT the place to build a concrete recycling plant. My house is less than 200 metres away from the proposed site, and this will affect considerably the value of my property. Other homes are closer. The site is less than 100 meters from the secondary school boundary with 1200 students. The site is less than 50 metres away from a Fiveways food store. This road is residential and has been since the 1930's, just because there is an empty field does not mean it is suitable for more industry. I have witnessed a concrete crusher at work and it's the most horrific ear deafening sound imaginable. This is not going to be silenced enough by putting a building around it. What happens when the weather gets hot? The doors will be opened and the noise will then not be contained. This already happens with other industrial units at Morses Lane, even though they too are supposed to keep their doors shut at all times. Residents of Samsons Road don't want :- LORRY TRAFFIC DIRT SMELLS NOISE POLLUTION More heavy Industry will damage this town</p>	
1061893, 258	No	<p>Having read all of the other comments I could just say that I agree with them all. The road into Brightlingsea is not suitable for even more traffic that it has at the moment. In the event of an incident or accident, however small, the road can be blocked for some time. The addition of more heavy traffic vehicles can only to the risk of more incidents and accidents. The site is too close to retail outlets</p>	<p>Position the new facility away from existing residential and retail properties and somewhere more suitable to traffic access.</p>



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		<p>and a school. There are residential properties nearby too and for them it would be a nightmare. The industrial estate appears to have grown in recent years which are good for business in Brightlingsea but it should be kept to less intrusive, smaller businesses. We already have waste plants at both ends of Brightlingsea - this should be the perfect reason to disagree with this proposal. The effect on Brightlingsea is enormous and possibly damaging to the health and wellbeing of its residents. It is not clear what the details are for the operation of the site. I have no personal knowledge of how the planning process works but I am told that the details are managed after the approval is given. If this is the case then it is unacceptable to foist something with such a huge potentially damaging effect onto a small town.</p>	
1061912, 264	No	<p>i strongly disagree that the amount of extra vehicles and pollution levels are going to be acceptable in a rural area immediately adjacent to a food facility and school along with housing along main route</p>	<p>my considered opinion is that this will never be an appropriate site to house a new waste plant.. Considering the amount of green belt being approved for housing, surely an area closer to a dual carriageway clear from any built up residential areas would be a better proposal. My personal objection also comes from the fact that i will have to deal with the amount of pollution and traffic on a daily basis as i live in the immediate vicinity.</p>
1061927, 275	No	<p>Due to the extreme decline in bird populations in the UK, this development has the potential to impact on the valuable habitat found in this Special Protected Area for breeding bird species and winter gatherings of wildfowl. The potential impact could be in air</p>	<p>It does not seem possible for the plant to go ahead without impacting on these areas even with the modifications</p>

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		<p>pollutants, water runoff, exhaust fumes, coastal squeeze and disturbance. Any assessment would therefore need to be extremely thorough and any possibility of impacting nationally important SPA's should render the development unsuitable and an unsustainable development. The same rigorous assessments should be carried out on the potential health and wellbeing effect of the nearby school, supermarket, industrial area and residential area. I would question how these impacts could be given adequate assessment given the dangerous proximity of the plant to residential areas and an SPA.</p>	
1062016, 316	No	<p>This objection is related to Morses Lane proposed waste site in Brightlingsea. I cannot believe that anyone who has given serious consideration to this site has looked stood at the top of the corner of Church Hill Brightlingsea. To see what happens when to large articulated lorries meet each other from opposing direction. There has already been several near misses to major accidents and apart from the obvious loss of life involved should an accident happen. There is also the fact of that is the only way in and out of Brightlingsea. This Road would be closed whilst that major incident is being cleared up. How would ambulances, fire engines or any other emergency services get through!!! That aside how could anyone consider putting that waste development right next to the Largest Supermarket in Brightlingsea, one of the Best Ofsted School, and also Green Belt land and all the other things associated with this Major upheaval to Develop this site. I cannot believe any person who supposedly knows their job!! Would consider building a development like that on a road to a small</p>	Build it somewhere where there is an in and out to the site!!!

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		village (how much disruption and traffic would there be just building it) Absolutely Ludicrous Idea!!!!!!	
1062073, 320	No	<p>Please accept this as my complete disagreement to any proposed plans to site this major recycling centre in Brightlingsea. The roads to Brightlingsea are just not suitable for this kind of added traffic. If approached from the A120 at Frating, the roads become narrower and wind back and forth for approx. 6 miles, there is a main line rail track with unmanned gates, 4 roads converge at this point and it is already under strain from traffic already using this route. When approached from Colchester it is 2 lane traffic all the way to Brightlingsea Church Hill, the only road into and out of Brightlingsea is not physically wide enough to take two 32 Ton lorries at the same time. The lorries servicing the quarry already cause a slow down as they have to turn right, over the oncoming traffic on the very crest of the hill which has a sharp turn to the left. We also have the waste lorries from the existing waste site in Morses Lane. We have had many fatal and life changing accidents on Church Hill over the years. The fact that we already have a recycling centre in Morse's Lane, very close to a senior school &amp; college with over 1400 pupils, should not be a reason to build another site here. Our local five ways CO-OP store is sited very close to the area in question and they already suffer from the awful stink of rotten veg which permeates the whole front of the store from the Eastern Waste Disposal site. There are great empty swathes of land on the A120 just before Frating Grid reference 604894E, 226884N where there is already a waste bulking transfer site, would this not be a much more accessible site and</p>	

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		<p>one which would cut down on the carbon foot print that all the extra mileage to get to us would cause. I haven't mentioned the many other reasons why this proposal W31 should not even be considered for Brightlingsea, the above road issues are reason enough. Brightlingsea is an ancient Cinque Port, Please don't turn it into a Stink Port. I strongly oppose all plans for any more waste sites of any kind in Brightlingsea, Essex, CO7</p>	
921602, 339	No	<p>I am against the proposed planning for the site at Morses Lane, Brightlingsea. I live less than 200 meters away and this will be a disaster for the residents of Samsons Road. My house will be significantly affected if this plan goes ahead as well as my health. Already there is a horrendous amount of lorry traffic from EWD. The smells from there are so bad some days I am unable to open my windows for fresh air. The amount of dust is affecting my health and my house and car are covered with thick dirt all the time. The B1026 is not wide enough and has many dangerous corners not suitable for the volume of traffic it has now, let alone more heavy plant and lorries using it. I am very concerned about the site being in such close proximity to residential homes, a large secondary school and a food supermarket. I believe the best place to situate a development like this is as far away from a town or village. The already used recycling plant on the A120 would be far better.</p>	

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1062149, 342	No	<p>We are writing to you regarding the above mentioned proposal although we have already written to you to express our considerable concern. It would appear that none of these have been considered seriously hence our further email. Points to note:</p> <p>A). Brightlingsea only has one road as access to our town. This road is about 2 miles from the A133 roundabout and is a B road which was not designed to carry heavy traffic. We counted the large heavy lorries on our journey out of Brightlingsea on Monday this week and it totalled 15 in about 6 minutes. Today it was 12! We also counted the bends in that road which totalled 12 most of which are at 45 degrees! I think Essex County Councillors should come and see the logistics of this application for themselves. We wonder how any Council can even consider this heavy traffic on a one road system let alone what is classed as B roads. Unless the Councillors concerned come to see for themselves they will also have no idea what speed these lorries go at. It is certainly not 30 miles an hour and we doubt its 40! B) What would happen if a vehicle broke down or there as an accident? We are pretty sure that in some parts it would be impossible for a fire engine or ambulance to get through. Although there is a cycle path to the right of Church road coming up the hill into Brightlingsea invariably true cyclists won't use it choosing rather to take the road up because the hill is more of a challenge. We have seen vehicles (large lorries) having to back up so the oncoming vehicle can get round some of the bends. There are no passing points either! The size of the traffic is staggering - some of these huge lorries are doubled up with a trailer of the same size! It's inconceivable that any concerned Councillor can agree this proposal in any way.</p>	

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		<p>Nobody can say this would be feasible or safe for any resident or visitor to Brightlingsea. C) As you come along the B1039 at Thorrington before the gates coming to Brightlingsea we assume you are not aware of some cottages which have no path or garden in front so their fascias are actually all most on the road. Has anyone considered how dangerous this is for the occupants or their visitors? There are often cars parked outside them in the road. D) Going back to Church Road on the left before the Church on the right coming into Brightlingsea there is a steep earth bank holding up lots of trees. There is no path between that bank and the traffic. It doesn't much imagination to see what could happen with the size and level of traffic that could use that road. Another point to factor in is that visitor's cars to the Church are very often parked on the left and round the corner where there is an entrance to a commercial concern. There is no crossing which is another area of concern. E) As regards the specific colour coded criteria we understand that all of the judgements for the Brightlingsea proposal are now red. Surely that means this application should be rejected immediately without any further waste of time and money. F) Our main concern is not only the traffic and the problems that it will pose to our community but also the environmental issues which can drastically impact on Brightlingsea's residents seriously affecting their quality of life. The site is near a major senior school, a large supermarket with a growing residential housing area around. There obviously would also be lots of other issues which will become apparent if this scheme goes ahead which will have to be dealt with as well. In the meantime we cannot understand why a more suitable site cannot</p>	

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		<p>be found and at least one that can be accessed via a main dual carriageway not a one way road such as the one into Brightlingsea. Please please reconsider in the light of the above comments and make sure that you don't make a decision you will come to regret in the future.</p>	
1062151, 343	No	<p>I live opposite the proposed mineral waste site. I am very concerned about the impact it is going to be to not only myself but all the residents in Brightlingsea. At Present the EWD lorries go past my house all day from a very early hour, till late, causing noise pollution and fumes from the hundreds of lorries. The road into Brightlingsea narrows at the church where there is a sharp bend in the road. As a driver myself it is quite scary when one of those humongous vehicles come steaming round the corner. There has been several accidents on that bend which in turn cuts Brightlingsea off until cleared as we only have one road in and out. The site will be directly opposite the Colne school and the fumes would directly affect the pupils and staff. The coop superstore would also be affected and I would imagine the dust and possible pollution would affect their customers. There has got to be other places out of Brightlingsea away from mostly elderly residents who would not cope well with the pollution this would cause. We are a small town and I for one and my husband strongly object to this application. Not only for health reasons but this would ultimately affect our house prices. After all who wants to live opposite a tip? No No No to this application.</p>	

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1062217, 369	No	<p>I write to you to express my deep concern with regard to the proposed waste disposal plant in Brightlingsea. Having lived in Brightlingsea for over twenty years I have been aware of a considerable rise in the number of vehicles entering the town via a narrow, twisting road. In this time there have been many accidents on this stretch of road, some of them fatal. In one incident a motorist was killed when a lorry shed its load while negotiating one of the notoriously dangerous bends. The town already has to support a large number of heavy vehicle movements due to the activity on the wharf, Eastern Waste Disposal and the aggregate company. To consider increasing the heavy traffic even further for a small, one road town seems ludicrous. Further to this it would appear that the development will be very close to a supermarket, school playing fields and extremely close to a private residential property. I live roughly a mile away from the EWD plant and can hear lorries reversing under certain wind conditions. I cannot imagine how much noise will be generated by a plant of the proposed nature but no doubt it will be considerable. Why could not a plant of this nature be located at the site of the previous waste disposal facility on the Clacton road which is now unused? Brightlingsea has a reputation as an attractive holiday and recreational seaside town but is=t does not need a reputation as a dumping ground.</p>	



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1062280, NEEB, 384	No	<p>MC1: Schedule of Modifications Page 71 Appendix 14 Table 14 Morses Lane, Brightlingsea</p> <p>RESPONSE: NEEB Holdings requests alterations to the proposed wording</p> <p>DETAIL: It is requested that: It is expected that operations would be enclosed within an appropriate building. Be changed to: Operations will be required to be enclosed within an appropriate building. It is requested that: The configuration and operation of the proposed facility shall have regard to impacts on neighbouring land uses, including the potential impacts on the adjacent retail use. Be changed to: The configuration and operation of the proposed facility will be required to comprehensively address, limit and mitigate any impacts on neighbouring land uses, including the potential impacts on the adjacent retail use.</p>	
1062486, 386	No	<p>I have with the help of others taken note of the modifications, but I am still concerned that the transportation of the waste with its pollutants created by this i.e. diesel fumes, which only recently has been headline news as to the damage this can cause to our health that no mention has been made of looking into this. I also would like to know how the amount of lorries in and out of our road system will not cause problems, now at times when on the local bus to Colchester there can be problems of sudden braking as</p>	

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		lorries from other areas do not always appreciate the bends or narrowing of the road, the bus drivers know where this may occur and obviously are ready for this, but lorries when new on the road of when weather is bad will only have to make one error of judgement and an accident could happen blocking the only road in or out for the whole of the town, for hours. I have experience of this when an accident occurred on the road when I worked in London and it took four hours to clear, this was a lorry which shed load on road and a car with loss of life, so I know only too well this could happen and the traffic movements were nothing like what is proposed. I do hope something will be done on this matter as I and many of the elderly here moved from London and suburbs to get away from pollution (as I was told to get the good sea air and fresh air in your lungs) I suffer with asthma.	
1060915, 388	No	I am objecting to the proposed waste recycling centre proposed in Brightlingsea. My major concern is the increased traffic on narrow, winding roads. This related not only to the road from Thorrington into Brightlingsea- the only road into the town, but also the even more winding road from the A120 from Frating to Thorrington. I am also very disappointed about the very poor consultation with people in the town. I have only today read about the proposal in the local free paper. I did attempt to use the consultation via the ECC website as mentioned in the newspaper but it was not lay person friendly	

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1062680, 389	No	<p>In last week's local paper, delivered on Sunday, it was reported that four acres of Brightlingsea was to be designated for a recycling site. This was the first time we were made aware of this. We already have recycling going on here. There is only one road in or out of Brightlingsea and any further heavy traffic (lorries) will increase further the risk of accidents and pollution. Just one accident on the Brightlingsea road can cause a total stoppage in and out for many hours. There are many dangerous bends particularly at the top of the hill should two large vehicles meet at the same time. The traffic leaving Brightlingsea road early morning is often sold at the junction going to either Colchester or Clacton. What with the extra houses being built here is will get even worse. There are 12,000 vehicles currently driving along the Brightlingsea road daily. We came here to be near the coast for retirement. We don't intend to spend most of our time at the Doctors something we have never done. We have always kept ourselves very fit. We trust some consideration will be given to the people that already live in Brightlingsea. People need who live here either to go to work or leave the area to visit other parts of Essex and a road that can be blocked for a long time and no one can get out for any reason should have some consideration</p>	
1062700, 390	No	<p>The volume of traffic to and from Brightlingsea will be increased enormously. Traffic in and out of the town is already appalling. 12,000 vehicles were counted coming in and out of Brightlingsea on one day. This is in itself disastrous; to contemplate increasing this amount beggars belief! Brightlingsea because of the large building developments being planned and</p>	

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		<p>built by Tendring district council and passed and endorsed by Essex County Council. And fact that the infrastructure in the town is non-existent and is not being taken into consideration is more than enough for the residents to bear. To add to this the noise, pollution, dust and the debris which will inevitably be dropped from the lorries is unthinkable. Eastern Waste Disposal cause enough dust and noise already without adding to it. Of the risk to health of the residents and the pupils of the Colne Community School there is no doubt. The increased traffic in Church Road and the hill going up towards All Saints does not bear thinking about. These vehicles will be carrying heavy loads and the risk to the foundations of All Saints need to be considered as a matter of urgency. The church is very ancient and it was not built to withstand the increase in vibrations from the increased number of heavily laden lorries. The hill is already used by double decker buses and very large vehicles also the school buses going to and fro each day; this is more than enough without adding to it. A survey of All Saints should be carried out by civil engineers to assess the risk to the foundations before a definitive decision is made. Yet again Brightlingsea has been made a dumping ground for this Waste Recycling Centre which other areas surrounding Brightlingsea have refused to entertain. This town is fast becoming a large carpark because of all the building developments in the town. We should not be subjected to any more disruption to our roads than we already have to put up with. All the roads are in a disgusting state of repair which cannot be blamed on the winter weather alone. The enormous amount of traffic now in the town is unbearable and untenable and we don't</p>	

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		want any more traffic to add to it. Basically the residents of Brightlingsea have had enough of their town being a dumping ground. I trust my concerns and the serious concerns of the residents in the town will be considered, in particular the risk to the fabric of All Saints church.	
922608, 392	No	What about the word no do you not understand. Too close to residents, would you like it a few metres from your lounge window, near a supermarket and school. Very populated residential area and roads that won't take the extra traffic. Brightlingsea is not suitable stop telling us what we want and listen to the facts and the people who live here. Better still why don't you have it where you live. Please, please think again.	
297987, 397	No	We would like to strongly object to the proposed Inert Waste Recycling Centre at Morses Lane, Brightlingsea. Brightlingsea is a small coastal town with only a single narrow road accessing the village. The constant passage of heavy lorries in and out of our town causes exponential wear and tear on the road surfaces and the lorries often leave dangerous debris on the roads. At peak time there are already queues forming to get in and out of the town without the addition of more traffic. These large noisy lorries also have to drive close to houses along a primary residential road. If the waste centre is to have an anaerobic digestion power and heat plant, surely this will pollute the air? The site is located very close to a popular food store a large secondary school with open playing fields within 200metres and dense residential housing/. Surely not an ideal location in anyone's imagination for a	

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		noisy air polluting industrial use. Amendments to the proposal on the consultation document comment that it is expected that operations would be enclosed with an appropriate building are a gross understatement. We would ask that ECC should make this a specific requirement and strictly impose that any storage use or recycling on this site should only be carried out within a suitable sound insulated building that has been discretely designed to a high standard to fit into the rural surroundings and that no polluting anaerobic power plant should be allowed. We would ask the ECC should de select this option, or at the very least impose very strict controls upon the operator to control noise and air pollutions at the very least.	
1062787, 415	No	I would like you to reconsider your decision to allow this expansion of Eastern waste disposal site in Morses Lane. As I have explained in previous emails, I am extremely concerned about the extra vehicles that will be using the surrounding roads, the current EWD staff drive at speed when leaving the site, not taking into consideration other road users, there have been many near misses at the Morses lane junction. This will only get worse. My parents own the property immediately next door to EWD I understand my Father has invited you to visit his home to show the effect this expansion would have on his property ,nobody has responded to his invitation .It does feel that ECC are not showing any thought for the residents of Brightlingsea, I am sure there would be a different outcome if the staff dealing with this proposal lived locally	

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1062798, 421	No	<p>I would like to strongly object to the nature of the development that has been proposed on the adjoining land. The development being only 16 metres from the house will have an unquantifiable negative effect on both the house and garden. My parents have owned this house for over 45 years and have made it a Hub for the family with 5 children 16 grandchildren and 2 great grandchildren. There is always activity and frequent visitors. The garden has held endless birthday parties, Camping weekends, 6 wedding receptions, 4 christenings and 3 golden weddings. Additionally 3 garden fetes have been held for charity raising in excess of £15,000. The small woodland has been successfully managed to encourage as much wildlife as possible. I know all these things are of little interest, a but I hope they do paint a picture as to how a development of this nature would not only have a negative impact on the value and appeal of the house, but would also pollute the SOUND, LIGHT and AIR having a detrimental effect on so many people and wild life. I know my father has suggested a site visit to the house so you could truly see the devastating effect the proposal would have and as yet he has received no response. I would also like to invite you on behalf of my family and look forward to a response.</p>	
1062832, 434	No	<p>This is my parents' property and it immediately adjoins the proposed earmarked location, it is the only immediate residential property neighbouring the site and feel has been completely overlooked by planners. With this in mind I would like to raise a number of major concerns: 1) Noise, light, dust, fumes, vermin, smells, etc., 2) The height of the building/buildings 4) Hours of</p>	

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		<p>working 3) Devaluation of Oakwood On plan it may not be obvious just how close Oakwood is to the boundary and the impact it would have. This is causing great concern for my elderly parents and there is a great need for them to be directly consulted. We would welcome a visit from you. I look forward to hearing from you.</p>	
1062886, 436	No	<p>We learn from the local paper that Morses Lane is still being considered a suitable site for a waste processing plant. It is extremely difficult to understand why.</p> <ul style="list-style-type: none"> <li>• Many other co-respondents have pointed out the negative effects such a development would have on the town, its proximity to the school and supermarket, and the inaccessibility of the road to Brightlingsea.</li> <li>• If, in spite of all advice to the contrary, these changes are permitted please take every care to minimise the impact on the surrounding area.</li> <li>• My parents' house in Samson's Road is the nearest dwelling. Can you assure us that they will not be affected by noise and dust?</li> <li>• They are not "sensory receptors" but people.</li> </ul>	
988628, 446	No	<p>Further to the amended details for the planned recycling plant in Brightlingsea, I wish to say I still feel there must be better situated sites in Essex. There is still one road in and out with many heavy vehicles using it. There is also a school/college and supermarket in the vicinity which surely would be affected by noises and dust</p>	



Person ID, Organisation, Comment ID	Do you agree with proposed modification M17?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		fallout.	
1062925, 451	No	The proposed area is unfit for purpose. Moved to this area of Brightlingsea 95% people of retiring age, disabled and breathing problems majority are bungalows % of housing are affordable pollution increases noise, heavy vehicle movements, school & retail business wildlife, include owls, woodpecker, bats. Road infrastructure unsuitable lives have been lost.	
1063382, Tendring District Council, 484	Yes	Within modified Policy 3 (Strategic Site Allocations) of the RWLP the Morses Lane site remains promoted as a site for inert waste recycling despite this Councils previous comments. Within modified Policy 12 (Transport and Access), an additional criterion has been drafted: Where access to the main road network in accordance with (b) and (c) above is not feasible, road access via a suitable existing road prior to gaining access onto the main road network will exceptionally be permitted, having regard to the scale of the development, the proximity of sensitive receptors, the capacity of the road and an assessment of the impact on road safety. This helps to address the first part of our second objection. Within modified Table 14 (Morses Lane Brightlingsea), two additional bullet points have been added to the explanatory text. This state: It is expected that operations would be enclosed within an appropriate building. And The configuration and operation of the proposed facility shall have regard to impacts on neighbouring land uses, including the potential impacts on the adjacent retail use. The above modifications to the supporting text to Table 14, along with the modifications to Policy 12 address TDCs second	Given the above proposed modifications, TDC consider the Replacement Waste Local Plan Schedule of Modifications to be sound. TDC also recommends continues involvement of its members, land owners and town councils in the waste local plan process to ensure its deliverability.

Person ID, Organisation, Comment ID	Do you agree with proposed modification M17?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		objection. We therefore no longer object to the to the proposed site at Morses Lane and withdraw our objection accordingly.	
1063440, Natural England, 500	Yes	We note that this site will be subject to further HRA screening due to the proximity with European and internationally designated sites.	

### Modification M18 – Newport Quarry

Person ID, Organisation, Comment ID	Do you agree with proposed modification M18?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
922465, Needham Chalks (HAM) Limited, 1	No	With regard to the second bullet, the first sentence includes the modified wording careful consideration of the environmental and visual impacts will be necessary particularly if a proposal relates to already restored areas. Justification given for the modified wording is to strengthen the intended protection of local amenity to address the concerns of local residents. However, looking back through comments from local residents, i.e. Newport Parish Council, concerns were expressed regarding a number of matters but no mention was made of visual impacts.	To remove the words and visual impacts from the second bullet as it doesn't accurately reflect residents' concerns.
953880, Widdington Parish	Yes	Widdington Parish Council supports the modifications within the consultation Appendix 16 - table 15 - Newport Quarry, and reiterates the importance of vehicles only accessing the quarry from the B1383 and not going through Widdington village unless	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M18?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
Council, 52		servicing a Widdington address.	
1599, Newport Parish Council, 423	Yes	Newport Parish Council supports the modifications within the consultation Appendix 16 - Table 15 Newport Quarry and emphasises the importance of vehicles only accessing the quarry from the B1383 and not going through Widdington village unless servicing an address in Widdington.	
1063440, Natural England, 501	Yes	We previously wrote on 16 November 2015 that we had no specific comments regarding the addition of Newport Quarry (our ref: 168966) as an allocation. We welcome the additional detail on restoration type (to lowland calcareous grassland priority habitat) as this fits the context of the South Suffolk and North Essex Clayland National Character Area in which Newport Quarry sits.	

### Modification M19 – Rivenhall

Person ID, Organisation, Comment ID	Do you agree with proposed modification M19?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
1053830, 3	No	Rivenhall site has been refused Environmental Licence by the Environmental Agency, therefore should be excluded from the document.	Table 16 Rivenhall should be excluded from the document.
1053830, 11	No	ECC have removed geographical restrictions in import of waste to the site. Therefore this site may potentially not process any	Table 16 Rivenhall and any mention of Rivenhall site should be removed from the Waste Plan.

Person ID, Organisation, Comment ID	Do you agree with proposed modification M19?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		waste from Essex as this will be dependent on legal fair tender, by which non-county providers may outbid Essex providers for waste management.	
609943, KTI Energy Limited, 13	No	Objection to Rivenhall incinerator These criteria were not available to Essex County Council when the developer of the Rivenhall approached the County Council for planning consent. With no competing project on offer at the time, the County Council offered that developer every assistance notwithstanding the claim for the project to be CHP is highly suspect. Information in the public domain suggests the project is designed to de-ink waste paper. Making comparison with the electricity and heat demand of the much larger Kemsley paper mill, probably a 3-4MWe gas turbine would suffice with its exhaust passing through a Heat Recovery Steam Generator to provide necessary heat. However, the Schedule of Modifications No 19 proposes increasing delivery of waste to Rivenhall from 360,000 t/a to 595,000 t/a placing the project on a par with the Allington incinerator in terms of 40-45MWe electricity output. Essex County Council hence proposes that by the Rivenhall project using 2.5MWe electricity and 2.0MWth heat in-house, while exporting minimum 36MWe electricity to the grid, a gullible public is expected to accept that the project is good quality CHP and not an incinerator.	
1057930, Kelvedon Parish Council, 29	No	The planning committee noted the Consultation period (open for comments for six weeks until 16 February) and wished to make the following observations: Modification No. 19 Indicative Facility Scale: Anaerobic Digestion 85,000tpa -> 30,000tpa Combined Heat & Power 360,000tpa -> 595,000tpa Kelvedon Parish Council objects to the changes on the basis that the 90% increase in the amount of material burnt is not sustainable development as the pro rata increase in emissions, materially increases the environmental impact and the health effects on the local community. In addition, Kelvedon Parish Council feel that it is unnecessary to implement such an increase, when there are	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M19?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		other sites in close proximity i.e. Basildon and Ipswich, which are currently operating under capacity. Kelvedon Parish Council would prefer that these are both fully utilised before any further increase is agreed at other sites.	
985065, 41	No	THERE IS A SIGNIFICANT QUESTION OVER WHETHER THE PROPOSED RIVENHALL SITE WOULD STILL BE CLASSED AS CHP FOLLOWING THE S73 PLANNING PERMISSION GRANTED BY ECC IN EARLY 2016. THE INCINERATOR CAPACITY WAS INCREASED BY 65% BUT THE PRIMARY USER OF HEAT THE ON-SITE PAPER PULPING UNIT CAPACITY WAS REDUCED BY 53%. GIVEN THAT AT THE PREVIOUS TONNAGES (360,000 TPA FOR BOTH CHP AND THE PULP UNIT) THE SITE WAS SAID TO USE ALL THE HEAT PRODUCED, IT IS NOT CLEAR HOW THE SAME WOULD BE TRUE AT 595,000 TPA FOR THE INCINERATOR AND 170,000 TPA PULP. FURTHERMORE, THE ENVIRONMENT AGENCY REFUSED THE PERMIT APPLICATION FOR THE RIVENHALL SITE IN DECEMBER 2016 PRIMARILY BECAUSE OF THE FAILURE BY GENT FAIRHEAD TO DEMONSTRATE BAT FOR THE INCINERATOR/CHP UNIT.	
1059617, 56	No	I oppose the change to table 16 Rivenhall airfield as the indicative scale is changed from 369,000 tpa to 595,000 tpa combined heat and power (CHP)	Should the Rivenhall site still be classed as CHP following this change which also questions the S73 planning permission granted by ECC in early 2016? The incinerator capacity was increased by 65% but the primary user of heat the paper pulping unit capacity was reduced by 53% therefore excess heat would be unused. Furthermore the environment agency refused a permit due to failure to demonstrate BAT for the incinerator/CHP unit in December 2016.
983638, 67	No	In the S73 Planning Permission granted by ECC in 2016 the incinerator capacity for Rivenhall was increased by 65%, whilst the primary user of heat (the on-site paper pulping unit capacity)	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M19?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		was reduced by 53%. The previous tpa quote of 360,000 was said to use all the heat produced. Therefore, how can this still be true for the new figures of 595,000 tpa for incineration/170,000 tpa for pulp? As the environment agency has refused the permit application for the Rivenhall site, due to BAT for this incinerator and CHP unit, it is difficult to see how the proposed Rivenhall site can be classed as CHP.	
1060507, Coggeshall Neighbourhood Plan Committee, 83	No	THERE IS A SIGNIFICANT QUESTION OVER WHETHER THE PROPOSED RIVENHALL SITE WOULD STILL BE CLASSED AS CHP FOLLOWING THE S73 PLANNING PERMISSION GRANTED BY ECC IN EARLY 2016. THE INCINERATOR CAPACITY WAS INCREASED BY 65% BUT THE PRIMARY USER OF HEAT THE ON-SITE PAPER PULPING UNIT CAPACITY WAS REDUCED BY 53%. GIVEN THAT AT THE PREVIOUS TONNAGES (360,000 TPA FOR BOTH CHP AND THE PULP UNIT) THE SITE WAS SAID TO USE ALL THE HEAT PRODUCED, IT IS NOT CLEAR HOW THE SAME WOULD BE TRUE AT 595,000 TPA FOR THE INCINERATOR AND 170,000 TPA PULP. FURTHERMORE, THE ENVIRONMENT AGENCY REFUSED THE PERMIT APPLICATION FOR THE RIVENHALL SITE IN DECEMBER 2016 PRIMARILY BECAUSE OF THE FAILURE BY GENT FAIRHEAD TO DEMONSTRATE BAT FOR THE INCINERATOR/CHP UNIT.	
477311, 92	No	THERE IS A SIGNIFICANT QUESTION OVER WHETHER THE PROPOSED RIVENHALL SITE WOULD STILL BE CLASSED AS CHP (Combined Heat and Power) FOLLOWING THE S73 PLANNING PERMISSION GRANTED BY ECC IN EARLY 2016. THE INCINERATOR CAPACITY WAS INCREASED BY 65% BUT THE PRIMARY USER OF HEAT THE ON-SITE PAPER PULPING UNIT - CAPACITY WAS REDUCED BY 53%. GIVEN THAT AT THE PREVIOUS TONNAGES (360,000 TPA FOR BOTH CHP AND THE PULP UNIT) THE SITE WAS SAID TO USE ALL THE HEAT PRODUCED, IT IS NOT CLEAR HOW	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M19?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		THE SAME WOULD BE TRUE AT 595,000 TPA FOR THE INCINERATOR AND 170,000 TPA PULP. FURTHERMORE, THE ENVIRONMENT AGENCY REFUSED THE PERMIT APPLICATION FOR THE RIVENHALL SITE IN DECEMBER 2016 PRIMARILY BECAUSE OF THE FAILURE BY GENT FAIRHEAD TO DEMONSTRATE BAT FOR THE INCINERATOR/CHP UNIT.	
735401, Basildon Borough Council, 135	Yes	Support the principle of increasing the CHP capacity as it helps to ensure other Essex areas share the burden of waste related development and ensures the plan is based on up to date information.	
987897, 171	No	I do not think it appropriate to assume that the proposed Rivenhall site can be classed as a combined heat and power site. In early 2016, ECC granted permission by way of a S73 variation to the original permission for this site, such that the incinerator capacity was increased by 65%. However, the primary user of heat, i.e. the on-site paper pulping facility was reduced by 53%. It is no longer clear how the heat generated with the now planned 595,000 tonnes per annum incinerated material could be used, given the reduction in proposed pulping. Note also that the environment agency has refused the permit application for this site in December 2016, largely because of the applicant's failure to demonstrate Best Available Technology for the incinerator.	
1061659, 178	No	THERE HAVE BEEN CHANGES TO SIZE AND SCALE OF THE SITE AND OUTPUT WHICH SEEM TO CONFLICT EACH OTHER. THERE IS A SIGNIFICANT QUESTION OVER WHETHER THE PROPOSED RIVENHALL SITE WOULD STILL BE CLASSED AS CHP FOLLOWING THE S73 PLANNING PERMISSION GRANTED BY ECC IN EARLY 2016. THE INCINERATOR CAPACITY WAS INCREASED BY 65% BUT THE PRIMARY USER OF HEAT THE ON-SITE PAPER PULPING UNIT CAPACITY WAS REDUCED BY 53%. GIVEN	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M19?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		THAT AT THE PREVIOUS TONNAGES (360,000 TPA FOR BOTH CHP AND THE PULP UNIT) THE SITE WAS SAID TO USE ALL THE HEAT PRODUCED, IT IS NOT CLEAR HOW THE SAME WOULD BE TRUE AT 595,000 TPA FOR THE INCINERATOR AND 170,000 TPA PULP. FURTHERMORE, THE ENVIRONMENT AGENCY REFUSED THE PERMIT APPLICATION FOR THE RIVENHALL SITE IN DECEMBER 2016 PRIMARILY BECAUSE OF THE FAILURE BY GENT FAIRHEAD TO DEMONSTRATE BAT FOR THE INCINERATOR/CHP UNIT.	
1061682, 196	No	In early 2016 the s73 planning permission granted for a CHP plant. As the incinerators capacity has increased by 65% but the main heat user the onsite paper pulping unit been reduced by 53%, previous tonnages were 36,000tpa for both chip and pulp unit the site was to use all heat produced. I don't know how this could be the case as tpa has increased to 595,000 for the incinerator and 170,000 tpa pulp. As Gent Fairhead could not demonstrate bat for the incinerator/CHP unit they were refused a permit from the environment agency.	
1061711, Goslings Granary, 210	No	A change is required to the Replacement Waste Local Plan Appendix B Allocated Sites: Development Principles Table 16 Rivenhall - Estimated Availability- "Can be implemented immediately." Should be deleted and replaced with "Will require further planning permission and an Environmental Permit." The justification for this proposed change is to be 'effective' and 'positively' prepared the Plan must reflect the best available data."	
1059617, 226	No	A change is required to the Replacement Waste Local Plan Appendix B Allocated Sites: Development Principles Table 16 Rivenhall - Estimated Availability- "Can be implemented immediately." This must be deleted and replaced with "Will require further planning permission and an Environmental Permit and to tender successfully for the contract." The justification for	



Person ID, Organisation, Comment ID	Do you agree with proposed modification M19?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		this proposed change is in order to present the current situation and best possible practise. Would the proposed Rivenhall site be classed as a CHP following the S73 planning permission granted in 2016 with the incinerator capacity being increased by 65% but the primary use see of the heat- the onsite paper pulping capacity being reduced by 53%? Further still the Environment agency refused an environmental permit in December 2016 as Gent Fairhead failing to demonstrate BAT for the proposed incinerator/CHP unit.	
988283, Bradwell with Pattiswick Parish Council, 233	No	There is a significant question over whether the proposed Rivenhall site would still be classed as CHP (combined heat and power) following the s73 planning permission granted by ECC in early 2016. The incinerator capacity was increased by 65%, but the primary user of heat the on-site paper pulping unit - capacity was reduced by 53%. Given that at the previous tonnages (360,000 tpa for both CHP and the pulp unit) the site was said to use all the heat produced, it is not clear how the same would be true at 595,000 tpa for the incinerator and 170,000 tpa pulp. Furthermore, the Environment Agency refused the permit application for the Rivenhall site in December 2016 primarily because of the failure by Gent Fairhead to demonstrate BAT for the incinerator/CHP unit.	
1061886, 253	Yes	I have recently picked up a leaflet from PAIN, an organisation which opposed the building of the Rivenhall incinerator. I think the incinerator is an excellent idea as long as it is modern and efficient. We produce far too much rubbish anyway, and a lot of it cannot be either recycled or composted. The choice is either burning it or letting it accumulate. The heat produced by incineration can be a used to generate electricity and it could be a useful source of local employment. I hope very much that you will not stand in the way of this project.	
1062089, Coggeshall	No	We believe there is a significant question over whether the proposed Rivenhall site would still be classed as CHP following	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M19?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
Parish Council, 325		<p>the s73 planning permission granted by ECC in early 2016. The incinerator capacity was increased by 65% whereas the on-site paper pulping unit capacity was reduced by 53%. Given that at the previous tonnages (360,000 tpa for both CHP and the pulp unit) yet the site was said to use all the heat produced, it is not clear how the same would be true at 595,000 tpa for the incinerator and 170,000 tpa pulp with no increase in energy produced and a significant increase in CO2 outputs thereby questioning the energy from waste element aspect.</p> <p>Furthermore, the changes in proportions are not reflected in the accompanying Environmental impact reports (these use the 2010 proportions). The new proportions for the plant are not clearly explained, evaluated and the required stack height changes negate ALL the air quality modelling, the receptor positions and the associated data acquired. All this supports the environment agency permit refusal for the Rivenhall site in December 2016.</p>	
1062112, 334	No	<p>Allocating Rivenhall airfield to receive Essex waste from Basildon and waste from London post 2026 is not a minor change. The distance from Basildon to Rivenhall is between 30 and 40 miles by doing this ECC would not be minimising HGV distances when there are closer sites. This would not be minimising CO2 emissions and protecting the air quality.</p>	
1062131, Marks Tey Parish Council, 340	No	<p>Last night, the PC passed the resolution below, which relates to M19, which we oppose: " The PC notes that the Rivenhall plant will be expected to take 300000 tpa of waste for anaerobic digestion (which was originally 830000 tpa) and 595000 tpa of waste for combined heat &amp; power breakdown, which is over 200000 tpa more than originally planned, &amp; has three objections: 1. Burning the waste on this scale will be environmentally damaging &amp; lead to increases in emissions, &amp; a decline in the air quality locally. This will be potentially dangerous to many &amp; particularly to older people. 2. As there are alternative sites locally, at Basildon &amp; Ipswich, with surplus</p>	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M19?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		capacity for these kinds of waste, they should be used before other sites are considered" 3. The PC remains concerned about the increased traffic, and believes some of this could be reduced by a junction on the proposed A120"	
1062747, 398	No	It is with some surprise that subsequently to the adjournment of the Public Hearings at the end of October, no mention of the rejection of an Environmental Permit for the Rivenhall IWMF (Dec 16th )	
743809, 455	No	WOULD THE PROPOSED RIVENHALL SITE STILL BE CLASSED AS CHP FOLLOWING THE S73 PLANNING PERMISSION (GRANTED BY ECC EARLY 2016)? THE INCINERATOR CAPACITY WAS INCREASED BY 65% BUT THE PRIMARY USER OF HEAT IS ONLY THE ON-SITE PAPER PULPING UNIT THE CAPACITY FOR WHICH WAS REDUCED BY 53%. GIVEN THAT AT THE PREVIOUS TONNAGES (360,000 TPA FOR BOTH CHP AND THE PULP UNIT), THE SITE WAS SAID TO USE ALL THE HEAT PRODUCED, IT IS NOT CLEAR HOW THE SAME WOULD BE TRUE AT 595,000 TPA FOR THE INCINERATOR AND 170,000 TPA PULP. THE APPLICANT NEEDS TO BE ASKED FOR DETAILS ON THIS PLEASE NB THE ENVIRONMENT AGENCY HAS ALREADY REFUSED THE PERMIT APPLICATION FOR THE RIVENHALL SITE (2016) PRIMARILY BECAUSE OF THE FAILURE BY GENT FAIRHEAD TO DEMONSTRATE BAT FOR THE INCINERATOR/CHP UNIT.	
1062948, 462	No	I live Kelvedon and I am very concerned about the ever changing plans for the Rivenhall incinerator. They have changed quite considerably compared to their original planning application making it bigger and with little information about waste and local contamination to the local waterways. The bigger scale also would increase air pollution to the local area and effect our environment. Initially I was under the understanding that the incinerator would only take local waste.	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M19?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		Why is there the possibility of also taking waste from /Basildon and London? (Mod 5 main policy 3 clause 3 updates). This will also increase HGV transportation costs and pollution...therefore I feel this is not a minor impact. Please take seriously our concerns and relook at this planning application and its implications to the surrounding population and environment.	
618724, 510	No	THERE IS A QUESTION AS TO WHETHER THE PROPOSED RIVENHALL SITE WOULD STILL BE CLASSED AS CHP FOLLOWING THE S73 PLANNING PERMISSION GRANTED BY ECC IN EARLY 2016. ALL THE HEAT AND THE MAJORITY OF ELECTRICITY WAS TAKEN WITHIN THE PLANT AND NOT PRODUCED FOR DISTRICT BENEFIT IN THE ORIGINAL CONSENT. NOW THE INCINERATOR CAPACITY HAS INCREASED BY 65% TO 595,000 TPA IN THE S73 CHANGE BUT THE PRIMARY USER OF HEAT THE ON-SITE PAPER PULPING UNIT CAPACITY - WAS REDUCED BY 53%. GIVEN THAT AT THE PREVIOUS TONNAGES (360,000 TPA FOR BOTH CHP AND THE PULP UNIT) THE SITE WAS SAID TO USE ALL THE HEAT PRODUCED, IT IS NOT CLEAR HOW THE SAME WOULD BE TRUE AT 595,000 TPA FOR THE INCINERATOR AND 170,000 TPA PULP. FURTHERMORE, THE ENVIRONMENT AGENCY REFUSED THE PERMIT APPLICATION FOR THE RIVENHALL SITE IN DECEMBER 2016 PRIMARILY BECAUSE OF THE FAILURE BY GENT FAIRHEAD TO DEMONSTRATE BAT FOR THE INCINERATOR/CHP UNIT. THE PLAN MAY NEED TO BE AMENDED IF RIVENHALL IS NO LONGER CHP.	
911132, Cressing Parish Council, 520	No	There is a significant question over whether the proposed Rivenhall site would still be classed as CHP (combined heat and power) following the s73 planning permission granted by ECC in early 2016. The incinerator capacity was increased by 65% but the primary user of heat the on-site paper pulping unit - capacity was reduced by 53%. Given that at the previous tonnages (360,000 tpa for both CHP and the pulp unit) the site was said to	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M19?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		use all the heat produced, it is not clear how the same would be true at 595,000 tpa for the incinerator and 170,000 tpa pulp. Furthermore, the Environment Agency refused the permit application for the Rivenhall site in December 2016 primarily because of the failure by the applicant to demonstrate BAT for the incinerator/CHP unit.	
988001, 540	No	I understand that the application by Gent Fairhead, for the Rivenhall IWMF, to the Environment Agency was rejected and that they intend to resubmit their application shortly. I write to: - (i) fully endorse the views expressed in the letter sent to ECC by Peter Kohn on behalf of the Coggeshall Neighbourhood Planning team (ii) comment further on the intention, by Gent Fairhead to submit a new application with ECC to vary the permission on the stack height from 37m to 85m. As I understand it, the maximum stack height was fixed at 37m and the arguments for this limit fully rehearsed in discussions and in subsequent planning documents. An increase of almost 137% in the proposed height represents a material change in the plan, not a minor amendment. The I trust that Gent Fairhead will be required by ECC to re-submit their entire plan, which will then proceed via the normal process, with all the necessary scrutiny and consultation before a final decision is reached. The thought of a tower 37m high, looming over the Essex countryside, spouting toxic fumes and polluting land of all kinds: agricultural and forestry, lightly and heavily populated, is not one anyone would relish. The visual impact alone of increasing the tower height by 48m (well over double the height) would be hugely detrimental to the outlook from all directions. It should be noted that planned developments in Kelvedon, West Tey, etc. (all within range of pollution from the incinerator), would in all probability, raise the number of people affected by perhaps 50,000 to 80,000. The reason for limiting the stack height to 37m, are as valid now as they were when planning permission was granted. I hope they will be vigorously applied when the	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M19?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		new application is considered.	

### Modification M20 - Sandon

Person ID, Organisation, Comment ID	Do you agree with proposed modification M20?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
735401, Basildon Borough Council, 136	Yes	Support the principle as it helps to ensure other Essex areas share the burden of waste related development and ensures the plan is based on up to date information.	

### Modification M21 – Sunnymead, Elmstead and Heath Farms

Person ID, Organisation, Comment ID	Do you agree with proposed modification M21?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
496468, David L Walker Limited, 9	Yes	Tarmac support the main modification 21 with the inclusion of C&D recycling within the plant site area for site L (i) 5, subject to a few comments on the issues and opportunities which are detailed on the form attached. No further comments are presented in respect of the remainder of the main consultation document. Please find attached completed response form covering the comments on Appendix 17 above, covering details	The focus of the modification is agreed, save for the following:-  1. Instead of using the current site access, Tarmac proposed to establish a new access into site L(i)5, which site W36 would also benefit from. The proposed access point has been

Person ID, Organisation, Comment ID	Do you agree with proposed modification M21?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>for site L(i)5 (table 19). We note the new assessment profile in document MC2 for site W36 (as a replacement for site W13) Tarmac agree with the majority of the assessments apart from question 3D of site W36, where we do not believe that 66 sensitive receptors are within a 250m radius of the site. The plan extract attached only shows a handful of properties to the east of the proposed allocation within a 250m radius. As such the site should be scored Amber 1.</p>	<p>selected and designed within the appropriate consideration of traffic flow and speeds along the B1027. Details of the design and speed will be provided as part of any planning application. The opportunities and issues list should be amended as such.</p> <ol style="list-style-type: none"> <li>2. The entirety of site L(i)5 is allocated for minerals extraction, under which the site also benefits from a flagship status under the biodiversity SPG which supports the minerals plan. It is therefore suggested that the first sentence of the 6th bullet point should be deleted.</li> <li>3. The specific issues on site 1 are agreed.</li> <li>4. However under the specific issues on site 2, Tarmac question the need for bunding along the southern perimeter of the proposed recycling area, as an established hedgerow is already present and effective. It is suggested that the western perimeter would be more in need of bunding to restrict views off the B1027 into the site from the west.</li> </ol>
1060282, 75	No	<p>Birds Farm is an established Holiday Cottage business and residential property, 150m to the north of the proposed Inert Waste Recycling operations at site 2. 1) We object to the specific location of site 2. It appears to have been chosen because it's likely to offer an alternative access onto the B1027, not only for site 2, but also for Site 1 operations. 2) Why isn't a</p>	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M21?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>more central location within L (i) 5 being considered, perhaps adjacent to the western boundary? It's closer to the haul road access and away from the properties to the north and east. 3) MC1, appendix 17,page 74 states for site 1, that a minimum of 100m standoff is to be provided for all residential properties and effective screening provided to screen views of the site. Why does site 2, not have to comply with the same criteria? 4) What are the specific requirements going to be at site 2, to mitigate the noise and dust pollution?</p>	
1059253, 99	No	<p>Our property seems to have been totally overlooked in connection with the RWLP. Your letter of 03/01/2017 is the first notification to have been seen. This very small and insignificant property was purchased in the summer of 2014 and has remained empty till we engaged in building works to convert it into a substantial family house with non-polluting amenity value and uninterrupted views of the countryside. This was to have been a residence with long term potential. These works are now almost completed but would never have been undertaken in the light of what we now know. The works would have enhanced its value considerably. On review the whole RWLP project seems to be gathering momentum beyond what was originally set out. Site 2 has been added in and the term extended from 8 through to 17 years and not only that but Tarmac is now asking for a new site access.</p>	<p>1. New Site 2 is not to go ahead at all as impacting on the unspoilt setting of Rosedean and others and as such diminishing the investment and added value applied to it. Visual , noise ,and dust pollution issues as well as diminution of property value will be impacted. I would suggest bunding would not overcome these very real concerns. 2. Any new plant and machinery that is needed for site 1, if it is , to be placed out of mind and sight of all residential property. It could easily remain where it currently is or if necessary be placed on the western edge of the site along where the current access road links to it. 3.Any access / haul road / site access change to be opposed. There is no reason at all why the current facility can't remain. Altering it would impact on neighbouring property as well as the busy B1027. 4. Surely the length of time the project is set to run could be reined in. Have pity on the resident population. What is proposed now is more than double</p>



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			the initial plan.
1059221, 112	No	<p>I would question the validity of the whole of the RWLP document as it exists as it is so sparse in detail. Furthermore it seems to be gaining momentum without clarification of its full context. Quite clearly local parishes and residents are unaware of what is afoot. The notification only just received (seen for the first time on receipt of the letter dated 03/01/2017) is wrapped up in ECC policy type wording and difficult to understand. It would seem that new site 2 proposed is to be used for the processing of recycling material for use both on site and at other sites too. This presents highways issues--products being transported both in and out. Properties to the east have been dismissed as insignificant by Tarmac in their fresh submission. It has been established policy that a 250m boundary is maintained when developing such schemes which should surely apply without exception. Prevailing weather /wind would tend to in the direction towards north /east which would enhance the pollution concerns of noise and dust etc. for residences to the north and east of the site. Footpaths currently enjoyed by many must be maintained. The original 8 year period has now become 17. This has further impact on quality of life and unspoilt countryside with its views and inherent ecology.</p>	<p>Site 2 should not be used as proposed at all--no need -- only use current access routes on the site together with existing screening, grading, crushing, plant facilities. Ensure a minimum 250m boundary is maintained around the site wherever residential property happens to be regardless. Reduce the time scale back to what was originally proposed. Fully protect residents from visual , noise , dust pollution etc. That properties that stand to be impacted the most be fully compensated. That all trucks keep to clearly defined and enforced routes on the highway. At present they go whichever way they please.</p>

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984607, 118	No	<p>Thank you for the opportunity to respond to this consultation. As the property owner of Rosedene, I am strongly opposed to the amendments suggested, in particular the addition proposed of site 2. Having recently developed this property and look forward to a long term quality of life here. My property backs directly onto site 2 and would have hugely detrimental impact, including but not limited to the following: - Movement and crumbling of house foundations due to movement in the ground nearby from equipment and digging out the ground. - Severe noise pollution from nearby machinery - Severe dust pollution with potential health issues due to contamination in the air and breathing in dust and dirt - Severe water and soil contamination from machinery fuel and oil and potential health issues through drinking water, and potential impact on environment and property landscaping, and wildlife in surrounding area - Increased road traffic on the B1027, an already very very busy road with a minimum of 11,000 cars day, causing danger for both entering and exiting the property - I am highly opposed to the clear proposal from David Walker Associates (acting on behalf of Tarmac) of an additional entrance to the left of my property Rosedene directly on to the B1027, on to the site due to limited visibility and the fact that the B1027 is unable to cater to the addition traffic from HGV's and severely detrimental impact this will have to me as owner of Rosedene, and locals in the surrounding villages - Extreme danger for cyclists and young children on the B1027 from the large tipper lorries, in particular young children when at my property Rosedene - Damage of surrounding view both day and night - Adverse and detrimental</p>	<p>I consider it of highest importance that Site 2 is eradicated from the suggested proposal for the above mentioned reasons and that no equipment is moved within this area at all. The existing entrance should be maintained as originally laid out, meaning that the existing equipment can continue to be utilised, as it currently is. A minimum of 250m boundary must be maintained around my property, and all other residential properties. Reduce the timescale back to 8 years maximum Proper bunding to be implemented around the whole site 1, where there is any potential impact to any property Fully methodology and proposal to protect all residents from visual, noise, dust pollution, damage to property foundations, water contamination, and soil contamination Full compensation to property owners in the area such as myself who are directly impacted All HGV's and commercial vehicles to adhere to defined routes on the highway, rather than short cutting across country.</p>

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		effects to property value - Overall impact on quality of life severely adverse, particularly in relation to health implications mentioned above I am also very concerned as to the limited information and notifications that have been distributed, as very few seem to be aware what is happening, and on looking into, very little information is provided as needed.	
1061998, Alresford Parish Council, 302	No	Alresford Parish Council has looked at your proposed modifications intently and has some observations and comments that they would like to make you aware of. 1. The lack of information regarding these modifications is concerning, another concrete crusher is apparently required which has not been stated on the paperwork. It is apparently to be positioned close to a residential garden (site 2). If this is the case why is it not possible to use the existing concrete crusher? 2. We are concerned about the amount of dust and inconvenience noise from the Crusher and the high pitched noise from Diggers and Lorries when reversing, especially for those residents that back on to Colchester Main Road. 3. Why was this location chosen, the council are perplexed at this as it is not a logical location there are other places this could be located. 4. If it is the case that the entrance and exit will be on to the B1027 we strongly object to it, due to the fact it is a very busy road and going by your map your drivers will be exiting and entering on a blind bend. 5. The whole situation needs a rethink. What have not been taken into consideration is ' People ' and their lives above their own Business Model. We have got to live and work together for 15 years on this project. Why can't we live in some	

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		sort of harmony? Overall the council objects to your proposed modifications.	
1061210, 411	No	<p>Thank you for your letter of notification dated 3 January 2017. (Your Ref RWLP/Modifications) I have lived in my present house for over 25 years in the knowledge that the field, your Site1 adjoining my garden, would one day become a gravel pit. I accepted this fact knowing that protest would be futile and that gravel has to come from somewhere. It wasn't until I received your letter and plan that I learned that it was highly likely that the a gravel processing plant .and an inert waste recycling plant was being proposed for the field shown as Site 2. I get the impression that this is to make it more convenient, and thus economic, for the operators by not having to use the existing Wivenhoe site. This was a bit of a bombshell as it means that we are now highly likely to be seriously affected by noise and dust generated at this Site 2.(We are on the leeward side of the site) This would be detrimental to our quality of life and would detract from the value of our property. Screen planting and a bund would only hide the site from view it would not stop noise &amp; dust. I thus object to the proposed modification to the plan. Site 1 is large enough for the processing plants to be situated in the centre where intrusion into homes would be minimised by distance from the plant. One other point I would make. Site 2 is so close to the B1027 road that it would only be a matter of time before a very short haul road was pushed from Site 2 directly onto the B1027. How convenient for the contractors balance sheet and detrimental to users of this already accident prone</p>	

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		part of the road. Thank you for considering our views.	
1020371, Colchester Gospel Hall Trust, 450	No	This is my response to your current consultation. I object to your proposal for site 2 for the following reasons: - Backing on to residential property Noise Pollution Impact on outlook No plan provided of where machinery equipment will be located Lorries parked in approach road In addition, I consider the proposal incomplete due to lack of any information regarding a new access intended by Tarmac. Other comments:- General lack of awareness of the proposals in the neighbourhood Unwillingness to attend a site meeting in order to gain better first-hand knowledge of the site and the surroundings	
1063382, Tendring District Council, 485	Yes	Within modified Policy 3, The Council notes the proposed extension to the site at Sunnymead near Elmstead Marked. Within the Pre-Submission draft RWLP the site was previously proposed for inert landfill only, The extension to the site proposes Inert waste recycling in a new section to the northwest of that larger site previously identified. At modified Table 19 (Sunnymead Elmstead), an extension to the site is proposed, as detailed above. The table identifies the relative areas of the two sites which form the Sunnymead site. 63 hectares of inert landfill with continues to be proposed from the Pre-Submission draft RWLP, an additional 7 hectares of inert waste recycling is now also proposed. A new criterion to the landfill site (Site 1) requires 100m standoff from residential properties. For the inert recycling site (Site 2) two new bullet points have been added: - Bonding is required on north, east and south sides to	Given the above proposed modifications, TDC consider the Replacement Waste Local Plan Schedule of Modifications to be sound. TDC also recommends continues involvement of its members, land owners and town councils in the waste local plan process to ensure its deliverability.

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		<p>screen the site. - To demonstrate that it could not have an adverse effect on European sites through HRA. Most likely potential impacts would be caused by disturbance. These modifications appear to be acceptable in terms of protecting residents, the landscape and designated areas. The County Council is of course aware of the two large scale residential planning applications which have been approved recently. Both approvals were allowed at appeal and are relatively close to the proposed landfill site at Sunnymead. The development for the erection of 60 dwellings (APP/P1560/W/16/3149457) at land to the north of Cockaynes Lane Alresford was allowed on the 1st December 2016. On the south side of Cockaynes Lane a development for 145 dwellings (APP/P1560/W/15/3124746) was allowed on the 1st June 2015. The closest development to the landfill site is that to the north of Cockaynes Lane which is located some 230m to the southeast of the waste site.</p>	
1063440, Natural England, 504	No	<p>While we agree on the issues to be addressed for Site 2, this allocation should be subject to Habitats Regulations Assessment in order to demonstrate that it would not have an adverse effect on European sites. Therefore the modification added appears to be extraneous given the extant fourth bullet point "To demonstrate that it could not have an adverse effect on European sites through HRA ".</p>	

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604622, 517	No	<p>I am very concerned about a proposal that has come to my notice at the last minute M21 We have an excellent situation in Ardleigh (second reservoir works), with trucks accessing the A120/A12 junction without interference with domestic/personal lives. Safety first, I would say, and hope you agree. I have had a guided tour of the site in Ardleigh, and it is well planned for safety. I have had a good look at the proposals and plans for Alresford/Elmstead and my comments are as follows: - Lack of information well in advance of plan, this definitely is not acceptable for such a massive and long drawn out proposed operation for 17 years. Noise level from trucks and machines, also producing dust near residential property. Site 2 should not be utilised as to its proximity to residences. Heavy goods vehicles exiting on to a narrow dark spine main road between Colchester town (where we live and work) and villages east (where we often go). It's a catastrophe about to happen. Therefore I do not support this proposal and would like you to accept my objection as genuine.</p>	
1064243, Historic England, 529	No	<p>We welcome the requirement to investigate gravels for archaeological deposits as part of the Environmental Statement. Whilst Palaeolithic deposits are of significant interest in this part of the world and the policy wording is well intentioned, we have some concern that the policy would exclude similarly important archaeological remains from other periods of human activity. As written, the investigation would not be required to establish the potential for Mesolithic human activity for example, which we do not think is the intention of the Inspector. We strongly request</p>	

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		substituting Palaeolithic with archaeological, which would cover all periods of human activity.	
1064274, 532	No	I was very surprised to learn that the ECC are planning to extend the current recycling facility in Elmstead so as to encroach on numerous, at present undisturbed residential properties. This shows a distinct lack of consideration for others for the following reasons: 1. Information on the extent of the new facility has been very paltry and failed to make residents aware of the full scope of what is proposed. 2. The noise, dust and general disturbance will directly impact a number of residential properties. 3. The residents should not have to tolerate the consequential noise, dirt and loss of air quality associated with such an operation. 4. The access would appear to be off a blind bend and this will pose a serious hazard for other motorists. I therefore oppose the scheme in its current format and would ask the Council to go back to the drawing board and have a complete rethink in view presenting a scheme that considers for the neighbourhood and shows consideration for those that live in close proximity to the operation.	
1064276, 533	No	It concerns the extension of the recycling facilities in Arlesford/Elmstead and we would respond as follows. 1. Has any consideration been given to the residents of the Arlesford/Elmstead villages' just think how much dust and dirt the new proposal will cause especially for those with respiratory problems. 2. We understand there is a proposed new entrance to the site which is on a narrow main road this road is already	



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		<p>very dangerous with little or no lighting and very difficult in the dark and fog another entrance where you propose is just asking for a serious accident. 3. There would be more heavy goods vehicles on a country road which a lot of cyclists use and the noise level would be unacceptable near residential properties. 4. Site 2 is in total disregard of a house (newly done up) being right on their boundary this would totally devalue the house and the site would cause immense distress to the residents of it. 5. We are also surprised that this consideration was put forward with very little chance of the residents, etc. being able to respond; not knowing anything about it this is also a very bad practise. We would, therefore, be glad if you could re-consider your plans and we would like to say we do not support your proposals and really do object to what you have in mind. We trust you will look on our comments favourably and have some consideration for neighbours in the villages of Alresford and Elmstead and indeed the community as a whole.</p>	
1064282, 534	No	<p>Following my previous letter to you I have further considered this information that has been sent to me and I respond further as follows as it definitely affects many residents in Alresford and has much wider implications than my situation in Cockaynes Lane. The environmental bearing on residents must be taken into account in any of these proposals. My further comments are as follows: 1) I am very surprised at the lack of details being submitted in this proposal. It just seems to us as it is a foregone conclusion that this has to go ahead at any cost. 2) This site 2 that has suddenly appeared is in the most offensive position</p>	

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		<p>you can possible think of. Totally inconsiderate of adjacent residents and if it is in view of access to the B1057 it is just lunacy. This road is a night mare at all times and is just asking for further fatal accidents and congestion. I strongly oppose this as even if this whole site goes ahead there are many other areas that could be used for Recycling and using the same access to the site at Keelers Lane. If it takes longer for the lorries to do their job, TOO BAD. It is the inconvenience of the companies that are benefitting from this not the Residents.</p> <p>3) Further to this point Site 2 would create noise, dust, and other environmental issues for Residents and is totally unacceptable. 4) If the general proposal for this site goes ahead, we must have guarantees that the 250 Meter boundary between the site and all developments and Residential Property be secured legally. I would also recommend they reduce the Boundary of this site extensively. 5) For any proposal going forward there also needs to be guaranteed bunding to the perimeter of the site which needs to be grassed and evergreen hedges planted at the base of it. This must also be maintained properly at all times. COST of all this is not an issue, it is all part of the implementation of the proposal and is mandatory to be fair to the community. I submit these comments respectfully, but with urgency that this matter is adjusted to be fair to the local community of which we all have part in maintaining and being a welcomed area for other residents in the future.</p>	
1064294, 535	No	At this late hour I have just learnt about this unsolicited proposal, in deed due to lack of public awareness/consultation	

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		<p>the date for representations concerning the Modifications has been extended from Thursday 16th to Monday 20th February. I ask please: That due to lack of public awareness/consultation given by ECC to make sure the community is now given the chance for a fair hearing. That all plant and machinery access is kept at the present site off Keelers Lane. That modification Site Two behind Rosedene residential property is cancelled. That between Site One and all residential property and existing developments there is a 250 metre boundary made. That a maximum size embankment with established evergreen hedge around the circumference together with deciduous trees is put in place before commencement of the Site One project to provide an attractive landscape to shield from the works. That trucking routes are stipulated and adhered to. I would urge you to have the courage to re-think and terminate the Modifications proposal; have the implications, which would be obnoxious for the local residents, particularly for Rosedene, really been taken into account? I really wonder if ECC have made themselves familiar with the area, would any of them mind a Mineral/Recycling facility being placed on their door-step? Before the inspector issues her final report I appeal to her to visit/revisit Rosedene to see how physically near the property is to the proposed Modification Plans and the new access on the B1027, also that Rosedene is nearing completion of renovation which enhances the property and the area, whereas the said Modification Plans will be detrimental. The concerns of Alresford and Elmstead Parish Council are valid and need to be taken on. Although in a different context, as we are concerned with the</p>	

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		<p>effect on the local community rather than businesses, I thought I would finish of by including the following quote which seemed applicable: - 2/18/2017 Planning is Essential, Plans are Useless #FridayLessons minimoko</p> <p><a href="http://minimoko.com/planningisessentialplansareuselessfrida/1/1">http://minimoko.com/planningisessentialplansareuselessfrida/1/1</a></p> <p>December 3, 2010 0 PLANNING IS ESSENTIAL, PLANS ARE USELESS I remember vividly from my university days, when I was introduced to this concept. A similar quote has been attributed to both Winston Churchill and Dwight D. Eisenhower. Winston Churchill said that Plans are of little importance, but planning is essential. and Dwight Eisenhower said that In preparing for battle, I have always found that plans are useless but planning is indispensable. This lesson is something that I always keep in mind when preparing for the future. The important part is actually doing the plan, when it comes to executing it a lot of things will change that you cannot predict. The importance is that only through planning you will really understand what you are trying to do, how you will do it, what resources you will need, etc. Whether you are starting in business, or have already started you know how important planning is. You need to spend time to create a business plan, a marketing plan, operations plan and the list goes on. Of course in 2 years' time, you will probably be doing things differently than how you originally set out to do them, but you need to have something to begin with. So next time you set out to do something, create a plan. You might end up not using it, but the exercise of creating it will be of huge advantage.</p>	

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1064303, 537	No	<p>As a local resident I am concerned as to the apparent lack of awareness as to the implications of this mineral/recycling facility on the local community. There has been a lack of consultation from the Essex County Council and the detail as to the scheme surrounding site 2 and I feel that this should not go ahead without consideration for the residents neighbouring the site. I feel very strongly that;</p> <ol style="list-style-type: none"> <li>1. Access is kept at the present site off Keelers Lane for all plant and machinery.</li> <li>2. That a minimum of 250 metres boundary is made between the site and all developments including residential properties.</li> <li>3. That extensive bunding is put in place prior to works starting, and planted with substantial evergreen hedging around its base with some deciduous trees in the mix to provide an attractive landscape scene.</li> <li>4. That trucks are kept to defined routes.</li> <li>5. That the operator is responsible for with keeping mud and dust off the surrounding roads.</li> <li>6. That dust is damped down in dry weather.</li> </ol> <p>The proposed project will undoubtedly be a major inconvenience for the local community for many years, and the ECC have a responsibility to minimise this as much as possible.</p>	
1064366, 539	No	<p>I wish to make you aware of my strong objections to the above mentioned plan. These modifications entail levels of noise; dust and large plant traffic which far exceed what can be tolerated by the local community and will be a downgrading of the area. There will also be a worrying increase of road danger. I wish you to seriously address the following: - Do not allow access to B1027 Keep all plant &amp; machinery at present Keelers Lane site.</p>	

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		<p>Ensure a minimum 250m boundary from any other properties/sites. Put in place extensive bunding screened by substantial planting. Ensure trucking routes are defined &amp; enforced. Do not use the proposed site 2 to rear of Rosedene, a property recently undergone major extensive improvement. This site 2 Plan could not be reasonably tolerated by occupants of this property. I would add that ECC have been behind in providing sufficient &amp; timely awareness of these plans and it is essential that they now re-consider before proceeding any further.</p>	
1064384, 542	No	<p>My involvement with the proposed landfill and aggregate extraction is twofold; Firstly, the Bradshaw's moved from suburban London around the early 80s, and Ross was born in 94, soon to become closely knit with our six children. Moving on, he now has a considerable investment in an attractive property, on the very edge of your proposals. Secondly, whilst employed in ready mix concrete for 27 years, I supplemented my income by preparing schematics of plants, silos, wash-out pits, and generator rooms etc. which in turn were used by the development manager, often successfully. The following three points we beg your careful consideration a) Working hours b) Stink and noise, and c) The impact of heavy traffic</p>	
1064672, 543	No	<p>It has come to my notice over the weekend that there is a proposal for a large scale mineral/recycling facility in Elmstead/Alresford. Why has this not been made clear to those of us resident in the area before this? I have had no</p>	

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		<p>communications from ECC at all, despite living in Elmstead. The lack of communication is upsetting. Looking at the plan, I cannot understand why Site 2 needs to be included as there is a huge amount of space in Site 1, which is unused. At the very least, plant and machinery should not be moved here, as Area 1 is more than sufficient. I feel strongly that this plant and machinery should be kept in its existing work area of Keelers Lane, as this is not impacting on any residents. In accordance to ECC rules, a minimum of 250mt must be kept between this type of site and any residents properties. To maintain this boundary is common courtesy to residents, and a screen of evergreen trees should be grown around its base to keep residents privacy and outlook, aside from the impact of noise and dust. As to the plan to have the access on the B1027, this is extremely dangerous. This is a blind bend on a busy road, and it makes no sense to endanger the public in this way. Trucking routes must be clearly defined and enforced; there is already an access to the site, why not simply use this one? To have slow moving lorries pulling out onto the B1027 on a blind bend is an accident waiting to happen. It seems to me that the whole plan has been badly thought out, and completely ignoring the views of the public whose lives will be actually impacted by the proposal. To deliberately move a stone crushing plant right next to a residential area is astounding, especially when there is an existing plant in use very closes by, and ample space in Site 1 to use if the plant really has to be relocated. As a resident, I would urge the council to rethink this proposal and come up with</p>	

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		a plan which takes note of ALL residents' points of view.	
1064674, Elmstead Parish Council, 544	No	The new site 2 within L(i)5 and W36 identified for inert waste recycling as a replacement for site W13 is not in an appropriate position within site 1, being close to residential and established business properties. The noise and air pollution is highly likely to impact on the health and wellbeing of those living and working in these properties. This amendment will also cause loss of amenity to the neighbouring property Rosedene. The 100m buffer zone proposed around the boundaries is less than the established agreed 250m. We are also concerned about the lack of information provided regarding traffic movements which would be generated, and feel it is imperative that the access road as shown on the plans is maintained as the only access to this site.	Site 2 should be moved to a different part of Site 1 so as to be as far as possible from residential and business properties, with a 250m buffer zone specified.
1064690, 546	No	I have lived in Elmstead Market for 12 years now but have only just become aware of your plans for a major large scale mineral/recycling operation in Sunnymead Farm close by. I find this lack of awareness quite perplexing especially as the size of the project is so large. In the light of what is immersing I would question whether the whole thing has been thoroughly thought through especially as regards its impact on the local scene and indeed the boroughs both of Tendring and Colchester. Also the time frame has gone up to 17 years from the original 8 as per M21 in your modification document. Knowing the area intimately and after having done some research into the matter, I would request that it is imperative that all plant and machinery and	



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		<p>access routes are kept where they currently are and a 250M boundary is placed between it and all residences prior to any works in accordance with established policy. Surely the proposal I notice - rear of Rosedene for instance, should not go ahead due to what would be substantial loss of amenity. Plentiful bunding and suitable planting must be in place around the whole of the perimeter prior to works starting. Additional truck routes and movement would need controlling "currently they run all over both boroughs some routes of which are left with copious deposits of mud right now "so what will an increase in site use generate "has any one looked at that? It would also be of utmost importance that clearly defined trucking routes are not only put in place but are controlled "currently they seem to go anywhere leaving extensive muddy tracks. Lastly the current access off Keelers Lane should be retained. In view of the very real concerns expressed I would suggest the project is parked and reassessed "I can't see any other way forward.</p>	
515360, 547	No	<p>I have become aware of a very large scale mineral/recycling facility in Sunnymead Farm close to where we live in Cockaynes Lane, Alresford. This is all very worrying due to the scale of its impact on neighbouring property. In particular it will include placement of screening, grading, and recycling equipment in the field now labelled as site 2 which has not been referred to before plus a new access onto the already busy B1027. All this is new and an additional time frame up to 17 years from the original 8 added in as well, as per M21 in your modification document. There seems to have been a great lack in the</p>	

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		<p>consultation process with residents and others in the immediate area. Not even parish and district councillors being in the know. The first plea would be that all plant and machinery and access routes are kept where they currently are using the current Keelers Lane access. Surely the site 2 at the rear of Rosedene should not be used- immediately behind a new substantial family residential property. Secondly that a 250m boundary is made between the site and all residential property around its perimeter in accordance with established County Council policy. Thirdly that extensive bunding, with appropriate planting is put in place prior to works starting. Fourthly it would also be of utmost importance that clearly defined trucking routes are not only put in place but are controlled currently they seem to go anywhere leaving extensive muddy tracks. Lastly the current access off Keelers Lane should be retained. I would suggest the whole proposal needs reassessment.</p>	
1064724, 548	No	<p>Regarding the above mentioned amendment application please consider the following concerns very carefully; The B1027 is a fast, busy road and already heavily used for construction traffic it would be totally unsustainable for the road to cope with any further entrances for such a huge proposal. The locals residents are hardly even aware of the amendment proposed a well-advertised public meeting should have been offered by ECC to all affected residents. The proposal is unreasonably close to residential properties there should be at least a clear 250m boundary created between any residential property and the proposed site it will have a massive impact on the resident's</p>	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M21?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		quality of life. I strongly object to the amendment and believe that TDC should do all they can to protect the area and refuse the application.	
1064733, 549	No	<p>I write regarding the proposed M21 modification to the ECC Joint Replacement Waste Plan. Having studied the amended plan carefully, my concerns are the following: Site access there should be no extra site entrances off the B1027 this is already a busy, fast road and is a main route to popular coastal towns. Site entrances of this nature are busy, dirty and unsightly do TDC/ECC want to attract tourists or deter them? Solution keep all site access in Keelers Lane at its present site. Location the proposal is far, far too close to residential properties both on B1027 and the edge of Alresford town. Solution remove site 2 off the plan altogether and create at least a 250m boundary away from the road, plus any other residential boundary. This boundary must be extensively bunded and well screened with evergreen vegetation to provide all year round screening.</p> <p>Awareness ECC have been very remiss in creating awareness to the affected residents surrounding the proposal. They need to seriously consider the impact it will have on the local resident's lives, along with the house values, not to mention enduring the traffic, noise and dust for a long period of time. Please can TDC do all they can to refuse the proposed amendment?</p>	
1064753, 550	No	Firstly the lack of information provided for public awareness is of great concern. I object to the site proposed as it would back on to residential gardens (Site 2) and would request that the	

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		<p>present site off Keelers Lane be used or that it could be located elsewhere. Also of concern is the dust and noise that will arise from the Crusher, Lorries and Diggers especially to the surrounding residents. The B1027 is a busy road and it would seem that the Entrance/Exit would create a dangerous situation. If used, then a 250m boundary be made with suitable evergreen landscape to act as a screen. Finally, an appeal that the people are closely concerned be considered and that the whole situation be reviewed.</p>	
1064756, 551	No	<p>Thank you for agreeing an extension to the consultation to allow further comment, and I hope you can get this included too. I have relatives with property directly affected by the proposals and therefore my enjoyment of their amenities! Some brief comments on the amended proposals: Communication and Community awareness: I have seen the letter sent out 3 January 2017 to neighbouring properties and the communication has been very poor to say the least. Very little information is provided in the letter as to what the intended amendments involve. It requires quite a bit of digging around the ECC website and a fair understanding of planning procedures and terminology to discover what is actually involved. This should have been spelt out in simple English including the new access and the type of machinery and operations being proposed especially for site 2. Protection of resident's amenity is a massive planning consideration, and I do not feel the suggested proposals provide this. Site 2 where the recycling plant is proposed is too close to the rear of residents. Harm to</p>	

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		<p>amenity includes noise of vehicles (reversing beepers, crushers, general construction noise), loss of air quality from the dust raised, and enjoyment of a green outlook and feeling of openness. The proposed new access on the B1027 apart from the obvious highways problems associated with being very close to a blind bend, is also harmful to the amenity of nearby houses with the noise of extra lorry movements and muddy roads. To mitigate the above, I strongly request the following: Site 2 is not included in the scheme. All plant and machinery to be kept at present location. A minimum distance of 250metres is kept between the site and all residential properties with proper bunding, substantial evergreen hedge planting in place and other attractive plants to give an attractive landscape scene Current access to be kept and no new access point on the B1027. I trust these comments and suggestions are accepted and the amendments are given the needed changes to make them acceptable to the local and wider community.</p>	
1064771, 552	No	<p>This new proposal comes as a shock not knowing the project beforehand and object strongly to this proposal. To have to live through this for an extended period of 17 years is bad enough. The impact on residences bordering sites 1&amp;2 should be stated clearly. Clunky, whining and revving of machinery and dust which finds its way into every crevice all add up to a lower quality of life. This project would devalue properties bordering the site. The entrance to the site (viewing the map) only seems possible on the bend of a busy road. Clearly too little consideration has been given to the residents. A continuous</p>	

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		beam of soil with plantings of shrubs and trees would reduce noise and dust.	
1064779, 553	No	I apologise for sending this in late, but hope that you will listen and sympathise with my concerns relating to the above named project. The reason for raising my concerns is not because I live close by, but because 1) I use the B1027 very regularly and am concerned about the proposed new entrance in/out of the site and 2) it is completely unreasonable to expect someone to live next door to a recycling plant with concrete crushing machinery. When we send in notes like this it feels like they disappear into oblivion, and cannot be sure that they even get read or taken note of but would sincerely hope that you will consider this and ask yourself the question would I be happy for a recycling centre with heavy, noisy machinery to be placed next door to my house? Please can you reconsider your proposal and for the lives of the residents that will be directly affected.	
1064785, 554	No	I am writing to you regarding the above proposal. We understand that you are under pressure to provide for the future needs of the region. That said, I am surprised at the lack of publicity regarding application especially as it has a large impact on those who live in the immediate area, and in the light of that I would sincerely ask that you respect and consider the view and requests of the neighbours. Having used B1027 for many years, and I am surprised that you would even consider a new entrance in the particular location suggested. This section of the B1027 is extremely dangerous as it is on a small hill and blind	

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		<p>bend. I would therefore request that the existing access off Keelars Lane be retained as the main access for all plant, machinery and vehicular access. This access has been used for many years and will have minimum impact on traffic and residents. Site 2 of the proposed plan, would have significant impact on the houses that border on this portion of the site. The social impact will be significant caused by the noise, dust and vibration which could cause health issues and potential damage to the structure of the neighbouring property. There would also be a financial impact caused by the devaluing of property because of impact of the proposed use. Therefore from a neighbourly perspective would sincerely recommend that part 2 of the application doesn't go ahead. In view of minimising the impact to residents adjacent to the site can we ask that a 250m boundary between the back of these properties and site 1 along with extensive bunding be specifically mentioned in any planning conditions? The bunding should be at the widest possible width prior to works starting. This bunding must have a substantial evergreen hedge planted around its base with some deciduous trees in the mix to provide an attractive landscape scene. Finally the impact of additional road movements will have a significant impact on the area, and therefore I would ask that any routes and restrictions made should be enforced. Again I would ask that these points are considered and reflected in any plan that you decide to go forward with.</p>	

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1064790, 555	No	<p>I understand the consultation re these pits etc. is now closed, but Cllr Carlo Guglielmi has assured me that it is still open to Monday February 20th for the Elmstead parish council, and also for me as the district councillor for Elmstead Market. If the proposed recycling plant with a concrete crusher is allowed to be built on Site 2 at Sunnymead, which is right behind houses, the amenity of these residents will be severely disrupted. This will be due to the noise, the dust and the aerial spraying, which will be used to try to keep the dust under control. This is just not acceptable as the lives of the families who live there will be made complete hell. There is no information about traffic movements. I understand that Tarmac wants to move the access to this site near to Englishes Farm on the B1027 in front of the proposed Site 2. This is also not acceptable, especially as this will now include lorries carrying recycling materials. The access to the site should stay where it currently is at Keelers Lane. I drove along the B1027 past Keelers Lane last week and noticed all the sand and gravel lorries leaving at this exit. The road on the left hand side was simply covered in thick mud for a considerable distance, because the majority of these lorries left the site and turned towards Colchester. This mud covering of the road was to the extent it could be dangerous if traffic needed to stop suddenly, and could cause an accident. Why would it be sensible to spread this mud which is constantly on the road further on, and also disrupt the lives of people living near Englishes Farm? On the map I have seen it appears to show that the when the lorries drive into the current sand and gravel pit using Keelers Lane, they then turn to the east to get into the</p>	



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		<p>pit half way down this lane. It would be perfectly easy I would have thought to extend this access into the proposed Site 1. The recycling plant should then be in this area or further south into the pit. I understand the proposed new Site 2 pit is going to be only 100 metres from the back of the houses on the B1027. This is not right as it was originally proposed by ECC that all such pits should be 250 metres from houses at least. There should also be a wide band of planting including evergreen planting, with a substantial high bund as well. The planting should not be on top of the bund as this always dies. There is already an example of this happening in Elmstead Market on the bund surrounding Whitings scrap metal yard. I hope ECC will reconsider the plan to put the recycling plant in Site 2 and also to move the access to the sites to the area of Englishes Farm.</p>	

**Modification M22 – Wivenhoe Quarry Plant Area**

No Comments Received

## Modification M23 – Dollymans Farm

Person ID, Organisation, Comment ID	Do you agree with proposed modification M23?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
735401, Basildon Borough Council, 138	No	The Council objects to Modification 23 and the linked Modifications 1 and 5(4) as set out on page 77, which concern Land at Dollymans Farm, Wickford/Rawreth. The Council has held a long standing position against the creation of new and/or expanded waste management facilities in the Basildon Borough. It does not accept that further waste related development should be accommodated in the Borough as a matter of principle, and that the rest of Essex and Southend on Sea should accommodate a greater share of waste development needs in the future.	Dollymans Farm should not be allocated for any waste related development or land use in the Replacement Waste Local Plan.
735401, Basildon Borough Council, 139	No	<p>If however the Planning Inspector continues to be minded that the site at Dollymans Farm continues to offer a suitable location for inert waste disposal, the Council would seek the following changes to the Plan policies to address how the site operates and how its traffic movements could otherwise affect local communities through additional HGV movements through Wickford.</p> <p>Object to Table XX Appendix 18 and description Access Via private road adjoining A130 Reason: This is misleading as Doublegate Lane (the private road) does not adjoin the A130, rather it terminates at a junction with the A129.</p>	The table should be reworded to state: Access via Doublegate Lane, off A129.
735401, Basildon Borough	No	If however the Planning Inspector continues to be minded that the site at Dollymans Farm continues to offer a suitable location for inert waste disposal, the Council would seek the following	The policy should be reworded to state: All HGV access into the site should be from the A129, via the A1245.

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Council, 140		<p>changes to the JRWLP policies to address how the site operates and how its traffic movements could otherwise affect local communities through additional HGV movements through Wickford.</p> <p>Objection to All access should be via the A129. Reason: Given highway capacity issues currently experienced in Wickford and Shotgate and to provide policy assurance that residential amenity in Wickford and Shotgate will be protected from the passage of HGVs using the site, the policy should stipulate instead, that access will be via the A1245/A129, preventing HGV access from the west.</p>	
735401, Basildon Borough Council, 141	No	<p>If however the Planning Inspector continues to be minded that the site at Dollymans Farm continues to offer a suitable location for inert waste disposal, the Council would seek the following changes to the JRWLP policies to address how the site operates and how its traffic movements could otherwise affect local communities through additional HGV movements through Wickford.</p> <p>Objection to Restoration of the site through this allocation provides the opportunity for biodiversity, landscape and visual enhancement. Reason: Does not reflect historical monument value.</p>	The policy should be reworded to state: Restoration of the site through this allocation provides the opportunity for biodiversity, landscape and visual enhancement and historic asset preservation.
735401, Basildon Borough	No	If however the Planning Inspector continues to be minded that the site at Dollymans Farm continues to offer a suitable location for inert waste disposal, the Council would seek the following	Reword to say Retain trees and shrubs to screen plant and materials from the vantage points of the A130 and railway line. Consider additional planting and bunding,

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Council, 142		<p>changes to the JRWLP policies to address how the site operates and how its traffic movements could otherwise affect local communities through additional HGV movements through Wickford.</p> <p>Objection to Retain trees and shrubs to screen plant and materials from the road. Consider new planting and bunding to screen views into the site. Reason: this needs strengthening to ensure any new planting and bunding, screens views into the site, prior to the landfill operation commencing to mitigate visual amenity as far as possible.</p>	prior to commencement of development, where existing vegetation is not adequate.
735401, Basildon Borough Council, 151	No	<p>In respects of evidence collated for the emerging Basildon Borough Local Plan. from a historic perspective, the Basildon Borough Historic Environment Characterisation Assessment 2014 <a href="http://www.basildon.gov.uk/article/4946/Evidence-Base---Design-and-Historic-Context">http://www.basildon.gov.uk/article/4946/Evidence-Base---Design-and-Historic-Context</a> does not reveal anything of particular interest, except the WWII monuments, which need safeguarding in situ given they are not statutorily protected, but are part of the cultural history of the Borough and are of local value.</p>	Additional wording should be added to the policy to conserve the monuments. See Comment ID: 141 for suggested wording.
735401, Basildon Borough Council, 153	No	<p>The Council can confirm that the element of the site in the Basildon Borough is not part of a Critical Drainage Area for the management of surface water flooding, as set out in the South Essex Surface Water Management Plan 2012 <a href="http://www.basildon.gov.uk/CHttpHandler.ashx?id=5316&amp;p=0">http://www.basildon.gov.uk/CHttpHandler.ashx?id=5316&amp;p=0</a> , but that the watercourse to the west of the site is identified as a</p>	Must ensure that in accordance with national policy, the correct flood risk criteria are included in the allocations policy to enable adequate flood risk mitigation during the sites detailed planning stage and operation.

Person ID, Organisation, Comment ID	Do you agree with proposed modification M23?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>Critical Ordinary Watercourse in the South Essex Strategic Flood Risk Assessment</p> <p><a href="http://www.basildon.gov.uk/article/4947/Evidence-Base---Water-Cycle-Flood-Risk-and-Surface-Water-Management">http://www.basildon.gov.uk/article/4947/Evidence-Base---Water-Cycle-Flood-Risk-and-Surface-Water-Management</a></p>	
735401, Basildon Borough Council, 154	No	<p>The element of the site in the Basildon Borough has been evaluated as part of the Green Belt Landscape Capacity Study 2014 <a href="http://www.basildon.gov.uk/article/4948/Evidence-Base---Landscape-and-Green-Belt">http://www.basildon.gov.uk/article/4948/Evidence-Base---Landscape-and-Green-Belt</a> to determine if it has any capacity to accommodate any development; alongside a the Basildon Borough Green Belt Study 2015 <a href="http://www.basildon.gov.uk/article/4948/Evidence-Base---Landscape-and-Green-Belt">http://www.basildon.gov.uk/article/4948/Evidence-Base---Landscape-and-Green-Belt</a> which has reviewed whether it continued to fulfil any of the purposes of the Green Belt. The former considered it to have low capacity for development given its role in helping to prevent the coalescence of Wickford and Thundersley and given it formed an important role as part of a strategic green corridor connecting the Thames Estuary Marshlands to the south, with the Crouch and Roach Estuaries to the north east. It also noted that the qualities of the area for safeguarding in the future included the mature vegetation along the railway line and watercourse, the rural landscape character and the WWII local monuments north of the railway line. In addition, there are recommendations to improve the public rights of way in the area.</p>	<p>Provisions should be incorporated into the allocations policy that adequately protect the mature vegetation along the railway line and watercourse, the rural landscape character and the WWII local monuments north of the railway line; as well as assist in making improvements to the public rights of way in the area.</p>

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487944, Rochford District Council, 80	Yes	<p>Rochford District Council would firstly like to take this opportunity to thank Essex County Council and Southend Borough Council for the joint briefing session for Rochford District and Basildon Borough Members which took place on 4 January 2017. We would also like to thank you for the opportunity to respond to this further consultation. The Councils response focuses on the proposed allocation of Dollymans Farm on the borders of Rochford District and Basildon Borough for inert waste disposal i.e. for the landfilling of construction/demolition/excavation waste (predominantly Main Modifications 1, 5 and 23). It is noted that this site has been promoted for a number of years, and was subsequently assessed as part of the plan-making process but ruled out as it is allocated Green Belt land. It is also noted that the existing landscape in this location is as a result of its former use as a mineral extraction site, but it was not restored to its former character. There are a number of concerns that were raised by Rochford District Council Members at the briefing session, including impact on highways, flooding and pollution. These issues are considered in turn below.</p> <p>Highways The proposed Development Principles for Dollymans Farm would require that all access is from the A129. The A129 however is a significant stretch of road which provides a key route through the town of Rayleigh in Rochford District as well as Wickford in Basildon Borough. Any additional traffic movements arising from this site, should it be allocated, should not go through any residential areas particularly Rayleigh. It would be preferable for traffic to access the site via the A129 from the A1245 (providing access from the north and south of the County). Although</p>	

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		<p>reference is made to a Transport Assessment in the proposed Development Principles for Dollymans Farm, further consideration should be given to the extent of the A129 itself. Specific reference should also be made to junction improvements as there are concerns about enabling vehicles turning right to safely exit the site onto the A129 given the current speed limit in this location. It should be noted that in Basildon's draft Local Plan (2016) Basildon Borough Council proposed a new road to connect the A127 with the A130, which would extend into Rochford District in close proximity to the proposed allocation at Dollymans Farm. Whilst this is the case, it should be noted that this proposal for a new road is not within Rochford District Councils current local development plan, and discussions with Basildon Borough Council on this and other strategic issues are ongoing as part of the Duty to Co-operate. Furthermore Essex County Councils Transport Strategy and Engagement Officers have advised that any new road in this location would not extend into the proposed allocation at Dollymans Farm. Flooding At the Member briefing on 4 January 2017 Rochford District Council Members raised the issue of flooding, and the potential option of using the low lying area at Dollymans Farm (the area identified for landfill) for storing surface water from the Fair Glen junction on the A127 to the south east of Dollymans Farm. Essex County Councils Transport Strategy and Engagement Officers, however, have advised that this would not be a suitable location for storing surface water from this junction as significant costs would be incurred piping the water such a distance, and there are more suitable sites</p>	

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		<p>being explored nearer to the Fair Glen junction. Options have also been tested around Rawreth Brook (and North Benfleet Brook) to the north / north east of the proposed allocation at Dollymans Farm to alleviate flooding in this area. The proposed allocation however does not form part of the potential flood alleviation scheme for this watercourse (appended to this response). Part of the proposed allocation is also within flood zone 3, and the site assessment for Dollymans Farm notes that the Sequential and Exceptions Test would need to be demonstrated. The flood zone element should be acknowledged within the proposed Development Principles for Dollymans Farm and appropriate flood mitigation measures required, as necessary, to protect properties further up/downstream. Pollution</p> <p>The Councils Environmental Health Officer has highlighted the key issues in relation to pollution should this site be allocated for inert waste disposal: Air quality issues as a result of additional traffic movement to/from the site There are no particular concerns in this regard from an environmental health perspective, provided that an appropriate traffic management plan is agreed at the planning application stage, and implemented. This should include sheeting vehicles and wheel-washing. Air quality issues (specifically dust) as a result of inert waste disposal The prevailing south westerly wind could disperse dust towards residential properties over 250 metres from the site. An Environment Agency permit would need to be sought for this site in addition to applying to Essex County Council for planning permission, which would consider this issue and require appropriate mitigation measures, if granted. The</p>	



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		<p>reference to dust mitigation measures and limits on duration (hours of operation) in the proposed Development Principles for Dollymans Farm is therefore welcomed. Noise issues as a result of inert waste disposal Due to the prevailing south westerly wind, noise could be an issue affecting nearby properties although it is noted that there are few residences in close proximity to the site. The potential impact on those further away from the site, and nearby businesses, should be carefully considered, for example along the A129 between the Carpenters Arms roundabout and the A130. The reference to noise standards and limits on duration (hours of operation) in the proposed Development Principles for Dollymans Farm is welcomed. However this could be strengthened to specifically refer to monitoring and noise mitigation measures such as bunds, if appropriate. Lighting issues as a result of operations on the site An appropriate lighting scheme would need to be agreed and implemented as part of the planning permission for this site, if allocated. This consideration should be included in the proposed Development Principles for Dollymans Farm. Other considerations The reference to archaeology and, in particular, the sensitivity around the war memorials on the site is welcomed. It should be noted that a Gypsy and Traveller site has been allocated in the Councils Allocations Plan (2014) at Michelins Farm, Rayleigh, which could potentially be within 450 metres of site when delivered. Conclusion On balance Rochford District Council does not have any overriding objections to the allocation of this site; provided that the Inspector is satisfied that adequate mitigation measures can be applied at the planning application/</p>	

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		Environment Agency permit stage. SEE ATTACHED - Rawreth Brook Flood Alleviation Feasibility Study (July 2016).	
1055067, 4	No	<p>The Dollymans farm site is Green Belt Land and as such was not allocated at pre-submission stage. The reasons given for changing this to 'allocated' are not convincing. This area of green belt is in a densely populated area and extensively used for leisure activities such as walking and horse-riding. It should be protected and removed from the plan. Please note that the Dollymans farm area is heavily used for leisure by walkers, dog walkers and horse riders. It has several Bridleways (BWs) running through it and comprises a locally unique circuit regularly used by horse riders in the area. This circuit includes the Pegasus crossing that we use to cross the A129, we then ride along BW 17 past Dollymans farm, and along BW55 (Doublegate Lane) to Rawreth Barns and across the Rawreth Barn Bridge over the A130 back to cross the A129. The proposed temporary road divides BW 17 from BW55 and would have to be crossed by walkers and riders to enable them to use this circuit of Bridleways that we use daily to avoid the busy roads that circle the area. The hazard and noise of the many and regular heavy trucks filled with waste that would be using the temporary road and the increased heavy traffic on the A129 and the turn off from the A129 (very close to the Pegasus crossing that we use) would make the route very unpleasant and hazardous for walkers and totally unsuitable for riding safely. We could not disagree more</p>	Change the Dollymans farm site from allocated back to non-allocated

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		<p>with the landowners comments on the pre-submission consultation on the waste local plan (2016) that the site is of poor quality, particularly in terms of visual amenity. We also take issue with the LVIA conducted by Liz Lake Associates that states; The existing landscape amenity of the Site has been assessed to offer a Limited to Negative contribution to the Local Landscape Character of the District. As one of the people who use and love the countryside that is affected by this proposed site we beg to differ. We do not have the means to employ consultants to produce reports in our favour but we do actually use the land in our day to day lives. For us, this is an attractive and hugely valued oasis where we can ride safely and enjoy the countryside in a local area that offers little other access to green fields and BWs for horse riding. It may not be on a par with Cumbria but it is of no less value to the local people who use it to escape the urban areas that surround it. Its despoilment by this proposed waste facility would be an enormous loss to the community. It is also stated in the landowners comments on the pre-submission document 2016 that: The allocation of Dollymans Farm would not compromise the objectives of the Green Belt and in the medium to long term once restored would likely result in an improvement to the landscape character. This indicates that the area would actually be improved by this proposed use but this is highly unlikely. It seems to my friends and I that once this Green Belt land is allocated then it is likely to be the thin end of the wedge. Evidence of this is clear in the statements from the report below. The attached Site Layout Plan is indicative of the areas of the site proposed for the respective uses. However, the</p>	

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		<p>landowners have indicated that they are amenable to increasing the amount of inert landfill subject to Essex County Councils requirements, and would also be willing to consider accommodating other waste streams to include non-inert and non-hazardous waste. In addition, while the proposed use of the site is for waste transfer and inert landfill, the landowners are willing to take a flexible approach to prospective uses and to discuss the possibility of locating alternative or additional waste facilities on the site including composting, recycling and energy from waste uses. The landowners and Strutt &amp; Parker would be more than happy to enter into discussions with Essex County Council in this regard. Importantly the following statement is telling: If an allocation for the site for a waste use is forthcoming, we intend to enter into detailed discussions with a number of interested operators in the area. This Green Belt land would not be safe and is highly unlikely to be restored to us. The report goes on to state: The proximity of the site to the Shenfield to Southend Victoria line, which forms the southern boundary of the site and links directly to London Liverpool Street, could also provide the opportunity for a siding off of the railway line as part of a future waste development on the site, and allow for the importation of waste from London. This does not sound to us as if the area would ever be returned to, by local standards, a quiet place to walk and ride and enjoy access to the countryside. Allocating this site in this plan and allowing a breach of the Green Belt here would, in the short, medium and long term ruin an area well-loved and utilised by the community and set a precedent for the future that we fear. This site is not some kind of</p>	

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		ugly deserted piece of land. It is highly valued Green Belt and needs your protection. Please restore it to its previous non-allocated status.	
923962, Northumbrian Water Property Solutions, 7	Unrelated	Having examined our records, we can confirm that Northumbrian Water (which covers both Northumbrian Water and Essex & Suffolk Water) has no owned assets within the search area of your enquiry detailed in the reference/location provided.	
923598, GTC Plant Enquiry Service, 8	Unrelated	Thank you for your enquiry concerning apparatus in the vicinity of your proposed work. GTC can confirm that we have no apparatus in the vicinity but please note that other asset owners may have and ensure all utility owners have been consulted.	
978664, Energetics Design & Build, 10	Unrelated	Based on the information provided, I can confirm that Energetics does not have any plant within the area(s) specified in your request.	
1057600, 17	No	I am writing to object to the Dollymans site being used for a waste disposal site. I stable my horse at Rawreth Equestrian in Church Road, Rawreth. I regularly ride my horse and walk my dog with my daughter and friends through the bridleways that run through this site. I am concerned that the new road and waste disposal site would render them effectively unusable for horses. Please note that the Dollymans farm area is heavily used for	

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		<p>leisure by walkers, dog walkers and horse riders. It has several Bridleways (BWs) running through it and comprises a locally unique circuit regularly used by horse riders in the area. This circuit includes the Pegasus crossing that we use to cross the A 129, we then ride along BW 17 past Dollymans farm, and along BW55 (Doublegate Lane) to Rawreth Barns and across the Rawreth Barn Bridge over the A130 back to cross the A129. The proposed temporary road divides BW 17 from BW55 and would have to be crossed by walkers and riders to enable them to use this circuit of Bridleways that we use daily to avoid the busy roads that circle the area. The hazard and noise of the many and regular heavy trucks filled with waste that would be using the temporary road and the increased heavy traffic on the A129 and the turn off from the A129 (very close to the Pegasus crossing that we use) would make the route very unpleasant and hazardous for walkers and totally unsuitable for riding safely. We could not disagree more with the landowners comments on the pre-submission consultation on the waste local plan (2016) that the site is of poor quality, particularly in terms of visual amenity. We also take issue with the LVIA conducted by Liz Lake Associates that states; The existing landscape amenity of the Site has been assessed to offer a Limited to Negative contribution to the Local Landscape Character of the District. As one of the people who use and love the countryside that is affected by this proposed site we beg to differ. We do not have the means to employ consultants to produce reports in our favour but we do actually use the land in our day to day lives. For us, this is an attractive and hugely valued oasis where we can</p>	

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		<p>ride safely and enjoy the countryside in a local area that offers little other access to green fields and BWs for horse riding. It may not be on a par with Cumbria but it is of no less value to the local people who use it to escape the urban areas that surround it. Its despoilment by this proposed waste facility would be an enormous loss to the community. It is also stated in the landowners comments on the pre-submission document 2016 that: The allocation of Dollymans Farm would not compromise the objectives of the Green Belt and in the medium to long term once restored would likely result in an improvement to the landscape character. This indicates that the area would actually be improved by this proposed use but this is highly unlikely. It seems to my friends and I that once this Green Belt land is allocated then it is likely to be the thin end of the wedge. Evidence of this is clear in the statements from the report below. The attached Site Layout Plan is indicative of the areas of the site proposed for the respective uses. However, the landowners have indicated that they are amenable to increasing the amount of inert landfill subject to Essex County Councils requirements, and would also be willing to consider accommodating other waste streams to include non-inert and non-hazardous waste. In addition, while the proposed use of the site is for waste transfer and inert landfill, the landowners are willing to take a flexible approach to prospective uses and to discuss the possibility of locating alternative or additional waste facilities on the site including composting, recycling and energy from waste uses. The landowners and Strutt &amp; Parker would be more than happy to enter into discussions with Essex County Council in this</p>	

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		<p>regard. Importantly the following statement is telling: If an allocation for the site for a waste use is forthcoming, we intend to enter into detailed discussions with a number of interested operators in the area. This Green Belt land would not be safe and is highly unlikely to be restored to us. The report goes on to state: The proximity of the site to the Shenfield to Southend Victoria line, which forms the southern boundary of the site and links directly to London Liverpool Street, could also provide the opportunity for a siding off of the railway line as part of a future waste development on the site, and allow for the importation of waste from London. This does not sound to us as if the area would ever be returned to, by local standards, a quiet place to walk and ride and enjoy access to the countryside. Allocating this site in this plan and allowing a breach of the Green Belt here would, in the short, medium and long term ruin an area well-loved and utilised by the community and set a precedent for the future that we fear. This site is not some kind of ugly deserted piece of land. It is highly valued Green Belt and needs your protection. Please restore it to its previous non- allocated status.</p>	
1057643, 22	No	<p>I wish to lodge my objection to the above modification to include Dollymans farm as a possible site for a waste dump. I object to the use of this Green Belt land for this purpose and believe the development of the site in this way is inappropriate. I like many others value this Green Belt land immensely. My three horses reside on this plot of land, and I hack around the land frequently, my 4 and 6 year old nieces ride their pony around the farmland and along the bridleways, I also walk my dogs on the land</p>	



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		<p>too. We already have a lot of lorries and buses to contend with whilst out riding, and the dangers will only increase with further inflow of traffic and lorries. I enjoy the green view and it is one of the few places in the local area where I can access the countryside and walk and ride safely. The development requires a new road and all the dirt noise and disruption that this would bring to this relatively peaceful area. Once the land is allocated for waste I do not believe it will be restored to its current green use. We have little enough access to the countryside in this built up area so please, please protect this area.</p>	
1057854, River Crouch Conservation Trust, 26	No	<p>I and other members are very concerned and against this application, for the following reasons: Right at the south west corner of the pit runs the upper part of The Chichester Brook, which connects to the Rawreth Brook under Church Road Bridge, which in turn runs straight into the River Crouch. There is a very strong risk that toxic substances will leak into this watercourse over time, even the smallest possibility is a NO! Indications will show the source very quickly. The River Crouch at this junction is tidal so both upstream and downstream would be affected. At the start of Brandy Hole there are large areas of clam and mussel beds which are farmed and sold to the public. Our main function of The River Crouch Conservation Society is to clean, preserve and protect the river and its wildlife which is thriving. I have prosecuted, many times, successfully, against pollution, even in The Royal Courts of justice. We really do not want to do this again! We are passionate about preserving The River Crouch, please visit our website,</p>	

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		<a href="http://www.rivercrouchconservationtrust.org.uk">www.rivercrouchconservationtrust.org.uk</a> See attachment - 'Map of Dollymans - district boundaries'	
1715, Rayleigh Town Council, 28	No	I am writing on behalf of Rayleigh Town Council regarding the above mentioned consultation. Rayleigh Town Council members supports Essex County Council's objections on the following grounds: Flooding Increased heavy traffic on local roads The need to conduct management of these heavy vehicles regarding mud and debris on local roads and to ensure specified routes are followed Inappropriate use of Green Belt Land. Our Town Cllrs are due to attend your Parishes meeting on 6th February 2017 and I will contact you again if further comments need to be made.	
924142, National Grid, 30	Unrelated	Part 1 Assessment - Affected Apparatus The National Grid apparatus that has been identified as being in the vicinity of your proposed works is: Electricity Transmission overhead lines Above ground electricity sites and installations We have assessed your enquiry and are writing to let you know that you can proceed using normal safe systems of work. See attached - National Grid letters and maps	
924142, National Grid, 31	Unrelated	Part 2 Assessment - Affected Apparatus The National Grid apparatus that has been identified as being in the vicinity of your proposed works is: Electricity Transmission overhead lines Above ground electricity sites and installations We have assessed your enquiry and are writing to let you know that you can proceed using normal safe systems of work. See attached -	

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		National Grid letters and maps	
1058260, 34	No	<p>I wish to lodge my objection to the above modification to include Dollymans Farm as a possible site for a waste dump. I object to the use of this Green Belt land for this purpose and believe the development of the site in this way is inappropriate. I like many others value this Green Belt land and walk my dog and ride my horse in the area and along the bridleways. I enjoy the green view and it is one of the few places in the local area where I can access the countryside and walk and ride in safety. The development requires a new road and all the dirt, noise and disruption that this would bring to this relatively peaceful area. Once the land is allocated for waste I do not believe it will be restored to its current green use. We have little enough access to the countryside in this built up area so please protect this area.</p>	

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1058259, 35	No	<p>I wish to lodge my objection to the above modification to include Dollymans Farm as a possible site for a waste dump. I object to the use of this Green Belt land for this purpose and believe the development of the site in this way is inappropriate. I like many others value this Green Belt land and walk my dog and ride my horse in the area and along the bridleways. I enjoy the green view and it is one of the few places in the local area where I can access the countryside and walk and ride in safety. The development requires a new road and all the dirt, noise and disruption that this would bring to this relatively peaceful area. Once the land is allocated for waste I do not believe it will be restored to its current green use. We have little enough access to the countryside in this built up area so please protect this area.</p>	
1059688, Rawreth Parish Council, 49	No	<p>Rawreth Parish Council have many concerns regarding the inclusion of land at Dollymans Farm in the plan being prepared by Essex County Council and Southend Council for waste disposal up to 2032. Council note, having read the consultation documents the fact that the site was not originally included in the prepared plan and they believe this should stand, Council base this decision on the following facts. A plan was prepared by Essex County Council in 2016, it included 18 sites allocated for waste disposal, other sites were looked at one of which was Dollymans Farm however, it was decided not to include this site as it lies within the Greenbelt. This decision was questioned by the landowner who made representations as to why they thought part of their land should be used for the disposal of inert material</p>	

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		<p>from construction sites. Subsequently and following the landowners representations the prepared plan has been examined by a government inspector who is concerned about a probable lack of capacity for the disposing of construction waste from 2026 -2032 and as such agreed that the site should be included and that the plan was unsound without it. One of the reasons given by the inspector is that there is an unfilled hollow left when earth was removed for building the A130, therefore the land wouldn't be raised above its previous level. Rawreth Parish Council feel there are more sound reasons to exclude it from the plan than there are to include it. The land at Dollymans Farm is all that remains of a very thin slither of green belt between Shotgate and westward creeping Rayleigh. Council believe the decision to ignore this fact may have been influenced by comments and reports commissioned by the landowner where it is stated that the fact that the land lies within the Greenbelt should not be a considered as relevant, the owner further states in the pre-submission consultation on the waste local plan (2016) that the site is of poor quality, particularly in terms of visual amenity, in addition the LVIA conducted by Liz Lake Associates states, The existing landscape amenity of the site has been assessed to offer a limited to negative contribution to the local landscape character of the District. This area of Greenbelt land is used daily by walkers and horse riders, it offers an area of attractive open countryside where members of the public can walk and ride in safety, something that is limited in an area that offers little other access to green fields and bridleways. Dollymans Farm offers several bridleways and</p>	

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		<p>footpaths running across the land and offers a very unique and much used facility for horse riders in the area. The circuit of bridleways includes a Pegasus crossing that is used to cross the A129, Bridleway 17 which runs past Dollymans farm, Bridleway 55 which runs from Doublegate Lane to Rawreth Barns and across the Rawreth Barn Bridge over the A130 back to the A129 and footpath 19. The use of the land for waste would curtail the use of these bridleways as the proposed entry to the site from the A129 is very close to the Pegasus crossing and the access road runs parallel to Bridleway 17. Having an access road in such close proximity will cause danger, noise and dust from the heavy lorries, in addition Council are further concerned by the years of disruption this site will cause to residents along London Road. The landowner also states that The allocation of Dollymans Farm would not compromise the objectives of the Greenbelt and in the medium to long term once restored would likely result in an improvement to the landscape character. This is highly disputed by the Council as this would indicate that the area would actually be improved by the proposed use, however the loss of the current land far outweighs any possible improvement to the landscape and this is supported by the fact that the total quantity of infill waste would be around 500,000 tons, equal to fourteen 20 ton lorries per day for 5 years. Council are further concerned by the years of disruption this site will cause to residents along London Road. The access to the site would be from the A129, with a road then running southwards through the farm to the site. Council have very grave concerns that there is a very real threat of leaching from the site into the</p>	

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		<p>North Benfleet/ Rawreth Brook system as the natural drainage from the site is direct into the brook. This leaching could undo some of the recent improvement to the water quality in the River Crouch. In addition unless the site is strictly controlled with what is dumped there much noxious material under the guise of building waste can find its way under the radar. The Site Layout Plan indicates the areas of the site proposed for the respective uses, however, the landowners have also indicated that they are amenable to increasing the amount of inert landfill subject to Essex County Councils requirements, and would also be willing to consider accommodating other waste streams to include non-inert and non-hazardous waste. In addition, while the proposed use of the site is for waste transfer and inert landfill, the landowners are willing to take a flexible approach to prospective uses and to discuss the possibility of locating alternative or additional waste facilities on the site including composting, recycling and energy from waste uses. The landowners and their agents, Strutt &amp; Parker have stated they would be more than happy to enter into discussions with Essex County Council in this regard, and state If an allocation for the site for a waste use is forthcoming, we intend to enter into detailed discussions with a number of interested operators in the area. This offers little support that the Greenbelt land would remain as such and that it would be restored to its former status. The site offers very close proximity to the Southend Victoria to Liverpool Street line, this lies on the southern boundary of the site and could also provide the opportunity for a siding off of the railway line as part of a future waste development on the site, and allow for the</p>	

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		<p>importation of waste from London and further afield. There are also two very important War Memorials on the land, one of which will fall within the proposed site. The Memorials are dedicated to two Airmen and are of great historic and local interest and are both the subject of funding to restore them over the coming year. Council feel that not enough local knowledge has been gained by the inspector in considering this proposal and including the site within the plan. Both Rawreth and Shotgate are prone to flooding and with approved plans in both areas for new housing developments more investigations need to take place with regards to the impact this site could have with regards to flood risk. The void on this site could become a vital part of a flood prevention scheme to mitigate the pressures of the future developments to the East and the West; this could provide a haven for wildlife with creative planting, a scheme far more in keeping with the use of Greenbelt land.</p>	
1059690, 50	No	<p>I fully support the Council and Parish Councils view that this should not be approved. The road infrastructure is strained now and this would make it unbearable.</p>	
1059689, 51	No	<p>I wish lodge my objection to the proposed use of the Dollymans Farm site for landfill. I believe this site to be located too close to local housing, and I believe the local infrastructure is unable to cope with additional volumes in traffic, particularly heavy loads. Traffic on the surrounding roads are already frequently at standstill in peak hours, and roads are already frequently damaged by the vehicles accessing the business park. This will</p>	<p>I don't believe the issue can be resolved, as it's a fundamental concern around the suitability / scale of the site and proximity to residential areas.</p>



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		be a further degradation of the little remaining green belt land in the area, and will inevitably lead to increase pollution.	
1060019, 59	No	As a resident of Shotgate I am deeply concerned about the proposed plans for the site at Dollymans farm quite apart from the proximity of this site to large residential areas my most pressing worry is for the safety and welfare of my young daughter who attends the day nursery adjacent to the proposed site. The risk to the health of many very young and vulnerable children is not acceptable. The risk of dust pollution, noise and the number of heavy vehicles moving in close proximity to a Forestry school which takes these children out of the nursery and uses the road to access footpaths and the Brook nearby as much as twice a day is utterly unacceptable. The risk of leaching into the Brook is bad enough without the knowledge that children are around the area on a daily basis. The fact that anyone would consider it appropriate to put young children at such risk is highly objectionable.	This is not something that can be resolved
1060218, 60	No	In relation to the above I wish to respond against the plan as follows: The area to be developed is in greenbelt. It is very close to an important war memorial. It encloses another important war memorial. It would spoil the country views I enjoy whilst walking on a footpath in the area. I fear the likelihood of increased pollution in the area. I fear the various types of waste which will be transported to this proposed site. I fear potential water pollution from the run-off from this site into a local brook. I fear the effect this proposed waste site will have on the proposed 400	

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		new properties adjacent to the proposed consultation waste area.	
1060235, 61	No	<p>I have received a flyer from Shotgate Parish council notifying me of the consultation process regarding the proposed siting of a landfill and recycling plant at Dollymans Farm. I am extremely concerned that a project like this is being considered without giving nearby residents any advance notice. If or had not been for the Parish Council's flyer the residents of Shotgate would have been completely unaware of this proposal! The consultation period closes on 16 February which only gives me 12 days to review the myriad of documents relating to the proposed installation which is hardly sufficient. Like most other people in the area I am not an expert on planning or environmental matters and must rely on common sense arguments when raising my objections to the proposal. In the time that I have spent researching this matter I have seen several comments which give me much cause for concern e.g. 1. That the proposal would result in 14 20 tonne lorries on the A129 per day for 5 years. What hell will that be for local residents? 2. The site is very close to existing housing. The noise pollution of the lorries and the operation of the site would be unacceptable for residents. 3. The potential for dust and other pollutants in the air would be considerable. No doubt Essex County Council will seek to reassure residents that there will be restrictions on the type of waste being handled on the site but we all know that companies will often include prohibited items either deliberately or accidentally. This risk is not acceptable when there are so many</p>	

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		<p>people in close proximity to the site. 4. There are two war memorials in our adjacent to three proposed site. I consider these to be sacrosanct and should not be affected by these plans. 5. The area of the site is much used by local residents for leisure activities. I am particularly concerned for the many horse riding enthusiasts who use the area as a safe place to enjoy their hobby. I hope my objections will be taken into consideration when considering the proposal.</p>	
1060268, 70	No	<p>I would like to lodge an objection to the proposal of waste disposal at Dollyman's farm. I have just enrolled my daughter in the pre-existing forestry nursery that is on the site. I hardly think it's conducive to the forestry ethos of being at one with nature to be near an area of waste disposal, not to mention the potential risk an increased volume of traffic would pose to children who have been told they can walk in the area from the nursery. Can you give me some information about this please?</p>	
1060275, 72	No	<p>I wish to state my opposition to the proposed waste facility at Dollymans Farm. The reasons are as follows, It is in the greenbelt, It will undoubtedly lead to an increase in commercial traffic, including refuse vehicles, There is a high possibility of pollution and ground contamination, At this present time the types of waste are an unknown, There is a small brook/stream that runs adjacent to the area and this may be contaminated. In addition to the above there is the possibility of odours. We already have a foul smell that reaches us daily from the waste</p>	

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		facility adjacent to the A127.	
1060277, 74	No	<p>I am writing to outline my objections to the proposed land fill site at Dollymans Farm, Rawreth, and Essex. Apart from the obvious objections about a beautiful site which is used by many local people, my objections relate to the nursery which has not long opened being on the same site as a landfill. Treehouse forestry nursery is an outstanding and innovative nursery whose whole ideals are based on the children being outside, with nature. The point is they learn about their surroundings by being outside for at least 3 hours of day. Children who have previously been to a Forrest nursery or preschool start Infant school with a clear advantage over the other children. This is the first full time provision of forestry nursery in Essex and the greenest eco-friendly nursery provision in the Wickford area. "Our nursery encourages being outdoors which allows babies to fill their lungs with clean air and use all of their senses to appreciate the colours, different noises, the sense of space and of scale. The outdoor nursery environment offers experiences that babies simply cannot have indoors. The outdoor environment supports busy movement, which helps to strengthen children's muscles, hearts and lungs. Exposure to the outdoor environment may also foster nursery children's health via strengthened immunity, more regular sleeping patterns and a sense of well-being."- Treehouse club Website I'm sure it is it obvious to anyone that a nursery that is based on these philosophies cannot operate with a landfill</p>	

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		next to it!	
1060325, 76	No	I personally object to this site on the bases of excess volume of traffic in the area, contamination via water run of being likely to get into the water system via a brook which runs fairly close to the site and the likely hood of pollution and rubbish in the area. (as the case of the site near the station at Pitsea fly over and the A13)	
1060328, 77	No	Main points of Concern: Restriction of access to Bridal paths for both pedestrians and horses a much cherished local facility plus heavy vehicles and horses a problem mix Approaching the farms entrance from Carpenters Arms immediately under the bridge the slow moving vehicles pulling out from the farm are extremely likely to end in a collision a lot of near misses occur now when drivers get surprised turning the bend and a very visible slow down warning sign would be essential. Because of the very gridlocked history of the A129 especially during the commuter period particularly the early rush hour a time restraint to exclude this period would be .(between 0730 -0900 the road into Wickford is total jammed. The local housing plan for Shotgate is for 400 new houses plus a large increase for the Rochford area will this should also be taken into account for the effect on the roads	
1060330, 78	No	I wish to lodge my objection to the proposal to include Dollymans Farm as a waste dump. I object to the use of green belt land for this purpose and, like many others, value this land to walk my	

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		dog and ride my horse. The area known to us as the bowl field is used for retired or unfit horses. We are really short of safe areas like this and it would be so sad to see it go.	
1060640, 100	No	I personally object to this site on the bases of excess volume of traffic in the area, contamination via water run off being likely to get into the water system via a brook which runs fairly close to the site and the likelihood of pollution and rubbish in the area. (as the case of the site near the station at Pitsea flyover and the A13).	
1060674, 101	No	As a local resident, I would like to object for the following reasons:- - increase in traffic on local roads (particularly A127/A1245/A129). This traffic is already expected to increase with the additional house building planned - eg 500 houses in Rayleigh West and the 3,000+ houses planned for the Wickford area. Basildon Council also proposed allowing the construction of 400 new houses opposite the proposed waste area. - the land proposed is in the greenbelt. - Likelihood of pollution within the area. This could come in the form of burning of waste and also the leaching from the site into the North Benfleet / Rawreth Book system. I believe a survey has determined that the natural drainage from the site is directly into the brook. - there are two important war memorials on the land, of which one falls within the proposed site. I feel that serious consideration should be given as to whether it is appropriate to allow this development so close to important memorials.	

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1060862, 106	No	<p>I wish to oppose the proposed site for waste disposal for the following reasons With the amount of flooding in this area this site would be ideal as a balancing pond to regulate the flow of flood water from the A130 and the surrounding area which will only increase with the new developments in the area. The local water courses i.e. Benfleet brook and Chichester brook and onwards to the River Crouch would become contaminated with pollutants leaching from the proposed site. The A129 is already a very busy road with several serious accidents occurring nearby to the entrance to Dollymans farm (the junction of Old London Road and the A129) and with the anticipated increase in heavy vehicles the problem can only get worse. This is another intrusion into the Green Belt in this area which will, in the near future, be covered in new developments and is already saturated with football pitches on land owned by the applicants of this proposal. If the proposed site was used as a balancing pond it would be an asset to the area and attract wildlife back into the area. No doubt, if this development is passed, Rochford District Council will have a whole list of conditions to the planning consent but going on past experience over the last 12 years the applicant will ignore these conditions and RDC will not enforce them as has happened on numerous occasions in the past of which have a great deal of proven evidence. For these reasons I wish to oppose the application.</p>	
1060863, 107	No	<p>I would like to object to the building of a waste collection site on the Dollymans farm area. This will produce additional traffic</p>	

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		volume and possible extra pollution.	
1060879, 109	No	The position of Dollymans Farm in the green belt should make this proposition unacceptable to all. You only have to think of the traffic implications, pollution and the closeness to residential properties to realise this. This area was left off the original plan for a reason and that is the way it should stay.	The inspector should take a fresh look at this proposition because something must have been overlooked more consultation with local people and organisations is definitely required.
1060891, 111	No	As a local resident living in Shotgate I would like to object for the following reasons; The increase in traffic on local roads is the A127, A1245 and A129. These roads are already busy as it is without the proposed building of 500 plus houses in Rayleigh West, the possible building of 3000 plus houses in Wickford and the proposed 400 houses opposite this proposed waste site. This land for the waste site is on greenbelt. pollution levels will rise within the area with waste being brought in to this area, not only from lorries bringing it in but the disposal of this waste whether by burning or other means. there are a couple of important war memorials on the land, serious consideration should be given to whether this site should be allowed as I believe the impact to the environment and health is seriously going to be impacted on.	
1060894, 113	No	This site will impact on the entire area, creating more traffic, destroying green belt, possible water contamination, air pollution to surrounding properties and destroys war memorials, footpaths and bridleways. If this is a landfill site why has planning permission been sought for burning waste and a scrap yard.	This proposal needs to be reconsidered and sited elsewhere as the local roads are not able to cope as it is and this would gridlock the area during rush hour. No consideration has been given to air pollution or noise. The green belt would be compromised and water could



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		<p>There is nothing in the application to ensure that once filled the hole would be landscaped and the facility would close. House prices could be affected. There has been no proper consultation with residents. This proposal is a disaster for both Wickford and Rayleigh as we already have a facility close by.</p>	<p>be contaminated with run off from the site. A large number of new houses are to be built close to the site. The application goes far beyond just a landfill site - why? This must be reviewed by an independent assessor - not the original one as is proposed.</p>
1061073, 119	No	<p>The proposed site is within a designated Green Belt Area. It should continue to be protected as such. The field in question is rented by a local equine centre and is "home" to a number of retired horses who are seeing out the last days of their lives there. I see the horses daily and they are very settled here, as many before them have been over a number of years. I have grave concerns over the pollution to the river network this waste site would cause. There are streams surrounding the field and I echo the comments made by River Crouch Conservation Trust ( Roy Hart) (ID: 1057854) . There are two war memorials that would be effected by the proposed plans, one of which (I believe) has already been moved once for the provision of the new A130. It is grossly unfair that it should be subject of movement once again. The plans would make visiting the memorials almost impossible and at best, extremely unpleasant. Poppies are placed on the memorials throughout the year and are visited on Armistice Day. One of the memorials is also a Geo-cache site, the whole point of which is getting families out into the country - not to visit a waste tip! There will obviously be a heavy increase in road traffic on a network that is barely able to cope as well as</p>	<p>The only change you can make that would be acceptable is to remove Dollyman's from the list of proposed sites. It wasn't on there in the first place for very good reason.</p>

Person ID, Organisation, Comment ID	Do you agree with proposed modification M23?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>the pollution that goes with it. I would also like to echo the comments of Katie Dawes (ID: 1060277) . I walked past the field just the other day and saw six of the children from the nursery on a walk up to see the horses in the field. This is a wonderful and safe countryside environment for the children from Treehouse Forestry Nursery who would be so adversely effected by the proposed plans. Any waste tip brings problems with it. Apart from the stench that will undoubtedly reach properties within the vicinity, it will also attract scavengers, rats and seagulls in hordes. Should these plans be approved, a heavy reduction in housing value in the surrounding area would undoubtedly occur, if that indeed hasn't already started. The perimeter of this field is used daily by horse riders, dog walkers and children. It is an area that should be protected, not destroyed.</p>	
1061229, 127	No	<p>Greenbelt land: This is on greenbelt land, which is now only very small between that of Shotgate and the ever expanding Rayleigh. This is used daily by walkers and horse riders offering an area of open countryside where people can walk and ride safely. The access to green fields and bridleways is already limited in the area, however Dollymans farm offers several across its land. In a world where health is of paramount importance, surely we should be encouraging people to get out in the fresh air. If this is turned into a waste landfill, what options will local residents have but to get in their cars (creating more pollution) to find an area of open unpolluted countryside. Historic : There has been inadequate consultation, investigation and</p>	<p>Dollyman's Farm should be removed from the list of potential waste landfill sites. It was not on the original proposal for obvious and valid reasons. It is not a viable option.</p>

Person ID, Organisation, Comment ID	Do you agree with proposed modification M23?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>respect given into how this will impact the historic and cultural aspect of the area. There are two very important War Memorials on the land, one of which will falls within the proposed site. These are dedicated to two airmen are of great historic and local interest. People visit this site and place poppies regularly throughout the year. This would be of great disrespect to have to move AGAIN. Traffic : The proposal lends itself to traffic issues with an increase on local roads such as the A127, A1245 and A129. The infrastructure and quality of these roads currently serving the area already cannot cope with the lorries coming into the business park, let alone another fourteen 20 ton lorries every day. Furthermore if the additional 400 houses (opposite the proposed waste site) are built. This will ultimately result in gridlocks. These are country roads built for suburban living. Air Pollution: Undoubtedly pollution will rise as a result of the waste being brought into the area. Dust from construction waste such as concrete and from the lorries bringing the waste to the site. There is no clarity of how the waste will be monitored to ensure that there will be no hazardous materials (i.e. asbestos) hidden under tons of rubble. Water Pollution: There is no confirmation or assurances that this will not leach into the North Benfleet / Rawreth Brook system, as the natural drainage from the site is direct into the brook. Limitations: . I would highly dispute the suggestion that once restored the site would likely result in an improvement to the landscape character. Firstly, there is nothing in the application to ensure that once filled, the hole would be landscaped and the facility would close and secondly there is nothing limiting the site to waste landfill. The landowners have</p>	

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		openly stated that they would be open to additional discussions regarding the disposal of future waste on other part of the land	
1061390, 134	No	<p>The proposed site is in a designated green belt area and it should stay as this. It is home to the newly opened Treehouse Forest nursery, which specializes on outdoor play in the natural environment. Which is the best education for children, this won't be able to continue if the waste plant is built here. Who in their right mind would send their children to a Forest nursery where the children are unable to use the outside area as it's become a waste site! The site is also rented by a local equine centre and where a number of retired horses live, if the waste site goes ahead you will be leaving the horses without a home, how would you feel if someone came and ripped your home out from beneath you? The two war memorials at the site will be effected by the proposed plans. They were put there to honour those who fought for our country and lives, poppies are placed on the memorials throughout the year and are visited on Armistice Day. These plans would make them impossible to visit and it is disrespectful to move them. Road traffic will increase, which the roads already are unable to cope with and cause strain on existing amenities such as drainage. The pollution, smell and obvious vermin that goes with waste sites will reach our homes and will devalue our properties. This site and the surrounding area is used by cyclists, horse riders, dog walkers and children. We should be protecting our countryside, not destroying it and should be setting a good example to our children by teaching</p>	Dollymans Farm needs to be removed from the list of proposed sites and for this waste plant not to go ahead!!

Person ID, Organisation, Comment ID	Do you agree with proposed modification M23?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		them about the countryside and its importance to everyday life!	
1061564, 148	No	<p>Why should the landowner be able to question Essex County Council after they have decided that Dollymans Farm was not to be included in plans for a waste disposal site? Do they, who are local landowners but not living near this area, have some influence over the council or have they seen that this could be a massive money making exercise? The Parish Council have put together very good reasons why Dollymans Farm would not be a suitable site and these should be thoroughly considered. Having been a resident in Wickford for very many years and seen the changes, for good or bad, that have taken place to what was once a village and the lack of infrastructure to cope with what is now an ever growing town, to yet have little of what is left of open spaces for the local community taken away from us is quite appalling. I appreciate that with an ever growing population waste disposal is of importance and nobody wants it to be on their doorstep but Dollymans Farm certainly has many reasons why it is not suitable and very big concerns to the local residents are pollution, noise, traffic etc. all of which and more have been highlighted by the Parish Council. I really hope that the Council will reconsider their decision to include Dollymans Farm in their plans.</p>	

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923503, A H Philpot & Sons, 152	Yes	<p>Modification 23, which consists of a new table to set out the parameter for Dollymans Farm, Basildon/Rochford (L(i)16) for inert landfill is supported in planning terms. The proposed site area and allocation of Dollymans Farm for the disposal of approximately 500,000 tonnes of inert waste is supported and accords with our estimation of the borrow pit void capacity. The estimated availability commencing in 2017 is strongly supported. As discussed at the Examination in Public, the applicant is committed to the early delivery of this site. It is the intention, following adoption of the Waste Local Plan to work up a full planning application for submission to Essex County Council. This will enable the site to meet the required and existing needs for inert waste disposal from nearby centres of population, especially Basildon, Wickford, Rayleigh and Chelmsford. In terms of the detailed criteria as set out within the policy, the applicants are in agreement that access to and from the site should be via the A129. It is the applicants' intention to access the site via the private road, named Doublegate Lane onto the A129. The applicants are also happy with the policy criteria that seeks to provide landscape and biodiversity enhancements upon restoration. This will include the early restoration of the land adjacent to the A130 and planting of a tree buffer. As referred to at the Examination in Public and as set out in our previous representations, the current site is of very poor amenity value and currently detracts from the surrounding landscape. It is considered that the allocation of this site, will allow and enable improvements to the landform of the site. Due consideration will be given to new planting during the restoration to provide</p>	

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		<p>landscape benefits. The applicants also confirm that relevant desk based archaeological work and dust and noise information will be prepared to accompany the planning application. These are all matters of detail that can be adequately addressed at planning application stage. It is likely that at planning application stage, the application will also be for a proposed inert waste recycling centre in conjunction with the inert waste disposal. In this regard due consideration will be given to the policy criteria as set out within Appendix 18. In particular adequate consideration will be given to detailed landscape screening. Whilst it would have been the preference of the applicants for the inert waste recycling centre to be allocated at this stage, it is understood that following the Examination in Public, that this is matter that will need to be assessed in further detail at planning application stage. Overall the modification as set out in Appendix 18 is supported.</p>	
1061217, 156	No	<p>This is green belt land and I can see that the owner states he will plant trees when the plot is filled in with other people's rubbish but we will have to wait years for that to be complete, if he wants to plant trees plant them now. The transport infrastructure is already stretched and the A129 is the diversion route when the A127 is closed which it often is this road cannot take further traffic. Lorries are slow to accelerate and particularly when turning right out of Dollymans Farm they will pose a hazard to traffic on the road including pedestrians as there is no footpath, cyclists and buses as this is a bus route. If the lorries turn left and then turn around using the Hodgson Way roundabout they</p>	Leave the green belt land alone.

Person ID, Organisation, Comment ID	Do you agree with proposed modification M23?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>will further destroy the surface of the roundabout which is in a poor state with several potholes already. Flooding is a problem locally already, this cannot be ignored. Both the Carpenters Arms roundabout and the Rayleigh Spur flood when we have heavy rain. The field that is to be filled in has lying water in it as I type this he we have not heavy rainfall. If this is filled in where will that water go? I cannot believe flooding will lessen because of this plan, and further I do not believe that has been considered properly. Monitoring of the waste cannot be guaranteed and there may be waste in the site that should not be in there which could leach into the water course. The brooks locally support a lot of wildlife and they run alongside the bridal paths where people walk with dogs that run in and out of the water. This all leads into the river Crouch which runs past Memorial Park and out to Battlesbridge and there are now fish in that water. I come back to the fact that this is green belt and there are very few areas left in Wickford with bridal paths and tracks available to the public. The bridal paths in this area are used daily by horse riders and dog walkers including myself. This will adversely affect my quality of life by taking a beautiful walk away as it will be too dusty and full of rubbish to use with my dogs and it will devalue my house. Life is not just about making money I would like to point out that part of the woodland on this farm has already been demolished despite there being no planning so that a paintball area could be created. Only after it had all been dug up were council notices put up saying this could not be done. This land owner cannot be left with responsibility for what is</p>	



Person ID, Organisation, Comment ID	Do you agree with proposed modification M23?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		going to end up in this site.	
1061576, 157	No	As a local resident I would like to object against using Dollymans Farm as a site for a waste facility for the following reasons: It is green belt land The local roads cannot cope with the high volume of traffic now without the increase this would cause There are 2 war memorials on the site It is very close to local housing and the stench will be disgusting The pollution to the river network	Remove Dollymans Farm from the list of proposed sites
1061576, 158	No	As a local resident I would like to object against using Dollymans Farm as a site for a waste facility for the following reasons: It is green belt land The local roads cannot cope with the high volume of traffic now without the increase this would cause There are 2 war memorials on the site It is very close to local housing and the stench will be disgusting The pollution to the river network	Dollymans Farm should be removed from the list of proposed sites

Person ID, Organisation, Comment ID	Do you agree with proposed modification M23?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
1061577, 159	No	<p>I strongly disagree with the Dollymans Farm site being considered in this proposal for several reasons. First and foremost is the fact that this land is GREENBELT. The land at Dollymans is all that remains of a thin slither of green belt between Shotgate and the every growing Rayleigh. The landowner states that "the site is of poor quality, particularly in terms of visual amenity". I want to let the inspector know that this so called "poor quality land" is used on a daily basis by horse riders, dog walkers and walkers and we do not consider it of poor quality. This greenbelt land has several bridleways and footpaths running across the land and offers an unique and much used facility for residents of the area. Secondly I am concerned by the increase in the volume of traffic on what is already an over stretched road network in the area. This would cause years of disruption for residents of this area who already battle through overcrowded roads on a daily basis. Thirdly, the potential threat of leaching from the site into North Benfleet/Rawreth Brook system as the natural drainage from the site is direct into the brook. In addition to the above concerns there are also two War Memorials on the land. One of these falls within the proposed site. The memorials are dedicated to two WW1 Airmen and are of historic and local interest. We should be honouring these men not disturbing these sites with tonnes of landfill. The local parish council has funding to restore both sites over the coming year. These sites are visited regularly something we will no longer be able to do if the landfill site goes ahead. Both Shotgate and Rawreth are prone to flooding and both have approved plans for new housing developments it is</p>	remove the Dollymans site from the proposal

Person ID, Organisation, Comment ID	Do you agree with proposed modification M23?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>unknown what impact this proposed site will have on these developments. Lastly a new Forest Nursery has recently open on the Dollymans Farm site. The Nursery's ideals are based on children being outside, with nature, where they learn about the natural environment. They are outside at least 3 hours a day. This Nursey is the first full time provision of a forestry nursery in Essex and the greenest eco-friendly Nursery provision in Wickford. The following extract is from the Nursery website.....</p> <p>"Our Nursery encourages being outdoors which allows babies to fill their lungs with clean air and use all of their senses to appreciate the colours, different noises, the sense of space and of scale. The outdoor nursery environment offered experiences that babies simply cannot have indoors. The outdoor environment supports busy movement, which helps to strengthen children's muscles, hearts and lungs. exposure to the outdoor environment may also foster children's health via strengthened immunity, more regular sleeping patterns and sense of wellbeing" They won't be able to do all this and experience the benefits of the outdoors with a landfill next to it. The children walk daily around the footpaths and bridleways.</p>	
1061583, 160	No	<p>I disagree because of pollution and environmental issues Lorry and traffic issues council already don't repair roads in shotgate pot holes and Kirbs broken to be filled with Tarmac which lasts five minutes for hole to re appear</p>	<p>I disagree just look at my road I live path and road is terrible this will only get worse with heavy lorries and destroy the environment put it in pitsea with the other waste disposal sites</p>

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1061588, 161	No	<p>I strongly disagree with the Dollymans Farm site being considered in this proposal for several reasons. First and foremost is the fact that this land is GREENBELT. The land at Dollymans is all that remains of a thin slither of green belt between Shotgate and the every growing Rayleigh. The landowner states that "the site is of poor quality, particularly in terms of visual amenity". I want to let the inspector know that this so called "poor quality land" is used on a daily basis by horse riders, dog walkers and walkers and we do not consider it of poor quality. This greenbelt land has several bridleways and footpaths running across the land and offers an unique and much used facility for residents of the area. Secondly I am concerned by the increase in the volume of traffic on what is already an over stretched road network in the area. This would cause years of disruption for residents of this area who already battle through overcrowded roads on a daily basis. Thirdly, the potential threat of leaching from the site into North Benfleet/Rawreth Brook system as the natural drainage from the site is direct into the brook. In addition to the above concerns there are also two War Memorials on the land. One of these falls within the proposed site. The memorials are dedicated to two WW1 Airmen and are of historic and local interest. We should be honouring these men not disturbing these sites with tonnes of landfill. The local parish council has funding to restore both sites over the coming year. These sites are visited regularly something we will no longer be able to do if the landfill site goes ahead. Both Shotgate and Rawreth are prone to flooding and both have approved plans for new housing developments it is</p>	<p>take Dollymans off of the list we do not have the roads to cope with more traffic.</p>

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		<p>unknown what impact this proposed site will have on these developments. Lastly a new Forest Nursery has recently open on the Dollymans Farm site. The Nursery's ideals are based on children being outside, with nature, where they learn about the natural environment. They are outside at least 3 hours a day. This Nursey is the first full time provision of a forestry nursery in Essex and the greenest eco-friendly Nursery provision in Wickford. The following extract is from the Nursery website.....</p> <p>"Our Nursery encourages being outdoors which allows babies to fill their lungs with clean air and use all of their senses to appreciate the colours, different noises, the sense of space and of scale. The outdoor nursery environment offered experiences that babies simply cannot have indoors. The outdoor environment supports busy movement, which helps to strengthen children's muscles, hearts and lungs. exposure to the outdoor environment may also foster children's health via strengthened immunity, more regular sleeping patterns and sense of wellbeing" They won't be able to do all this and experience the benefits of the outdoors with a landfill next to it. The children walk daily around the footpaths and bridleways. It will end up with us having no outside space for any of us to use We are building houses wherever possible so that means more traffic but no extra roads to accommodate this we cannot cope with this as well</p>	

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1061600, 162	No	<p>I strongly disagree with the Dollymans Farm site being considered in this proposal for several reasons. First and foremost is the fact that this land is GREENBELT. The land at Dollymans is all that remains of a thin slither of green belt between Shotgate and the every growing Rayleigh. The landowner states that "the site is of poor quality, particularly in terms of visual amenity". I want to let the inspector know that this so called "poor quality land" is used on a daily basis by horse riders, dog walkers and walkers and we do not consider it of poor quality. This greenbelt land has several bridleways and footpaths running across the land and offers an unique and much used facility for residents of the area. Secondly I am concerned by the increase in the volume of traffic on what is already an over stretched road network in the area. This would cause years of disruption for residents of this area who already battle through overcrowded roads on a daily basis. Thirdly, the potential threat of leaching from the site into North Benfleet/Rawreth Brook system as the natural drainage from the site is direct into the brook. In addition to the above concerns there are also two War Memorials on the land. One of these falls within the proposed site. The memorials are dedicated to two WW1 Airmen and are of historic and local interest. We should be honouring these men not disturbing these sites with tonnes of landfill. The local parish council has funding to restore both sites over the coming year. These sites are visited regularly something we will no longer be able to do if the landfill site goes ahead. Both Shotgate and Rawreth are prone to flooding and both have approved plans for new housing developments it is</p>	find an alternative.

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		<p>unknown what impact this proposed site will have on these developments. Lastly a new Forest Nursery has recently open on the Dollymans Farm site. The Nursery's ideals are based on children being outside, with nature, where they learn about the natural environment. They are outside at least 3 hours a day. This Nursey is the first full time provision of a forestry nursery in Essex and the greenest eco-friendly Nursery provision in Wickford. The following extract is from the Nursery website.....</p> <p>"Our Nursery encourages being outdoors which allows babies to fill their lungs with clean air and use all of their senses to appreciate the colours, different noises, the sense of space and of scale. The outdoor nursery environment offered experiences that babies simply cannot have indoors. The outdoor environment supports busy movement, which helps to strengthen children's muscles, hearts and lungs. exposure to the outdoor environment may also foster children's health via strengthened immunity, more regular sleeping patterns and sense of wellbeing" They won't be able to do all this and experience the benefits of the outdoors with a landfill next to it. The children walk daily around the footpaths and bridleways.</p>	
1061606, 163	No	<p>I'm a local resident and I would like to object against using Dollymans Farm as a site for a waste facility for the following reasons: It is green belt land The local roads cannot cope with the high volume of traffic now without the increase this would cause There are 2 war memorials on the site It is very close to local housing, the stench will be disgusting and noise pollution</p>	Find another site!

Person ID, Organisation, Comment ID	Do you agree with proposed modification M23?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		will increase The pollution to the river network	
1061607, 164	No	Simply put the landfill site should not be built at Dollymans Farm	1 - The land is Green Belt and therefore should be protected and not built upon. 2 - Potential of toxic fumes being released too close to residential communities 3 - Increase in volume of HGV and other vehicles on roads which will contribute to the poor state they are already in and in dire need of repair 4 - Risk of safety to residents with increased traffic and air quality 5 - Only benefit appears to be in favour of the land owners of Dollymans Farm and whoever palms have been greased on the council to put this site forward. There lies the problem in its entirety!
1061611, 165	No	I strongly disagree with the Dollymans Farm site being considered in this proposal for several reasons. First and foremost is the fact that this land is GREENBELT. The land at Dollymans is all that remains of a thin slither of green belt between Shotgate and the every growing Rayleigh. The landowner states that "the site is of poor quality, particularly in terms of visual amenity". I want to let the inspector know that this so called "poor quality land" is used on a daily basis by horse riders, dog walkers and walkers and we do not consider it of poor quality. This greenbelt land has several bridleways and footpaths running across the land and offers an unique and much used facility for residents of the area. Secondly I am concerned by the increase in the volume of traffic on what is already an over stretched road network in the area. This would	Waste should be kept away from residential areas and small side roads



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		<p>cause years of disruption for residents of this area who already battle through overcrowded roads on a daily basis. Thirdly, the potential threat of leaching from the site into North Benfleet/Rawreth Brook system as the natural drainage from the site is direct into the brook. In addition to the above concerns there are also two War Memorials on the land. One of these falls within the proposed site. The memorials are dedicated to two WW1 Airmen and are of historic and local interest. We should be honouring these men not disturbing these sites with tonnes of landfill. The local parish council has funding to restore both sites over the coming year. These sites are visited regularly something we will no longer be able to do if the landfill site goes ahead. Both Shotgate and Rawreth are prone to flooding and both have approved plans for new housing developments it is unknown what impact this proposed site will have on these developments. Lastly a new Forest Nursery has recently open on the Dollymans Farm site. The Nursery's ideals are based on children being outside, with nature, where they learn about the natural environment. They are outside at least 3 hours a day. This Nursey is the first full time provision of a forestry nursery in Essex and the greenest eco-friendly Nursery provision in Wickford. The following extract is from the Nursery website.....</p> <p>"Our Nursery encourages being outdoors which allows babies to fill their lungs with clean air and use all of their senses to appreciate the colours, different noises, the sense of space and of scale. The outdoor nursery environment offered experiences that babies simply cannot have indoors. The outdoor environment supports busy movement, which helps to</p>	

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		strengthen children's muscles, hearts and lungs. exposure to the outdoor environment may also foster children's health via strengthened immunity, more regular sleeping patterns and sense of wellbeing" They won't be able to do all this and experience the benefits of the outdoors with a landfill next to it. The children walk daily around the footpaths and bridleways.	
1061608, 166	No	The site proposed is too close to residential areas it also has a preschool one site which should not be situated next to a waste disposal site. Traffic leading to and from the site would be too much for our roads to take and would cause congestion in and around our town, which already struggles to deal with the level of traffic at peak times of the day. The proposed site is green belt land There are 2 war memorials on the site It is very close to local housing and the stench will be disgusting The pollution to the river network	Find an alternative site away from a residential area, that does not have traffic issue already.
1061626, 167	No	i disagree with this land being used for this purpose as it is green belt land, it's some of the only green land we have left round here. The traffic and pollution this will cause is also problematic.	Find somewhere else to put it, away from the build-up of residents who use it to walk dogs, cycle and walk.
1061616, 169	No	1) This is Greenbelt land. 2) War Memorials and a brook close by. 3) Already too much traffic in this area with the industrial estate nearby. This is adding more lorries. The road will be in disrepair faster and more frequently. 4) I live nearby, I'm sure the smell of this waste site will not be pleasant. 5) There is a	To take the waste site elsewhere.

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		children's nursery which has just opened on this site!!	
1061647, 172	No	I would like to object to the proposed land fill site at Dollymans Farm , Rawreth, Essex. - increase in traffic on local roads. With the planned new housing being dumped on West Rayleigh you now want a land fill and the extra traffic that comes with this. - the land is in the greenbelt. - eyesore - this is the entrance to Rayleigh from the a127. - pollution. extra traffic, smell, dust, waste spillage into local drainage.	move it somewhere else
1061643, 173	No	There is very little green land left in and around Wickford/Shotgate/Runwell and the surrounding areas. a landfill site is really not appropriate so close to houses and shotgate & Rayleigh, this would in effect join both the towns together. If the landfill doesn't get permission and houses are built, this too would be ridiculous. There really is by enough infrastructure and I feel like our small towns & villages will soon be like built up cities	Leaving the land as green land & not building on it
1061618, 174	No	We are left with very little green belt land now in Wickford. With every inch of grass being claimed for housing, we don't have much left. My Children friends and family love walking over this area. So i object to you taking this away to replace with landfill, which is clearly to close to housing, to close to a preschool with young children that should be safeguarded any way. The lovely wildlife we have over there also need their natural homes. Lastly traffic whilst a lot have people have mentioned the traffic on the A127 being bad but the actual road, Cranfield park road is not	Put it somewhere else!

Person ID, Organisation, Comment ID	Do you agree with proposed modification M23?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>wide enough to pass a waste truck and cars safely. I drive my children to school in Rayleigh and drive down this 4 times a day because i also work on Cranfield park road. On a Monday which is waste collection day, I have to pass the waste truck of a morning, it is very dangerous with the tight bends, with high bush so you can't predict what's coming around that corner especially when a truck is then adding further blind spot. I am practically driving in the ditch to avoid being hit. Also to point out on this road alone most morning there is a car in a ditch/bush because the road is so dangerous.</p>	
1061653, 177	No	<p>Dollymans Farm is in greenbelt. Will cause an increase in traffic, with large vehicles in the area. Pollution to area.</p>	<p>Find a viable alternative!</p>
1061590, 179	No	<p>Impact on Traffic, pollution from extra traffic. Impact on landscape. Impact on local infrastructure.</p>	<p>Nothing. I along with most Wickford, shotgate and Rayleigh residents are completely against any site in the local area being used for ANY kind of landfill. The local infrastructure cannot handle it just the same as the new housing developments that are being built without upgrading roads and amenities properly.</p>
1061661, 185	No	<p>This plant should not be given the go ahead this is the last of green belt left in this area. We do not want this as the smell would be terrible and the amount of lorries would raise noise levels so close to our only park and the roads within the area wouldn't cope with that amount of heavy vehicles, This needs to be in an area further out from residential living.</p>	<p>Before such things are put in place better infrastructure for the area needs to be looked at, Dr's, Schools and better outdoor facilities for the people living the proposed area.</p>

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1061645, 188	No	lorries to heavy for our roads ,possible flooding , devaluation of our properties , we live in the area for the greenbelt , you keep building on the green land animals and farm land will disappear .	Put it away from built up areas
1061672, 189	No	it has recently been brought to my attention that there is a consultation regarding disposal of waste at Dollymans farm, Shotgate, Wickford. I find it astonishing that living so close to the proposed site that I have not been approached by the authorities regarding the proposal. This is unacceptable in my opinion. I am now in the position of hurriedly responding as there is so little time to assess the proposal. On my first looking at the proposal, I would object to the proposal on several grounds: It is in the green belt. It will affect walkers and horse riders. There will be a large increase in heavy lorry movements for many years. There will be traffic issues on an already very busy road that I use to commute on a daily basis. There has been insufficient assessment of the impact on the wildlife in the area. Please can my views be taken into consideration.	
1061650, 191	No	There is very little off road safe riding in this area and having very large, heavy, noisy lorries driving along side and across the bridleway would make the bridleway basically unusable for all. It would also affect the walkers who also use the bridleway for exercising their dogs.	Don't have the waste site at Dollymans

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1061668, 192	No	<p>Firstly, this proposal seeks to take over an area of Greenbelt and no doubt will set a precedence for the future in that whilst the plan states is for 5-10 years, will never be given back. This is an area regularly used by horse-riders, dog walkers etc. and there is a forest pre-school that uses the site. Also, the site has an historical importance with WWII memorials there. Secondly, whilst the proposal states building rubble what preclusion is there to stop plasterboard and the like being dumped there with the potential to cause asbestos-like powder being released. This is why several other boroughs/counties no longer use landfill, but opt for incineration instead. The increase in traffic will be horrendous and on roads that are already heading towards sink-hole territory. This will only worsen with heavy loads regularly using them. The impact on the housing in Shotgate and Rawreth will be huge and not in a pleasant way. There is also the likelihood of an increase in flooding if this proposal is given the go-ahead again causing huge issues for the existing residents.</p>	<p>The adaptation of this particular site needs to be abandoned and either sited in an area far away from residential homes or further thought given to incineration which again, needs to be away from residential homes.</p>
1061657, 195	No	<p>I disagree with this because it would increase HGV traffic in our densely populated area with schools and children. Also it will impact on the maintenance of green belt and having seen the impact of Pitsea and surrounding areas as far as South Benfleet the foul smells omitted from these landfill sites creates an unhealthy and unpleasant smell that carries for miles and would seriously affect a densely populated community.</p>	<p>Put it somewhere that is situated no nearer than 5 miles from any community.</p>
1061685, 203	No	<p>I disagree with this because of the amount of traffic, disruption</p>	

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		to area & pollution it will cause.	
1061695, 204	No	<p>I have just received news of the above and am utterly disgusted that this is even being considered. As a resident of Shotgate for over 40 years, the pollution levels have noticeably increased in the last 10 years. The A130 by pass already impacts on the pollution levels, both noise and fumes due to the high volume of traffic using it. The factory units in Shotgate have increase, again more cars and pollution. The housing has increased, with a proposed plan for further 400 properties which will also add to the traffic pollution and congestion. We already have a waste plant at Basildon which is within 1 mile of the suggested plan. The fumes and waste emitted from this chimney are visible for miles and a blot on the landscape. The suggested site is greenbelt and has been used as farming for years until more factory units were allowed to use the farm. There is no need for more traffic [refuse vehicles using the Southend road and A127]. There is no need to pollute the atmosphere. There is no need for Mr Philpot to make more money at the expense of those around his farm land suffering health problems. There is a need to protect local residents and wildlife. The surrounding land contains fishing lakes and all natural habitats relating to these ponds. I have crested newts in my garden so there are bound to be more near the farm area. All the natural pongs were destroyed when the Council built houses at the back of Fanton Chase and Fourth Avenue so most wildlife would have reverted to the farmland and greenbelt. There is a need to support the environment globally. Please, please, please consider the</p>	

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		information proved and bear in mind that Basildon Council and Essex Council have already refused permission for this and Mr Philpot has found a loop hole to get his own way.	
1061694, 205	No	I objection to this proposition. It is on green belt land and there is a possibility of leeching of contamination into the local brook system, an increased volume of traffic in an already stretched road system on the A129/A1245 and the movement of two WW1 war memorials to airmen.	
1061688, 207	No	I strongly disagree with the Dollymans Farm site being considered in this proposal for several reasons. First and foremost is the fact that this land is greenbelt which we should be protecting not building on. The land at Dollymans is all that remains of a thin greenbelt between Shotgate and the ever growing Rayleigh. It is correct that a section of the land is of poor quality, mainly due to the landowner having a large fire on it a few years back, this should be cleaned up not used as an excuse for development. There are still large sections used by hikers, dog walkers etc. which are still appreciated. All the development in Wickford and surrounding areas on Green Belt land is making it more and more difficult for kids to safely go outside and for families to go on walks etc., just look at all the green belt lost to the barnhall area alone. I am concerned by the increase in the volume of traffic to the A129, A130 and surrounding roads to what is already an over stretched road network in the area. This would cause years of disruption for residents of this area who already battle through overcrowded	Whilst I accept new waste sites are required for increasing to meet future requirements, This development should not go ahead at this proposed location, it is far too close to existing and new proposed residential schemes which will be greatly affected by traffic and environmental pollution (smells, dust and noise) and further ruins our ever decreasing Greenbelt land. We should be trying to improve peoples' quality of life, not making it worse, and promoting healthy living including exercise and walking. This scheme does not help with either. A new site should be found located further away from residential locations, not on a war memorial site and not on precious greenbelt. No doubt as per usual the decision to build has already been made and our comments and views will be ignored.



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		<p>roads on a daily basis due to a lack of investment in infrastructure by ECC. In addition to the above concerns there are also two War Memorials on the land. One of these falls within the proposed site. The memorials are dedicated to two WW1 Airmen and are of historic and local interest. We should be honouring these men not disturbing these sites with tonnes of landfill. These sites are visited regularly something we will no longer be able to do if the landfill site goes ahead. I am concerned about the level of dust and the smells that will come from the site effecting neighbouring residential areas especially located in Shotgate and on the Wick estate This site is far too close to existing and proposed future housing schemes which will affect people's quality of life and the environment.</p>	
908048, Essex Bridleways Association, 212	No	<p>The inclusion of this site within the WLP for inert waste will have a detrimental impact on the Rights of Way network around the proposed site; the access road that is proposed to be used from the A129 is a Definitive Bridleway and users of this will be greatly affected with noise and dust generated from numerous HGV's accessing the site 6 days per week. There are also likely to be issues with safe road crossing on the A129 for non-motorised users of the bridleway with the proposed increase in HGV traffic.</p>	The site should be removed from the WLP.

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1061734, 213	No	<p>I am writing to outline my objections to the proposed land fill site at Dollymans Farm , Rawreth, Essex. Apart from the obvious objections about a beautiful site which is used by many local people, my objections relate to the nursery which has not long opened being on the same site as a landfill. Treehouse forestry nursery is an outstanding and innovative nursery who's whole ideals are based on the children being outside , with nature. The point is they learn about their surroundings by being outside for at least 3 hours of day. children who have previously been to a Forrest nursery or preschool start Infant school with a clear advantage over the other children. This is the first full time provision of forestry nursery in Essex and the greenest eco-friendly nursery provision in the Wickford area. "Our nursery encourages being outdoors which allows babies to fill their lungs with clean air and use all of their senses to appreciate the colours, different noises, the sense of space and of scale. The outdoor nursery environment offers experiences that babies simply cannot have indoors. The outdoor environment supports busy movement, which helps to strengthen children's muscles, hearts and lungs. Exposure to the outdoor environment may also foster nursery children's health via strengthened immunity, more regular sleeping patterns and a sense of well-being."- Treehouse club Website I'm sure it is it obvious to anyone that a nursery that is based on these philosophies cannot operate with a landfill next to it!</p>	
1061715, 214	No	Originally not considered as it's green belt, part of a very small and reducing strip of green belt between Wickford and Rayleigh.	Stage 2 1 x RED - this site was excluded in the original plan as it was green belt - what has changed that it is no

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		Continue like this together with the housing already planned and there will be continuous housing and industry from Wickford high street all the way to Rayleigh high street.	longer green belt? Nothing that I can see. Stage 3 3 x Amber 1's 4 x Amber 2's and 2 x Amber 3's - what are the detailed plans to address all of these Amber issues? This proposed site adjoins a watercourse along one side, what failsafes are in place to protect the water course and wildlife? What failsafes will be in place to ensure only inert and nontoxic waste is put to this landfill? There have been too many incidents around the country of these failing to protect the residents and environment. This proposed site is too near housing and another waste treatment plant, local resident's health and wellbeing are at risk from cumulative effects of treatment plants and this open air inert waste site with all the dust, noise and traffic that will be associated with it. What would be the plan for the site after the 500,000 tonnes of waste have been put there? What is the plan for the redistribution of the flood waters that would be normally be on this site?
1061726, 216	No	I'm a local resident and I would like to object against using Dollymans Farm as a site for a waste facility for the following reasons: Possibility of long term pollution to land or waterways. The site proposed is too close to residential areas for a waste disposal site. Traffic leading to and from the site would cause congestion in and around our town, which already struggles to cope with the level of traffic at peak times of the day. There are too few open spaces in Shotgate and the proposed site is green belt land and would deprive us of another one. There are 2 war	Locate the site in a less populated area.

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		memorials on the site.	
1061716, , 217	No	<p>I disagree with the proposed siting of Landfill site at Dollymans Farm that is situated on green Belt Land with the entrance off of the A129. This is already a very busy road with traffic from the A1245 and A130 turning off to go to Wickford Town Centre and Shotgate Industrial Estate. When an accident occurs on the A127 or the A13 the A129 becomes completely blocked with traffic trying to go through Wickford to bypass the accident. With the amount of lorries going to the site everyday these will only add to the problem especially as the A129 is a single carriageway. In the Proposed Basildon Plan there is also an area opposite the site for 400 houses that again will add to the traffic on the A129. The various types of proposed waste going to the site could cause problems with leaching into the surrounding fields and water course and there seems no one permanently employed on site to vet the waste going to the infill. The site is also situated next to the main London to Southend railway line with no guarantee that a siding could be installed enabling waste from London. Dollymans Farm has numerous Bridleways that are used by Walkers and Horse Riders that and offers an attractive countryside area. The use of land for the site would curtail the use of these Bridleways. With the amount of notice given to the residents regarding this application it does appear that planning of the site has already been agreed.</p>	<p>The proposed Dollymans Farm site is on Green belt any Waste Disposal site should be sited on a Brownfield site of which there are many in the Essex area.</p>
1061637, 218	No	I wish to express my concerns and objections to the proposed	I believe the proposed landfill at Dollymans Farm should

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		<p>landfill at Dollymans farm. 1. The increase of HGV traffic to the area. 2.The impact this will have on wildlife at this particular site. For example many birds use this area for nesting i.e. Buzzards, Kestrels, (Hedge Sparrows, which have been on decline due to loss of habitat being destroyed ).Egrets, Owls, Gold Finches and many more species of birds, mammals, and insects-all of which will lose habitat. 3 This site is a Greenbelt area which is gradually being reduce over time. A large number of residents use this area and bridle paths for many leisure activities i.e. dog walking, horse riding etc. 4 I have run an equestrian centre in Church Road Rawreth with my family for the last 22 years and we employ and provide employment for 8 people within the business. I hold a Riding School Licence with Rochford District Council and we have 36 disabled riders who ride at the centre each week ( Riding For The Disabled Charity ). We also care for around 30 horses that are on livery at our centre. The owners of these horses ride on the local bridle paths around Dollymans Farm, some of which are public bridleways. The only bridle paths accessible on horseback in our area are on Dollymans Farm. I have many concerns that the loss of these areas would have a direct impact on our business, which might cause the liveries at our yard to move their horses to other locations where there is safe off-road bridle paths. This could result in the closure of our centre and could cause loss of employment for 8 people. It could also mean 36 disabled riders with nowhere to ride, which would be a very sad loss to the Riding For The Disabled and Rochford District Council.</p>	<p>be refused due to the impact it would have on the local area</p>

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1061746, 219	No	<p>Firstly, this proposal seeks to take over an area of Greenbelt and no doubt will set a precedence for the future in that whilst the plan states is for 5-10 years, will never be given back. This is an area regularly used by horse-riders, dog walkers etc. and there is a forest pre-school that uses the site. Also, the site has an historical importance with WWII memorials there. Secondly, whilst the proposal states building rubble what preclusion is there to stop plasterboard and the like being dumped there with the potential to cause asbestos-like powder being released. This is why several other boroughs/counties no longer use landfill, but opt for incineration instead. The increase in traffic will be horrendous and on roads that are already heading towards sink-hole territory. This will only worsen with heavy loads regularly using them. The impact on the housing in Shotgate and Rawreth will be huge and not in a pleasant way. There is also the likelihood of an increase in flooding if this proposal is given the go-ahead again causing huge issues for the existing residents.</p>	<p>The adaptation of this particular site needs to be abandoned and either sited in an area far away from residential homes or further thought given to incineration which again, needs to be away from residential homes.</p>
1061755, 222	No	<p>I have concerns about the impact to the surrounding area including, road infrastructure, green belt land, noise pollution and other facilities in the area (nursery).</p>	<p>Relocation to an alternative site that has better infrastructure in place.</p>
1061752, 225	No	<p>Concerns about the impact on the surrounding area.</p>	<p>Relocation to an area or site that has a better infrastructure in place</p>
1061780, 241	No	<p>It's on green belt land. The additional traffic from the lorries will cause bedlam, Wickford doesn't have the best infrastructure as it is. The A129 will not be able to cope. The smell and possibility</p>	<p>Move it to a more suitable site not on green belt land!</p>

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		of the waste running in to the water ways concerns me a great deal!	
1061786, Rawreth Flood Action Group, 242	No	<p>I do hope that you take into consideration our refusal to accept the site at Dollymans Farm as land fill for inert material. There has been a lack of consultation in as much as the public are unaware of this proposed land fill site. The Localism Act should have public awareness, SC1, Public Community Involvement, Public Consultation and the council must involve the community. There has been a refusal of inert material in the local area that Basildon Council wanted to discharge onto a golf course, this had to be refused by lack of consultation. The case at Dollymans is that Bridleways and Public Rights of Way are very much present and in constant use. Rawreth Equestrian Centre in Church Road use the bridleways as do the owners of horses and other stables at this site. Large lorries and machinery could easily pose a threat to the horses and riders, and during the dry days the dust and fumes from these vehicles may also cause concern to residents locally. There are also concerns that pollutants would enter the North Benfleet and Chichester Brooks, heading to the catchment of the Rawreth Brook and into the Crouch altering our finely balanced Eco systems. The above brook have minnows, sticklebacks, newts and in places voles, egrets and herons as wells as ducks, moorhens who regularly visit to rest. There is also mullet and eels present. Our concern that the bio diversity of the complex water system could be destroyed forever and invertebrates may take a long time to regain a foothold here. There are large volumes of water from</p>	

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		<p>Castlepoint, Bowers Gifford, North Benfleet, Pitsea, Basildon, Saddlers Farm, A1245, A130 with water also being pumped to Rawreth from the Fairglen Interchange which results in flooding. For many years this has been the case and at last we have been in contact with the Environment Agency since 2015 and in discussions with Essex County Council, Rochford District Council and the Cabinet Member for Flooding Roger Hurst who said that at a later date this could quite easily resolve some of the flooding issues in the future as the Government are committed to do and that this would have been an ideal spot just outside the flood zone which is a ready and waiting site to use, this could save the Government millions of pounds in finding alternative flood alleviation sites. If filled in, we could all miss a golden opportunity that is needed in our area. There would also be an opportunity to have a nice feature where wildlife could visit instead of pollutants and methane adding to the pollution where we all live.</p>	
1061784, 243	No	<p>This is green belt and should be kept that way. The traffic and lorries that will saturate the area (A129) will be enormous. Effecting the locality and the environment with added pollution??.. ttf</p>	
1061793, 244	No	<p>We moved to wick because it is a beautiful place to live surrounded by a wonderful countryside, we do not need pollution, bad smells, more traffic... the lorries would cause extra wear and tear to the a129 which would lead to no doubt more horrendous roadworks. we have wonderful schools, parks and</p>	move it away from Wickford!!



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		rivers and do not need the pollution pouting into them!	
1061742, 245	No	Appendix 18 refers to the site as "a former mineral borrow pit." This is misleading as the original planning permission was granted 16 Oct 2001 for a one time project for the removal of clay for engineering fill in for the A130 construction, with restoration to agricultural use afterwards and within 3 years. The Essex County Council Development & Regulation document DR/040/01 submitted as the basis of the planning approval ESS/16/01/ROC / ESS/17/01/BAS allowed for the removal of 550,000 cubic metres of clay and that no waste material would be brought onto the site . Approval was recommended on the basis of exclusively for use as a borrow pit for the A130 project with 2 years to remove material and a year to restore the site. The restoration of the site was completed and is now fully reverted to green belt/agricultural land, and is regularly used by the local community as such.	The site should only be referred to as agricultural land and Green Belt. Any decision to use the site as Landfill should be made purely on the basis of its current Greenbelt situation, not its one time status. The Shotgate community has already suffered and continues to suffer the implications of having a major trunk route built on its doorstep (for the benefit of the wider Essex community). Inflicting a landfill onto the same community simply because we had the required materials to build that road should not be a justification for then disposing of unspecified "inert" material on community used Greenbelt land.
1061812, 247	No	Our roads are congested enough without the added traffic adding to it, the infrastructure around Wickford cannot cope with this, the smell, flies and vermin it will attract are totally unsuitable for a site ne to houses and schools also the risk of contamination to the nearby river	it should be built in an area with enough space around and suitable roads accessing the site
1061807, 248	No	There is already too much traffic around this area with the industrial estate. War Memorials should not be moved. We would be losing even more Greenbelt. The brook could become polluted. The sewage smells in the area. There is a children's	Find another site.

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		nursery on site!	
1061765, 249	No	This is green belt and should remain as green belt. We do not need extra traffic with lorries in this area which will destroy the wear and tear on the a129 thus more roadworks which Wickford does not need! The ECC can't keep on top of repairing the roads as it is. Would be damaging to the area. We have very good schools here, parks, rivers and do not need extra pollution. We already have polluted air from the incinerator plant on the a127, Basildon.	Move it away from Wickford. Please leave our green belt land be.
1061742, 250	No	The Essex County Council Development & Regulation committee document DR/040/01 submitted as the basis of the planning approval ESS/16/01/ROC / ESS/17/01/BAS allowed for the removal of 550,000 cubic metres of clay and that no waste material would be brought onto the site . Approval was recommended on the basis of exclusively for use as a borrow pit for the A130 project with 2 years to remove material and a year to restore the site. The current proposal says "Restoration of the site through this allocation provides the opportunity for biodiversity, landscape and visual enhancement". This wording implies that the site currently offers no biodiversity and that it requires visual or landscape enhancement. This is not the case. In addition the proposals stipulate no specifics for restoration (simply that it would need careful consideration), and there is no timeline for the restoration. Given the landowners previous slow restoration of the site in accordance with the planning permission granted in 2001 - it required an enforcement notice to be issued	Any permission to use of the land for landfill should only be granted after a full consultation on any restoration works that would be undertaken to bring the site to same or better condition as it currently exists. Any restoration work should be clearly documented with both scope and timescales to implement, especially the latter given the landowners previous intransigence in fulfilling planning permission obligations. It should also be clear in the proposal that the current site does not need visual or landscape improvement since it was restored after the original works - the site is Green Belt/Agricultural land in daily use and enjoyment by the local community. If there is a question over the area lacking in biodiversity, this needs to be substantiated. Clarity is required on both the type and the volume of waste to be deposited on the site, and not the weight of the unspecified "inert" material.

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		<p>after "protracted negotiations, between the County Council and the landowner" because "the land continued to remain un-restored in early 2006" which was three years after the required restoration date. (Quote taken from Essex County Council Development &amp; Regulation Committee meeting agenda item 7a DR/046/06). This proposal document also refers to the indicative scale of the landfill being 500,000 tonnes, whereas the original borrow pit site had 550,000 cubic meters of clay removed. Since there is not a clear correlation between the weight of unknown "inert" material to be dumped on the site and its actual volume it is unclear what the eventual landscape would look like. What is the density of the unknown landfill material vs the Essex clay originally removed.</p>	
1061846, 251	No	<p>Wickford does not need this landfill site as we are already polluted enough by the waste recycling plant which blows across from the a127. There is already too much traffic / lorries in the Wickford area with the industrial areas. The roads already can't cope and are breaking up. More lorries dumping rubbish are not needed.</p>	<p>Find a more remote area to dump this rubbish, not a site on top of housing estates.</p>
1061867, 252	No	<p>Restriction of access to Bridal paths for both pedestrians and horses a much cherished local facility plus heavy vehicles and horses a problem mix Approaching the farms entrance from Carpenters Arms immediately under the bridge the slow moving vehicles pulling out from the farm are extremely likely to end in a collision a lot of near misses occur now when drivers get surprised turning the bend and a very visible slow down warning</p>	<p>The void on this site could become a vital part of a flood prevention scheme to mitigate the pressures of the future developments to the East and the West, this could provide a haven for wildlife with creative planting, a scheme far more in keeping with the use of Greenbelt land.</p>

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		<p>sign would be essential. Because of the very gridlocked history of the A129 especially during the commuter period particularly the early rush hour a time restraint to exclude this period would be .(between 0730 -0900 the road into Wickford is total jammed. The proposed total quantity of infill waste would be around 500,000 tons, equal to fourteen 20 ton lorries per day for 5 years. The local housing plan for Shotgate is for 400 new houses plus a large increase for the Rochford area will this should also be taken into account for the effect on the roads. The land at Dollymans Farm is all that remains of a very thin slither of green belt between Shotgate and westward creeping Rayleigh. I have concerns that there is a very real threat of leaching from the site into the North Benfleet/ Rawreth Brook system as the natural drainage from the site is direct into the brook . This leaching could undo some of the recent improvement to the water quality in the River Crouch. In addition, unless the site is strictly controlled with what is dumped there, noxious material under the guise of building waste could find its way under the radar. There are also two very important War Memorials on the land, one of which will fall within the proposed site. The Memorials are dedicated to two Airmen and are of great historic and local interest and are both the subject of funding to restore them over the coming year.</p>	
1061887, 254	No	<p>I would like to state my opposition to the development of Greenbelt land on Dollymans Farm to an infill waste site. I have strong concerns regarding the environmental impact this would have on wildlife, the threat of pollution not only to local</p>	

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		waterways but also from the army of lorries bringing waste to the site. The A129 is a busy road at the best of times, these lorries will have a huge impact on local traffic and cause misery to local residents.	
1061888, 255	No	I do not agree on the proposal going to Dollymans Farm for a waste land. It seems to me that it wasn't included to begin with along with the 18 suggested sites as it was green belt area, but somehow the Landowner has had some sway in the decision and it now in the running. It will devalue property, cause chaos on the roads, noise, pollution, dust, and wear and tear on the roads from the heavy lorries, let alone disrupt a nice peaceful recreational area. Surely it makes sense if it wasn't considered to begin with leave well alone for others to enjoy instead of the LANDOWNER HAVING IT HIS WAY.	
1061890, Rayleigh Town Museum, 256	No	Site: Two Airmen's Memorials, whose location is adjacent to the proposed waste site and individually marked on the accompanying map. Comments: The two sites are small stone/granite memorials, both fenced, erected by the families at the end of WW1, to commemorate a double aircraft crash in March 1918 (the pilots, Messrs Kynoch and Stroud, were returning from a mission over London to intercept and destroy a German bombing attack) Both sites are of considerable local importance and have been in existence since 1918. As such the sites are of national historical significance. Both sites have been the subject of various proposals for restoration and have attracted local, national and political interest. A local historical	

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		<p>society (Rayleigh Through the Looking Glass) with considerable knowledge of the memorials, including verbal historical assurances of their protection, have indicated that plans are held which show proposals for the restoration within one year of today's date. These plans can be made available for viewing. Offers of support have been received from local organisations (with some financial assistance already available) and a number of local councillors have indicated that the sites must be protected, having received many local representations. Mark Francois, the local MP, and Patron of Rayleigh Town Museum, has interested himself in the project from a very early stage and has provided information relating to funding for the restoration via Centenary projects relating to WW1. An Expression of Interest has already been raised with the Heritage Lottery Fund and it is planned that the restorations will be completed by March 2018 (the centenary of the crash). The current owners of the land have already been consulted. It is requested that both sites be respected in the ECC plans for the proposed Waste Disposal Site on farm land belonging to Dollymans Farm and that public access be maintained in any future requests for different site usage.</p>	
1061892, 257	No	<p>I am writing with concern at the proposed Dollymans Farm site being considered for waste disposal . It wasn't originally included in the 18 sites allocated due to it being in an area of green belt. So why was it not rejected when it was NOT one of the sites considered in the first place Obviously green belt area is very important to the environments and residents. It will cause a</p>	

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		lot of upset to the community to all who use the area for their recreation. The roads in and around Rawreth and Shotgate will have more congestion. The Heavy lorries will cause danger, noise and dust. I would therefore like my comments submitted against this proposal.	
1061898, 259	No	Why on earth would anyone want a landfill on what little greenbelt land we have left around Wickford? Hazardous waste? No thank you, bad enough when then smell of waste wafts over us from the Basildon site. Do we really need more heavy lorries trundling around Wickford causing havoc and breaking up the roads that are already in disrepair? No. Wickford infrastructure will not cope with this proposal. It looks like the only people who are agreeing to this are those with a chance of financial gain if it goes ahead. Dollymans farm owner...Hang your head in shame for even thinking of this. Wickford and Rayleigh have been your neighbours for years and now you want to dump this on them. Basildon Councillors, you too should hang your heads in shame because Dollymans Farm wasn't even a consideration until a greedy man approached you.	Re-locate the landfill site to somewhere far away from residential areas.
1061911, 260	No	This landfill is far too close to residential properties and the single carriageway road feeding the site would be insufficient to support the large number of vehicles along with the development of the Rayleigh Side of the carpenters arms this is too much for the area especially in one go the site is on high ground and the smell I believe would travel to the surrounding areas causing distress to residents especially in the shotgate	

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		area the land is actively farmed at the moment so there would appear to be no good reason to turn it over to this purpose	
1061903, 261	No	The road structure around Dollymans Farm will not support the increase in traffic which already struggles to cope when there are issues on the A127. This has a detrimental impact on both Shotgate and Wickford. The inevitable impact of increased traffic, pollution, and loss of green field site status will have a major negative impact on the local economy.	The proposed site needs to be relocated to an area where the impact on residents and businesses can be managed by the building of roads and services to the site.
1061909, 262	No	This site on greenbelt land is totally unsuitable both for the 5 years of dumping and the subsequent activity that the landowner wishes to pursue. Two historical monuments will be destroyed or disturbed by the work Potential pollution of water courses not properly addressed Serious traffic issues around the delivery of waste present insurmountable difficulties; in particular the junction between the site and the A129 is already hazardous and greater use would require installation of traffic lights if it is to be safe. The A129 (Southend Road) through Shotgate and Wickford is an extremely busy route with multiple junctions, crossings and provides access to several schools - the addition of heavy waste delivery vehicles to this would be unsupportable. This could only be negated by banning access from this route. The agreed future construction of c.400 dwellings north of the A129 will further make the area unsuitable for such industrial use as is proposed.	Abandon the proposal



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1061698, 263	No	<p>This site on greenbelt land is totally unsuitable both for the 5 years of dumping and the subsequent activity that the landowner wishes to pursue. Two historical monuments will be destroyed or disturbed by the work Potential pollution of water courses not properly addressed Serious traffic issues around the delivery of waste present insurmountable difficulties; in particular the junction between the site and the A129 is already hazardous and greater use would require installation of traffic lights if it is to be safe. The A129 (Southend Road) through Shotgate and Wickford is an extremely busy route with multiple junctions, crossings and provides access to several schools - the addition of heavy waste delivery vehicles to this would be unsupportable. This could only be negated by banning access from this route. The agreed future construction of c.400 dwellings north of the A129 will further make the area unsuitable for such industrial use as is proposed. Bridle paths lost</p>	flood control projects would be a much more sensible green belt/ nature reserve project
1061915, 265	No	<p>I would like to state my opposition to the development of Greenbelt land on Dollymans Farm to an infill waste site. I have strong concerns regarding the environmental impact this would have on wildlife, the threat of pollution not only to local waterways but also from the army of lorries bringing waste to the site. The A129 is a busy road at the best of times, these lorries will have a huge impact on local traffic and cause misery to local residents. - it's on green belt, possible leeching of contamination into local brook system, increased volume of traffic in already stretched road system A129/A1245, movement</p>	

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		of two WW1 war memorials to airmen,	
1061799, 266	No	I object to proposed landfill at Dollymans farm. Roads cannot cope with huge lorries. Roads in Shotgate already very bad due to heavy lorries constantly passing. Huge cracks in roads now. Worried hazardous waste will be dumped there and fumes will travel to our homes. Nothing should be built on green belt ever! We are losing too much green. We all need to escape to green, clean air spaces.	Find somewhere else that is not green belt. Keep green belt land clear always.
1061921, 267	No	Firstly the use of the land as an inert waste site will have no benefit for Shotgate or the surrounding area. It will not add any value to the area or for those who live nearby and the house prices. The extra traffic using the A129 will pose a risk to the structure of the road and will add increasing pressure on the council to maintain and fix areas due to heavy lorries using the road daily. This increase in traffic will also cause issues for local residents and possible damage to their vehicles from potholes and lose stones. The regular tipping of lorries loads will create loud and infrequent noise to the area as well as dust. This noise and air pollution has no man made barriers in-between itself and my house to stop it travelling . This regular loud noise and dust will create unnecessary health risks which I believe I should not be subjected too. The park in Shotgate is a well-loved and used area for local residents that we feel proud of to use. With such large lorries needing to pass by, I worry that residents- dog walkers, children and others- will be put at risk when crossing the	Another site away from homes.

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		<p>road. I enjoy watching the wildlife from my house window and worry that with the pollution created by such a site, local wildlife will disappear and the area will become inhabitable for creatures that create our environment. The war memorial is something that should not be even allowed to be considered to be disturbed. We are incredibly grateful for our servicemen and destroying such a site seems disrespectful and rude. Finally the original decision by the council , who work for the good of the whole community, was the site was not acceptable for the use of waste disposal. This decision seems to now be considered for reconsideration due to the greed of an individuals need to make money. This is totally unacceptable. I ask you to reconsider for all of the above reasons and selfishly for the health of a child's instead. My child. My son who has cystic fibrosis, a life limiting respiratory condition that will be affected by the needs of one's person need to create income.</p>	
1061923, 268	No	<p>My reasons for disagreeing with the proposal include: - Wickford residents have embraced change over the years, with the development of the Wick, Runwell etc. Roads have not generally not been updated to support, with the entrance and exit to Wickford, often being totally gridlocked on all routes. - It is Greenbelt land which is used regularly by local residents and with several new build estates going up recently in Wickford, there is a significant shortage of this. - I have serious concern around the access to the site (A129) as this road is already severally congested, particularly at peak times. It is also regularly used as an alternative route by many motorists when problems</p>	<p>I feel that the only solution is for an alternative site to be used and the proposal rejected.</p>

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		<p>occur on surrounding roads (eg. A127, A130, A13). - Our local road infrastructure is not suitable to support the high level of heavy good traffic that would be visiting the site. There is evidence of local roads collapsing under current usage which continues to be a problem. - Regardless of instructions, lorries could potentially take the route through Wickford to the site. This leaves the risk of them travelling down roads that were not designed for the weight limit or size of the vehicles. They would pass several schools and small crossings/roundabouts that could cause incidents. - Flooding, noise, wildlife disruption, contamination, devaluing of properties and potential development plans rehousing. - With the impending delivery of Crossrail, Wickford is a town of massive opportunities for commuters to live in a country style setting. I feel these plans could seriously impact people's decision to want to live here, but also equally as important the devaluing of current resident's properties is of serious concern.</p>	
1061925, 269	No	<p>My reasons for disagreeing with the proposal include: - Wickford residents have embraced change over the years, with the development of the Wick, Runwell etc. Roads have not generally not been updated to support, with the entrance and exit to Wickford, often being totally gridlocked on all routes. - It is Greenbelt land which is used regularly by local residents and with several new build estates going up recently in Wickford, there is a significant shortage of this. - I have serious concern around the access to the site (A129) as this road is already severally congested, particularly at peak times. It is also regularly</p>	<p>I feel that the only solution is for an alternative site to be used and the proposal rejected.</p>

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		<p>used as an alternative route by many motorists when problems occur on surrounding roads (eg. A127, A130, A13). - Our local road infrastructure is not suitable to support the high level of heavy good traffic that would be visiting the site. There is evidence of local roads collapsing under current usage which continues to be a problem. - Regardless of instructions, lorries could potentially take the route through Wickford to the site. This leaves the risk of them travelling down roads that were not designed for the weight limit or size of the vehicles. They would pass several schools and small crossings/roundabouts that could cause incidents. - Two war memorials would have to be destroyed/disturbed. This is extremely rude and disrespectful to all of our war heroes and for those who bravely continue to serve. - Flooding, noise, wildlife disruption, contamination, devaluing of properties and potential development plans rehousing. - With the impending delivery of Crossrail, Wickford is a town of massive opportunities for commuters to live in a country style setting. I feel these plans could seriously impact people's decision to want to live here, but also equally as important the devaluing of current residents' properties is of serious concern.</p>	
1061929, 270	No	<p>My reasons for disagreeing with the proposal include: - Wickford residents have embraced change over the years, with the development of the Wick, Runwell etc. Roads have not generally not been updated to support, with the entrance and exit to Wickford, often being totally gridlocked on all routes. - It is Greenbelt land which is used regularly by local residents and</p>	<p>I feel that the only solution is for an alternative site to be used and the proposal rejected.</p>

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		<p>with several new build estates going up recently in Wickford, there is a significant shortage of this. - I have serious concern around the access to the site (A129) as this road is already severally congested, particularly at peak times. It is also regularly used as an alternative route by many motorists when problems occur on surrounding roads (eg. A127, A130, A13). - Our local road infrastructure is not suitable to support the high level of heavy good traffic that would be visiting the site. There is evidence of local roads collapsing under current usage which continues to be a problem. - Regardless of instructions, lorries could potentially take the route through Wickford to the site. This leaves the risk of them travelling down roads that were not designed for the weight limit or size of the vehicles. They would pass several schools and small crossings/roundabouts that could cause incidents. - Two war memorials would have to be destroyed/disturbed. This is extremely rude and disrespectful to all of our war heroes and for those who bravely continue to serve. - Flooding, noise, wildlife disruption, contamination, devaluing of properties and potential development plans rehousing. - With the impending delivery of Crossrail, Wickford is a town of massive opportunities for commuters to live in a country style setting. I feel these plans could seriously impact people's decision to want to live here, but also equally as important the devaluing of current residents' properties is of serious concern.</p>	

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1061930, 271	No	<p>My reasons for disagreeing with the proposal include: - Wickford residents have embraced change over the years, with the development of the Wick, Runwell etc. Roads have not generally not been updated to support, with the entrance and exit to Wickford, often being totally gridlocked on all routes. - It is Greenbelt land which is used regularly by local residents and with several new build estates going up recently in Wickford, there is a significant shortage of this. - I have serious concern around the access to the site (A129) as this road is already severally congested, particularly at peak times. It is also regularly used as an alternative route by many motorists when problems occur on surrounding roads (eg. A127, A130, A13). - Our local road infrastructure is not suitable to support the high level of heavy good traffic that would be visiting the site. There is evidence of local roads collapsing under current usage which continues to be a problem. - Regardless of instructions, lorries could potentially take the route through Wickford to the site. This leaves the risk of them travelling down roads that were not designed for the weight limit or size of the vehicles. They would pass several schools and small crossings/roundabouts that could cause incidents. - Two war memorials would have to be destroyed/disturbed. This is extremely rude and disrespectful to all of our war heroes and for those who bravely continue to serve. - Flooding, noise, wildlife disruption, contamination, devaluing of properties and potential development plans rehousing. - With the impending delivery of Crossrail, Wickford is a town of massive opportunities for commuters to live in a country style setting. I feel these plans could seriously impact</p>	<p>I feel that the only solution is for an alternative site to be used and the proposal rejected.</p>

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		people's decision to want to live here, but also equally as important the devaluing of current residents' properties is of serious concern.	
1061933, 272	No	My reasons for disagreeing with the proposal include: - Wickford residents have embraced change over the years, with the development of the Wick, Runwell etc. Roads have not generally not been updated to support, with the entrance and exit to Wickford, often being totally gridlocked on all routes. - It is Greenbelt land which is used regularly by local residents and with several new build estates going up recently in Wickford, there is a significant shortage of this. - I have serious concern around the access to the site (A129) as this road is already severally congested, particularly at peak times. It is also regularly used as an alternative route by many motorists when problems occur on surrounding roads (eg. A127, A130, A13). - Our local road infrastructure is not suitable to support the high level of heavy good traffic that would be visiting the site. There is evidence of local roads collapsing under current usage which continues to be a problem.	I feel that the only solution is for an alternative site to be used and the proposal rejected.
1061919, 273	No	because this site was not considered in the original consultation and local residents have not been formally notified. It is on green belt land very near to local housing and has two WW1 memorials on it.	I disagree with this site being used and want an alternative site to be used for the following reasons:- This greenbelt land that should not be used. There are public footpaths and bridle ways on the site where many people ride horses and walk their dogs To enjoy the peace and quiet Which would be totally spoiled by this. The bridle path has already been re-rerouted once when they built



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			<p>the a130 so would be unfair to reroute once again There is a children's nursery in very close proximity to the proposed site which prides itself in having the children play outside for three hours a day, how can you put this so close to children? I live nearby and do not want the additional noise, or dust as I have an asthmatic son and am worried about air quality, and smells. I enjoy sitting out in the garden in the summer and do not want this ruined by noise smells and dust. this will devalue property in the surrounding area and no-one had the decency to inform local residents. the a129 is a very busy road already and the extra traffic with large vehicles that this site could bring will cause chaos on a small road that gets traffic jams on at busy times. The a129 has had serious accidents near the junction with the Chichester and i am worried the accident hotspot will be made worse. There are two WW1 memorials that should absolutely not be moved or degraded by having this proposed site anywhere near them, is nothing sacred anymore? There are brooks and a reservoir close by that could be contaminated. This has not been fully considered by anyone at all, as this is so late in the day to add this site that was not included in the original proposal. Please stop this now and do a full and proper consultation, asking local residents, doing proper site surveys etc.</p>

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1061931, 274	No	<p>This area of Essex near Rayleigh, Wickford and Rawreth has, in recent years, been subjected to huge amounts of development. Thousands of houses have been built in the vicinity, and over 1200 more are due to be built in the next few months/years within a very few miles of Dollyman's. The A129 and surrounding roads are constantly under terrible strain already, even before this proposed new plan. The A129 in both directions into Wickford and Rayleigh at busy times is, almost every day, at a standstill or a crawl. Any problem on surrounding roads (A127) causes instant tailbacks. The road can take no more strain. This area is Green Belt and as such needs protecting, The Green Belt around this part of Essex is being encroached on from all directions. Local town councils all wish to preserve remaining areas. The impact on wildlife flora and fauna will be significant and damaging. It is impossible to prevent toxic chemicals released by waste of this type from leaching into surrounding land and waterways over many, many years. This can have terrible consequences on wildlife and also the many homes nearby. The landfill site at Pitsea, some miles away, produces an unavoidable stench which can be smelt from Rayleigh under certain wind and weather conditions. The smell from a site so much closer would be intolerable to many tens of thousands of households. Dollyman's Farm is between two large towns and putting a landfill site between them is irresponsible and unfair to all who live in them. Pollution in this area is currently a major problem already, and is under investigation. There are several schools in close proximity to the road and only a few fields away from the site. Monitoring stations in Rayleigh show it suffers from</p>	<p>This site should not be on Green Belt dividing two large towns at all. It should not be so close to large towns with pollution problems already.. It should be somewhere with purpose built road or rail access which will not adversely affect tens of thousands of families living nearby and using the already struggling road system. This part of Essex is being developed and concreted over at an alarming rate. And all remaining Green Belt and wildlife should be protected.</p>

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		<p>very high levels of harmful airborne pollutants along the A129 through the town centre. Adding so many daily lorry journeys through our busy town roads will exacerbate this problem massively, not to mention these roads are not built to take large lorries which cannot negotiate the twists, turns and mini-roundabouts along the route. Observation on any day would show lorries too large for the road system bouncing up onto pedestrian pavements and crossing into other lanes at junctions, causing drivers to take evasive action. This area around Dollyman's Farm is one of the small number of areas which contain actively used bridlepaths and walkways. Many horses are stabled nearby and lorries of this size moving in and out so regularly, could cause accidents, putting riders and their mounts at risk. At present this is a safe, quiet route to ride on. We personally only found out about this proposed development through Facebook today. Surely a development of this magnitude, with the potential to damage local residents' health and the disastrous effects it will have upon local roads, should have been more publically and widely disclosed? We are strongly opposed to this plan, as are all we speak to.</p>	
1061942, 276	No	<p>This was not in the original plans. Shotgate residents have not openly been informed of this site.</p>	<p>The traffic along this road between Dollymans and Rayleigh is bad enough as it is. Seeing as this is a link road for Chelmsford, Rayleigh the A127 and A13, it's going to make the area a nightmare. The road on Hodgson Way is falling apart again, more than likely due to the heavy goods vehicles that use this road to access the industrial estate. Having this landfill site so close is</p>

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			<p>going to be a problem for several reasons. Health This cannot be good for residents' health Nursery There is a nursery nearby that uses outside space. How can this be healthy for the children Traffic The extra traffic will also affect health the fact this was done in such an underhand way, tells me there would be serious concerns walkers and horses This area is used by horse riders and many walkers. Greenbelt With all the properties going up in the area, we don't have many green belt areas left. Why take what little we do have?</p>
1061939, 277	No	<p>I disagree with this proposed modification as I have several strong concerns. Firstly regarding the environmental impact this would have. This includes air pollution, water pollution and the effect on wildlife. Also recent events have shown that with new waste management projects, in spite of much reassurance from the planners, builders and proposers of these facilities, that it is still very possible they have disastrous contamination to both people and the surrounding area, as has happened with the Tovi waste plant very recently with asbestos. Local people already have to put up with smell from the Basildon plant when the wind is blowing towards Wickford in spite of assurances this would not happen with the new plant. This would be made worse with yet another waste site. Another objection is regarding the already hugely busy A129 where lorries would have a huge impact on the local traffic causing misery to local residents trying to commute and those living along the route that these lorries</p>	<p>I believe this development should not go ahead at this location due to its proximity to existing residential areas already affected by traffic and environmental pollution (smells, dust and noise) which would only further increase. Furthermore would should be trying to keep our Greenbelt land, improving people's quality of life and promoting a healthy living lifestyle, not contaminating residential areas, close to schools and parks. I believe a new site should be found which is located away from residential locations and Greenbelt.</p>

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		would need to take, increasing road and noise pollution.	
1061941, 278	No	<p>I am opposed to this landfill site going ahead as i live backing on to this site and cannot agree with its location, my reasons are</p> <ol style="list-style-type: none"> <li>1)The roads are too busy now without the extra lorries carrying waste to the site, we have limited roads out of Wickford and these get heavily congested and this would just add to that congestion as well as further damage to roads not built for this sort of traffic, we already have problems with the Hodgson Way road leading to the industrial estate which is sinking due to heavy use of lorries to the estate, this would happen along the A129 too, and would cause more problem for Wickford road users.</li> <li>2). I worry about what sort of waste will be dumped there, who is going to be making sure hazardous waste isn't dumped there ? which could lead to pollution of our brooks and streams and wildlife and could potentially lead to hazardous fumes and dust being blown towards the housing developments of which i live, keep it away from local housing it is far too near in my opinion. .</li> <li>3) Many Wickford and shotgate residents walk along the paths and cycle along the route you are proposing not to mention the many riders i see along the way too. There are not many open areas like this in Wickford therefore I do not understand why Wickford seems to be losing all its greenbelt land for housing and now for landfill too, take it somewhere else.</li> </ol>	<p>a landfill site should in my opinion be in an area where there are better roads, no housing developments nearby away from streams and areas which could potentially become polluted with fumes, dust and chemical leaks.</p>
1061946, 279	No	<p>I feel that this particular development is too close to the residential area and also to the reservoir. The roads around</p>	<p>It needs to be built away from residential areas</p>

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		Wickford are extremely busy and the extra trucks traveling on the A129 will make the situation even worse. In the past few years we have lost a lot of our green land due to Wickford being built up and the infrastructure such as roads cannot support it	
1061950, 280	No	Restriction of access to Bridal paths for both pedestrians and horses a much cherished local facility plus heavy vehicles and horses a problem mix Approaching the farms entrance from Carpenters Arms immediately under the bridge the slow moving vehicles pulling out from the farm are extremely likely to end in a collision a lot of near misses occur now when drivers get surprised turning the bend and a very visible slow down warning sign would be essential. Because of the very gridlocked history of the A129 especially during the commuter period particularly the early rush hour a time restraint to exclude this period would be .(between 0730 -0900 the road into Wickford is total jammed. The proposed total quantity of infill waste would be around 500,000 tons, equal to fourteen 20 ton lorries per day for 5 years. The local housing plan for Shotgate is for 400 new houses plus a large increase for the Rochford area will this should also be taken into account for the effect on the roads. The land at Dollymans Farm is all that remains of a very thin slither of green belt between Shotgate and westward creeping Rayleigh. I have concerns that there is a very real threat of leaching from the site into the North Benfleet/ Rawreth Brook system as the natural drainage from the site is direct into the brook . This leaching could undo some of the recent improvement to the water quality in the River Crouch. In addition,	Restriction of access to Bridal paths for both pedestrians and horses a much cherished local facility plus heavy vehicles and horses a problem mix Approaching the farms entrance from Carpenters Arms immediately under the bridge the slow moving vehicles pulling out from the farm are extremely likely to end in a collision a lot of near misses occur now when drivers get surprised turning the bend and a very visible slow down warning sign would be essential. Because of the very gridlocked history of the A129 especially during the commuter period particularly the early rush hour a time restraint to exclude this period would be .(between 0730 -0900 the road into Wickford is total jammed. The proposed total quantity of infill waste would be around 500,000 tons, equal to fourteen 20 ton lorries per day for 5 years. The local housing plan for Shotgate is for 400 new houses plus a large increase for the Rochford area will this should also be taken into account for the effect on the roads. The land at Dollymans Farm is all that remains of a very thin slither of green belt between Shotgate and westward creeping Rayleigh. I have concerns that there is a very real threat of leaching from the site into the North Benfleet/ Rawreth Brook system as the natural drainage

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		<p>unless the site is strictly controlled with what is dumped there, noxious material under the guise of building waste could find its way under the radar. There are also two very important War Memorials on the land, one of which will fall within the proposed site. The Memorials are dedicated to two Airmen and are of great historic and local interest and are both the subject of funding to restore them over the coming year.</p>	<p>from the site is direct into the brook . This leaching could undo some of the recent improvement to the water quality in the River Crouch. In addition, unless the site is strictly controlled with what is dumped there, noxious material under the guise of building waste could find its way under the radar. There are also two very important War Memorials on the land, one of which will fall within the proposed site. The Memorials are dedicated to two Airmen and are of great historic and local interest and are both the subject of funding to restore them over the coming year.</p>
1061995, 281	No	<p>I am writing to complain about the planned proposals for a Landfill Site at Dollymans Farm at Shotgate. It is Greenbelt land and should remain as such, together with all the increase in traffic and heavy lorries at all hours of the day and night, the crushing of concrete, the dust , noise etc. etc. is totally unacceptable. I object strongly and would like my complaints noted. We have horses and ride the bridle paths over there, people walk dogs, fishermen and other leisure pursuits, it would ruin the are completely. The roads in the area are totally gridlocked now so how they will cope with hundreds of heavy lorries I can only imagine what it will be like.</p>	
1061952, 282	No	<p>Not only is this one of the last bits of green belt land between Shotgate and Rayleigh, I live very close to Dollymans farm and</p>	<p>move the proposed to a place that isn't next to a forestry nursery or a residential area.</p>

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		do not want to have to smell the waste that will come from having a landfill site so close to my residential home. My sons' nursery is also located on Dollymans farm and it's a forestry nursery. The children spend lots of time outside, they take walks alongside the stream, look at the horses in the pastures and picnic and learn through play a lot outside. This would do nothing for the children's learning or health to have a landfill site situated right next to them. It would have a huge impact on their health.	
1061947, 284	No	Essex County Council's plans to turn part of Dollymans Farm into a landfill site for construction waste is dangerous for the environment, and will rob local people of the last piece of greenbelt land between Shotgate and Rayleigh. The plans say that an estimated 500,000 tonnes of waste will be put into the site, which will take approximately five years to fill. That averages at fourteen lorries carrying 20 tonnes of waste visiting the site every day for five years. They'd be using the A1245 and the A129, two roads which are already far too busy. Also, the water that currently goes down the old mineral pit will get into nearby streams, which eventually ends up in the River Crouch. This will become unsafe for the local population. Locals walk in this area and horse-riders also use the area on a daily basis, every bit of open land is being taken away and this is unacceptable. There is also a World War One memorial there at the moment which would have to be moved. This is totally unacceptable and is dishonouring those who fought for us and those who continue to fight for this country. I am a local resident and do not want this on my doorstep and object wholeheartedly	This landfill site should be placed elsewhere, away from residential areas and we should certainly not be having to move any war memorials. This is greenbelt land and should not be used for this purpose.



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		to these plans.	
1061945, 285	No	<p>I object in the strongest terms to this proposed modification. The land at Dollyman's Farm is all that remains of a very narrow piece of green belt between Shotgate and Rayleigh. It offers several bridleways and footpaths that are used daily by walkers, dog walkers, cyclists, joggers and horse riders. These are public rights of way, not for any individual landowner to deprive the community of. I, like many others, value this green belt land and ride my horse in the area and along the bridle ways. Contrary to the view of the landowner and Liz Lake Associates, we all enjoy the view and the land offers one of the very few local areas where we can access the countryside and ride safely. It defies belief to suggest that a landfill site would be more aesthetically pleasing!! The proposed use of the land would render the entire bridleway network unusable as using these bridle ways alongside the volume and type of traffic that the proposed development would attract would simply be too dangerous. The proposed "temporary" road dividing BW17 from BW55 would have to be crossed by horses and riders to make them usable, which is just not feasible when a conservative estimate suggests it will be used by fourteen 20 tonne lorries filled with waste each day. There are two livery yards in the local area that would be hugely negatively impacted by this proposal. Across the two, this modification would force up to 70 horses and riders off the bridleways and onto the surrounding roads. This would be dangerous for them and also for car drivers and other road users. The Liz Lake report itself highlights the complexity of the</p>	<p>The development of the Dollyman's site in this way is inappropriate and should be excluded from the Plan. Bridleways and public rights of way are supposed to be protected. Please do so.</p>

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		<p>surrounding road network, including major interchanges that form "significant barriers" to pedestrian and cycle movements. Such barriers present themselves to horses and riders too. So it is accepted that there are no local alternatives to the public rights of way on the Dollyman's site. This, coupled with the fact that speeds on some of the surrounding roads are restricted only to the national speed limit, means that serious injuries to, or even deaths, of horses, riders and possibly also other road users are almost inevitable. The loss of the hacking scheme on Dollyman's Farm would almost certainly result in those who keep their horses in Rawreth moving elsewhere, where they can ride more safely. This would put a local family business out of business and its staff out of work. With it would go the only local Riding for the Disabled centre, depriving 38 disabled riders of the highlight of their week and much needed physical and emotional therapy. Not to mention the likely loss of the Forestry Pre-School, depriving many local children of their right to an early education place and more staff of their jobs. The county council not only has a duty to make provision for waste disposal; it also has a duty to ensure childcare sufficiency that the proposal is not conducive to. in addition, the land is currently home to a number of retired and injured horses who deserve to live out their days in peace and tranquillity as we all do. With limited alternative facilities for equine retirement and rehabilitation, some of these horses may sadly be destroyed if the site cannot be secured, as owners may have nowhere else suitable to keep them. The proposed development would require a new road and bring with it an estimated fourteen 20 tonne</p>	

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		<p>lorries per day. The dirt, noise, disruption and pollution associated with this will ruin this peaceful area. The local road network, which is already gridlocked at peak times, simply cannot withstand any more traffic, particularly not of this nature, and I would respectfully suggest that the Planning Inspector pay a visit to the local area at peak time to see this for herself before making her decision. The landowner has apparently committed to returning the land to green belt however this seems at best unlikely and at worst futile. There is no guarantee that the site will be fully filled and restored within 5 years. Even if it is, by this time, the damage will have been done and these much loved and appreciated facilities and recreational assets will have been lost. The bridleways will have been destroyed, businesses and livelihoods will have been lost and horses will have moved out of the area, leaving no equines to enjoy this lovely land again. Likewise we cannot be confident that compliance with any conditions will be strictly controlled given the conspicuous absence of planning enforcement in the local area. This is not about what's best for Essex. It is motivated solely by money. The land owner has also indicated that they are not averse to importing waste in from London in the medium to longer term. Why should Essex's green belt land become a dumping ground for the capital?!</p>	
1061949, 286	Yes	<p>I am strongly opposed to the development of Greenbelt land on Dollymans Farm to an infill waste site. I have serious concerns regarding the loss of this Green Belt land and its impact on wildlife, the local waterways and the additional pollution</p>	<p>I believe that using our precious and extremely limited Green Belt land is not the way forward. Please consider looking for existing Brown Field sites away from</p>

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		<p>generated by the lorries bringing waste to the site. Roads in and out of Wickford are congested enough and, thanks to all the new houses being built/proposed this will only get worse! I understand there is also a local business, a nursery, who uses this land and promotes outside learning for the children. The loss of this Green Belt land may well affect their business as well and be a potential health risk to the children. Wickford already suffers with air pollution from the waste recycling plant, please don't add to this.</p>	<p>residential areas to use for proposals like this.</p>
1061954, 287	No	<p>Wickford doesn't need the facility. The road network cannot cope with the current traffic let alone an increase in what will occur if the proposed is given permission. The smell, the noise, the pollution a by-product of this suggestion. All of which are negative to the residents.</p>	<p>Don't proceed. It isn't needed.</p>
1061955, 288	No	<p>I disagree with this proposal due to there not being a lot of green belt left in the area and as a local I don't want the area ruined.</p>	<p>Find a more suitable site elsewhere.</p>
1061956, 289	No	<p>Green belt in the area around Wickford is being built on at an alarming rate, Wickford North for example. The authorities need to realise that areas given Green Belt status are given that for a reason and it should not be overruled just because it suits the council to do so. My scout group some years ago enquired about siting a container on our grounds for extra storage, but were told that it was not allowed as it was Green Belt land - now it suits the council (and the land owner wants to make a fortune out of it) it seems ok to change the rules. Also the roads in the surrounding</p>	<p>Delete the option completely!</p>

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		<p>area are falling apart and overcrowded already, adding extra HGV's will only make the situation worse. The consultation says it's to be used for "inert construction waste", this could include anything from a building site, and what safeguards will be in place to prevent unscrupulous operators disposing of Asbestos and other contaminants at the site.</p>	
1061948, 290	No	<p>I strongly do not agree with the M23 proposed modification due to; 1) Not being included within the original plans on waste inert materials. 2) Local residents within a one mile radius have not been informed correctly on this proposal. 3) Site access is off a national speed limit road Potential accident zone with HGVs pulling out. 4) H&amp;S,E is coming down extremely hard on companies/ people who are creating/ disturbing dust particles, due to the proximity of the site this will effect an estimated 8,000 Wickford resident (1 mile radius) 5) Streets will be covered in daily dust making the local area a health hazard. 6) A nursery on the Dollymans site, this will be dangerous for children around heavy machinery entering/ leaving site. 7) as per comment 6, this will be more dangerous for the public picking their children up. 8) This proposal was brought around in a secretive, this seems an area of concern. 9) Local bridleways used by local youth groups for hiking events, hikers, dog walkers, Horses etc. 10) land planned to be used is Greenbelt, this should remain unchanged. 11) a local reservoir is next to the proposed site, this could potentially bring health hazards if contaminated. 12) Rare newts are known to be within the area, with local streams this will set-back the start date of as they will have to be moved. This will</p>	<p>I understand a new inert waste facility will need to be built, however I suggest this needs to be build further away from residents and off green belt. Dollymans Farm should be removed from the list, again. Unfortunately, I believe a decision has already been agreed and made, with all comments being disregarded, I hope you can provide me wrong.</p>

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		<p>make this site unworthy. 13) A planned Wickford/ Shotgate expansion for housing will be within a stone's throw, this will drive house prices down and residents to move away. 14) HGVs could travel through Wickford at times schools are starting/ leaving, this is a serious call for concern. 15) The following type of pollution will drastically increase; water, air, soil, noise, light, emissions, dust, visual, contamination 16) Asbestos could be contained within the broken up materials, these particles are extremely dangerous. 17) Devaluation of entire local area 18) The proposer seems more interested in his own bank role. 19) 2nr war memorials will have to be destroyed/ moved This is very disrespectful and in bad taste. 20) Local infrastructure is already at breaking point. 21) This will have no benefit to the local community. 22) Was previously going to be turned into a steelworkers yard until deal fell through, owner seems to be desperate to get rid of the land by any means. 23) have any plans been made for the topsoil &amp; sub-soil which will need to be removed/ moved? 24) this site is built on a flood risk area, due to the inert material this will make drainage difficult and could put the local area at risk. 25) Groundwater will be contaminated. 26) Date of consultation should have been rearranged (14th February is known people are spending time with others)</p>	
1061958, 291	No	I disagree with proposed land fill site at shotgate Wickford	I disagree due to pollution and as a young person growing up in shotgate Wickford think we should preserving our green belt areas and making our environment a cleaner and healthier place to live

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1061959, 292	No	I disagree with the proposal. This will be using green belt land which needs to be preserved. It will have a detrimental effect on the local environment and the health of local residents causing excessive industrial traffic putting another strain on road infrastructure which is already at full capacity with a number of extra new houses being built.	This proposal needs to be opposed and not granted to proceed.
1061932, 293	No	As a resident of Shotgate I feel that we have had very little information regarding the proposed Landfill site, and I oppose for the following reasons:- - the land is greenbelt. - there are historical war memorials that will be ruined by the work - the A129 cannot cope with the increased traffic flow that will caused by the waste delivery vehicles, along with the plans to build 3500+ houses around the Rayleigh and Wickford. This road will become very hazardous. - the area is used for horse riders, walkers and even a nursery - who use the outside space as a forest school for the children. - the pollution of the water courses has not been taken into account. The smell ( from the burning of the waste products) and noise pollution are all of a negative effect on people's health.	Listen to the residents and abandon the proposal.
1061963, 294	No	Leave greenbelt land alone the traffic in Wickford is bad enough already my partner works over at Dollymans and I have concerns for his health if this goes ahead	
1061965, 295	No	Please give a brief explanation of why you agree / disagree with this particular proposed modification. I am strongly opposed to the development of Greenbelt land on Dollymans Farm to an infill	Losing green belt land in a town that is already suffocating with more and more pollution due to the massive amount of building developments and also the

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		<p>waste site. I have serious concerns regarding the loss of this Green Belt land and its impact on wildlife, the local waterways and the additional pollution generated by the lorries bringing waste to the site. Roads in and out of Wickford are congested enough and, thanks to all the new houses being built/proposed this will only get worse! I understand there is also a local business, a nursery, who uses this land and promotes outside learning for the children. The loss of this Green Belt land may well affect their business as well and be a potential health risk to the children. Wickford already suffers with air pollution from the waste recycling plant, please don't add to this. If you disagree with this particular proposed modification, please give details of what change(s) you consider necessary to resolve the issue raised I believe that using our precious and extremely limited Green Belt land is not the way forward. Please consider looking for existing Brown Field sites away from residential areas to use for proposals like this. View consultation point Table 2 : Main Modifications Comment ID: 286 Response Date: 15/02/17 23:30</p>	<p>waste works at Nevendon is just not right. There are much more feasible options in the area that would affect green belt and would virtually go unnoticed by the public. Why not put it in the country somewhere, Wickford has become an easy target and it's not far.</p>
1061969, 296	No	I disagree with this modification due to the impact it could have on the local environment and area, I also agree completely with comments by the Shotgate parish council	
1061970, 297	No	It will cover the only greenbelt left between shotgate and Wickford. It will also effect the traffic even more.	
1061971, 298	No	I disagree with this as it could have an impact on the local area	



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		and community	
1061974, 299	No	We Loose enough Green Belt Land already - The reason it is marked as Green Belt is to protect it! We do not need another area destroyed, especially as the underground water will eventually reach the Crouch river will cause even more devastation!	Leave Green Belt Land alone!
1061983, 300	No	I have been a Shotgate resident for many years and i feel there has been very little information given about these proposals. They seem to have come out of no-where and I heard via social media. I would object on the following grounds. This land is greenbelt There are two war memorials in the vicinity Increase in traffic, our roads are already congested, especially if there is a problem elsewhere in the area More refuse trucks in the area Possible pollution in the vicinity and to the River Crouch What type of waste will there be Proposal from Basildon Council for yet more house in the areas. Our doctors/schools etc. cannot support more housing	
1061960, 303	No	I ride my horse around the bridal paths at Dollymans Farm, this is the only safe area locally, away from traffic. Many horses are nervous around vehicles, the thought of 20 massive lorries coming towards horse and rider is extremely worrying and potentially fatal to horse and rider. This land is so vital to all those who use it for recreation whether it be walking or riding, we have nowhere else to go it is the only place I allow my children to ride in safety on their own. My youngest daughter has asthma,	Brown sites need to be considered.

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		allowing her to ride in a 'clean' environment gives her so much joy, to take this away would be upsetting. We have so few 'green' areas left, we need to keep these fields for our wellbeing and for future generations to enjoy.	
1061985, 304	No	The proposed site is green belt land that needs to be protected not destroyed by a land fill site. The road infrastructure would not be able to cope with the added traffic in the area. This will also have an adverse effect on the local residents and businesses.	Move the proposed site to a different area that could cope better.
1061985, 305	No	The proposed site is green belt land that needs to be protected not destroyed by a land fill site. The road infrastructure would not be able to cope with the added traffic in the area. This will also have an adverse effect on the local residents and businesses.	Move the proposed site to a different area that could cope better.
1061981, 306	No	I do not agree with the use of Dollymans Farm for the following reasons... *further loss of greenbelt land - we have lost too much in this area already due to major road construction, building and unauthorised fly tipping *the increase volume of heavy traffic, and associated pollution, will badly affect local minor roads already congested at peak times and have an adverse impact on the lives and health of local residents *the increased risk of pollution [noise, dust, chemical, run-off into the local brook and nearby reservoir] *possible re-routing of the bridleway near the site will adversely affect walkers and riders in an area where open countryside has already been badly encroached upon and is at a premium *the adverse effect upon local wildlife from this intrusive change of use	Find a more isolated site where the impact would be less harmful

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1061452, 307	No	<p>I would like to endorse the concerns raised by Rawreth Parish Council and the views held by Shotgate Parish Council with regard to plans being prepared by Essex County Council and Southend Council for waste disposal including land at Dollymans Farm. In particular I would like to mention that : The site was not originally included in the prepared plan because it lies within the Greenbelt. This area of Greenbelt land is used daily by walkers and horse riders and provides an area of attractive, open countryside where members of the public can walk and ride safely. Dollymans Farm offers several bridleways and footpaths running across the land. An access road will cause danger, noise and dust from heavy lorries and will add to an already congested route on the A129. There will be an adverse effect on the landscape. There is potential for leaching from the site. With close railway links at the southern boundary waste from further afield could be transported by the extension of a siding. Two war memorials are on the land which are subject to restoration funding in the coming year. With approved housing plans in the area more investigations need to be carried out to prevent further flooding to an already flood prone area. Please assure me that my concerns, and those of my family, will be taken into account on this important subject.</p>	
1062013, Runwell Parish Council, 308	No	<p>Runwell Parish Council strongly disagree with the change to introduce a new site at Dollymans Farm, Basildon which is situated close to the adjoining Parish of Shotgate, Wickford. We believe the filling of the site could cause flooding in the vicinity, there will be increased traffic volumes on the A129 and there is a</p>	<p>The introduction of the new site at this stage is unnecessary, the previous plan was satisfactory.</p>

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		danger of pollution from the leaching of toxic waste into the Chichester Brook nearby which is a tributary of the River Crouch.	
1061993, 309	No	This site was not considered in the original consultation and local residents have not been formally notified. It is on green belt land very near to local housing and has two WW1 memorials on it.	I disagree with this site being used and want an alternative site to be used for the following reasons:- This greenbelt land that should not be used. There are public footpaths and bridle ways on the site where many people ride horses and walk their dogs To enjoy the peace and quiet Which would be totally spoiled by this. The bridle path has already been re-rerouted once when they built the a130 so would be unfair to reroute once again There is a children's nursery in very close proximity to the proposed site which prides itself in having the children play outside for three hours a day, how can you put this so close to children? I live nearby and do not want the additional noise and am worried about air quality, and smells. I enjoy sitting out in the garden in the summer and do not want this ruined by noise smells and dust. This will devalue property in the surrounding area and no-one had the decency to inform local residents. The a129 is a very busy road already and the extra traffic with large vehicles that this site could bring will cause chaos on a small road that gets traffic jams on at busy times. The a129 has had serious accidents near the junction with the Chichester and i am worried the accident hotspot will be made worse. There are two WW1 memorials that should absolutely not be moved or degraded by having this proposed site anywhere near

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			them, is nothing sacred anymore? There are brooks and a reservoir close by that could be contaminated. This has not been fully considered by anyone at all, as this is so late in the day to add this site that was not included in the original proposal. Please stop this now and do a full and proper consultation, asking local residents, doing proper site surveys etc.
1062007, 310	No	The supporting road infrastructure can hardly cope with the traffic at present and what with the new 500 new builds given the go ahead on Rawreth lane/London Road in Rayleigh this issue will only get worse. What's the point of having protected green belt areas?	Put it somewhere else
1061992, 311	No	M23 - Dollymans Farm I strongly object. This proposed modification should be withdrawn for the following reasons: 1) Green Belt The site is important as part of the remaining protected sliver of land where the green belt is being eroded from both east and west. It has a significant local role for horse riders and as a green lung. As stated by Rawreth Parish Council: "Dollymans Farm offers several bridleways and footpaths running across the land and offers a very unique and much used facility for horse riders in the area. The circuit of bridleways includes a Pegasus crossing that is used to cross the A129, Bridleway 17 which runs past Dollymans farm, Bridleway 55 which runs from Doublegate Lane to Rawreth Barns and across the Rawreth Barn Bridge over the A130 back to the A129 and footpath 19. The use of the land for waste would curtail the use	

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		<p>of these bridleways as the proposed entry to the site from the A129 is very close to the Pegasus crossing and the access road runs parallel to Bridleway 17. Having an access road in such close proximity will cause danger, noise and dust from the heavy lorries, in addition Council are further concerned by the years of disruption this site will cause to residents along London Road."</p> <p>In my experience as district councillor for the past 33 years I have learned that waste sites such as this are a) difficult and time consuming for council officers to monitor and b) tend to remain in use for many years after the intended period. If this modification is accepted, the site may remain open for many years longer than the inspector envisages. 2) Air pollution and noise pollution. I am concerned about the impact on the nearest houses. As this is private land I am not at liberty to wander over the site myself. However I also understand that there are some undocumented uses there, included static caravans used as residences. Also there is a children's nursery (!) :</p> <p><a href="http://www.thetreehouseclub.co.uk/">http://www.thetreehouseclub.co.uk/</a> "Welcome to the multi award winning Treehouse Forestry Nursery and Out of School Club, the first full time forestry nursery in Essex and the greenest eco-friendly child care provision in Billericay. Being situated in the natural beauty of Norsey Woods in Billericay and Dollymans Farm in Wickford, we have over 165 acres of protected historic woodland for our children to explore and learn." 3) Flood risk and water pollution This is a contentious issue that the authorities have been slow to respond to. I am concerned about potential contamination of local water courses. Regarding flood risk, although there has been mention by other respondents that other</p>	

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		<p>hollows could be used for floodwater shortage, it is premature to allocate this site for waste disposal until one of the potential other sites for water storage has been confirmed. 4) Traffic The proposal could cause additional traffic into the residential roads of Rayleigh which are already suffering from increased traffic. Lorries should be required to arrive from the west and leave the site heading west (this is the only way of exercising proper control). Finally, I concur with the comments of Rawreth Parish Council that not enough local knowledge has been passed on to the Inspector. The inspector should investigate further before coming to a conclusion.</p>	
1062022, 312	No	<p>I am responding to the news that Dollymans Farm is being considered for minerals waste. 1. Since we moved to Shotgate in 1971, practically all of the greenbelt has disappeared under housing. This is the last of the local area where you can walk in fields and not along a road. (Apart from the local park). 2. I am extremely concerned about the pollution this could cause. Either in the air or in the water running off into the local brook. As I'm sure you are aware pollution is causing many breathing problems for children and from what I have recently heard, when my nephew was taken to hospital with breathing difficulties two weeks ago, this is already on the increase. 3. The traffic already gets extremely busy through Shotgate, and has been known to come to a complete standstill if there has been an accident locally on the A127 or A130. This would be even worse if there were more lorries coming into the area. 4. I am also concerned</p>	

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		that landfill would affect the drainage in our area and cause flooding. In all I think it is the wrong place to choose for the waste site and hope that you will consider this move wisely. I am sure there are other places in Essex that are more suited to a mineral waste site, that will not affect so many people.	
1062029, 313	No	I wish to register my concerns and objections re the above for the following general reasons: 1. Proposed location in the Green Belt 2. Two important war memorials situated within site 3. Increase in volume of traffic along A129 4. More refuse vehicles in local vicinity 5. Likelihood of pollution outside of site 6. Unknown types of waste to be deposited 7. Liquid seepage from site into local brook 8. A proposed plan by Basildon Borough Council for 400 new-built properties on land which is in close proximity to this proposed waste area site Specifics 1. Network Rail must be approached for comments to protect their land from leakage and debris from the proposed site i.e. high small-mesh chain-link fencing 2. Appendix 18 - Table xx Dollymans Farm You state all access should be via the A129. A. This should be amended to read : Access to site - via A1245 then A129 Access from site - via A129 then A1245 (appropriate signage to be in place) This suggested route will have an impact upon less residential properties than just A129 being shown, i.e. By Pass Junction at Wickford - Southend Road - Shotgate - London Road - Rawreth - Carpenter's Arms roundabout. B. The A129 route, details shown above, covers a section within Shotgate Parish called Southend Road between Baker's Farm Close and Hodgson Way roundabout. Joining this section of the	



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		A129 is a dog-leg shaped route, also called Southend Road (not A129) about 200 metres long, where residential properties , Post Office, shops, doctor's surgery and bus stops are. This has a 7.5 tonne weight restriction for general HGVs apart from those allowed under the relevant Act. Should a blockage occur of the section of the A129 between Baker's Farm Close and Hodgson Way roundabout, HGVs including vehicles bound for the proposed site would not be allowed the facility to travel through Shotgate Village because of the aforementioned 7.5 tonne weight restriction.	
1061597, 314	No	This would be the destruction of an area of green belt land and possible leaching into the river crouch. The increased levels of traffic would be unacceptable as well as the air pollution they would contribute to.	This facility should not be on green belt land or near residential properties.
1061580, 315	No	I would like to register my objections to this proposal. I moved to Shotgate 16 years ago from a London borough because of the appealing open space offered to me to bring my family up. As the years have gone on the green space is getting less due to the new builds appearing. Flooding has increased in the area and I fear that a land fill site would add to the potential of flooding. The road in and out of Wickford can't cope with the traffic as it is, especially if an incident has occurred on the A127 or A130, often leaving Wickford residence trapped in their own town as traffic becomes gridlocked. The increase of heavy industrial vehicles will add to this pressure not to mention the state of the road (Hodgson Way is already breaking up after a	This is green belt land and should remain so. People need to be able to enjoy what little space we have left.

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		<p>major re-surface several years ago. There are also two RAF war memorials within the fields and regularly have wreaths laid at them. It is important to continue the history of our town and pass it down to the younger generations. My daughter is involved in the Air Cadets and we are wondering if the relevant departments have been contacted about the war memorials. Recently a new forest school has opened and they advertise on their website as specialising in outdoor learning, and can often be seen out on walks and picnics enjoying the local wildlife and the field where horses are. I for one would not want a child to attend here if in close proximity of a waste plant... hardly a place to encourage the children to enjoy the fresh air and the environment. The pathways/bridal paths are used regularly by local residents to walk their dogs and horse riders exercising in a safe environment away from the roads. We should be encouraging the youth of today to be outside instead of being inside on electrical devices. If it's taken away what hope do they have. A waste plant would encourage vermin and seagulls to the area and my other concern would be the contamination that may seep into the ground and travel to local stream into the river Crouch causing pollution to the wildlife. I object to this proposal</p>	
1062046, 317	No	<p>I wish to oppose the proposed Dollymans Farm site for mineral waste on the following grounds: Significant risk from asbestos polluting the air Current road infrastructure is not suitable for the volume of traffic that would be experienced Leeching from the infill into nearby watercourses John Spence, Essex County Council Cabinet Member responsible for Planning, said: Should</p>	

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		<p>it be approved, the Dollymans Farm site could be used to dispose of construction and demolition waste, such as bricks, concrete and rubble. As such, residents should not be concerned about potential air pollution or odour issues. By referring to the above statement by John Spence how would checks for asbestos be carried out &amp; at what frequency, in the event of a related case of asbestosis in future years who would be liable for any compensation claims, the claim in the final statement hearing session of the 6th October 2016 states located a long distance from neighbouring properties with regard to that statement what is classed as a long distance and as dust and debris can be carried by the wind clearly has not be taken into account. As there will be no doubt an amount of debris in the air what precautions have been looked at or agreed regarding this debris being blown onto the nearby railway lines.</p>	
1061734, 318	No	<p>I have lived in Wickford for the last 24 years and in Shotgate for the last 12 years. Over the past 24 years, I have seen most of our green spaces in and around Wickford disappear for housing and the like. I have also seen the roads unable to cope, with the Southend road, the main thoroughfare of Wickford being at a standstill from 7.30 to 9.30 and likewise at rush hour the other end of the day. With Nevendon being impassable at all times during the day. The house I live in was built in a breeding ground for toads and I'm sad to say that although this house is about 30 years old, I still find toads on my driveway trying to find a mate. The green space you are proposing building this landfill site on, is one of the few green spaces that the toads,</p>	<p>There were a further 18 brown sites considered, choose one of those.</p>

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		<p>hedgehogs, foxes, rabbits, badgers and the like are still able to call their own. This is before all the other reasons of the fact that a number of retired horses, live their lives over there, people walk their dogs over there, (including me) there is a war memorial that will have to be moved, which in itself is a travesty. Having visited the World War One memorials in Belgium and knowing how they continue to care for them, they would be absolutely horrified that we treat our own memorials in this way! There is also a children's nursery that is wonderful, as it teaches the children about the great outdoors, some of whom would not experience this in other ways. Then there's the noise, the dust, the smells, the leaching in to the streams, which if asbestos is included would poison the water. It is also part of the flood plain of Wickford, so it not only could devalue our houses, but potentially cause flooding near them too. We need to take a stand now and refuse this proposal, as if we start building on green spaces, we might as well say goodbye to other green spaces, what next? Memorial Park? Wick Country Park? How about Lake Meadows? This green space may not be as pretty as the others mentioned here, but building on it would be as massive impact for the local flora and fauna, an ecological disaster in the making.</p>	

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1060492, 319	No	<p>I wish to raise my concerns over the proposed waste disposal site at Dollymans Farm which is currently under consideration. On the original "Replacement Waste Local Plan" 18 sites were listed for consideration. Although the landowner had applied for Dollymans Farm to be included it was excluded on the grounds that the land is designated Greenbelt. That I believe should have been an end of the matter but the landowner lobbied the inspector and somehow managed to get Dollymans Farm added to the list! My first concern is access. This land is now being considered for use as a landfill site, 500,000 tons of building waste over a period of five years. This equates to forty lorry loads of rubble needing to gain access to the site via an already overstretched A129 every day. I foresee a situation where we could find many of these lorries passing through the residential areas of Wickford and Shotgate to reach the site. This would be totally unacceptable and therefore I would propose that, at the very least, for this plan to be passed an access road should be built from the A1245 precluding the use of the A129. My next concern is that the landowner on his application has also applied for the land to be used for the disposal of many other kinds of waste in the future. Passing the current proposal would open the floodgates to this future expansion as it suggests that after this initial five year period of landfill the landowner will simply have a ready-made platform to concrete over to form a hard stand for further "ventures". This opens up further environmental issues. There are a number of brooks running through the land which feed into the River Crouch. Should there be any kind of "seepage" from the site into the brooks the effect on the</p>	

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		<p>environment around these water courses would be catastrophic. Better to use this hollow to manage existing problems in the area with flooding and to create a lake for wildlife and future generations to enjoy. Lastly a personal concern, what affect is this site likely to have on the people of Shotgate? The noise, the dust, the smell. How will it affect the value of our properties?</p>	
1061575, 321	No	<p>I disagree with this proposal. I am currently studying childcare at college and have a very keen interest in the forest school that has opened. I believe that children should learn about their environment and flourish from being outside enjoying fresh air increasing their learning and encouraging positive behaviour. It helps promote a healthy lifestyle and studies show a reduction in child obesity. The children who attend this school are often seen out and about enjoying the horses kept in the nearby field. The increase in heavy lorries will add a health and safety danger to the children and their families who attend as they are encouraged to walk or cycle to the nursery instead of using the car. The bridal paths are often used by dog walkers and horse riders, who can exercise their horses in a safe environment away from road traffic. The roads in and out of Wickford are busy most of the time, adding more lorries will not help, particularly when diversions are in place if the neighbouring main roads have a problem. I am involved with the local Air Cadets and the squadron often remembers the fallen soldiers and lay wreaths at the two war memorials. It is important that the cadets know the history of the town and what happened. Have the relevant authorities been informed or were they just going to be</p>	<p>This is green belt land and needs to be saved, maybe encourage a nature reserve.</p>

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		<p>removed??? As part of my placement work i assist a local childminder and we take the children for walks in the fields or as the children say " the country" to look for signs of nature. The children enjoy running in an open space and we know they are safe. We also attend the local park in Shotgate, this is only 2 fields away from the proposed land fill site. My concern is for the pollution to the ground and air and the increase of vermin. I disagree to this proposal on the grounds of health and safety to the residents and the pollution that it will cause.</p>	
1061728, Shotgate Parish Council, 322	No	<p>Following on from the Parish Council Meeting last night, please see the following objections to the proposed site at Dollymans Farm from Shotgate. The land at Dollymans Farm is all that remains of a very thin slither of green belt between Shotgate and westward creeping Rayleigh. The Parish Council believe the decision to ignore this fact may have been influenced by comments and reports commissioned by the landowner where it is stated that the fact that the land lies within the Greenbelt should not be a considered as relevant, the owner further states in the pre-submission consultation on the waste local plan (2016) that "the site is of poor quality, particularly in terms of visual amenity", in addition the LIVA conducted by Liz Lake Associates states, "The existing landscape amenity of the site has been assessed to offer a limited to negative contribution to the local landscape character of the District. This area of Greenbelt land is used daily by walkers and horse riders, it offers an area of attractive open countryside where members of the public can walk and ride in safety, something that is limited in an area that</p>	

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		<p>offers little other access to green fields and bridleways. Dollymans Farm offers several bridleways and footpaths running across the land and offers a very unique and much used facility for horse riders in the area. The circuit of bridleways includes a Pegasus crossing that is used to cross the A129, Bridleway 17 which runs past Dollymans farm, Bridleway 55 which runs from Doublegate Lane to Rawreth Barns and across the Rawreth Barn Bridge over the A130 back to the A129 and footpath 19. The use of the land for waste would curtail the use of these bridleways as the proposed entry to the site from the A129 is very close to the Pegasus crossing and the access road runs parallel to Bridleway 17. Having an access road in such close proximity will cause danger, noise and dust from the heavy lorries, in addition Council are further concerned by the years of disruption this site will cause to residents along London Road." The landowner also states that "The allocation of Dollymans Farm would not compromise the objectives of the Greenbelt and in the medium to long term once restored would likely result in an improvement to the landscape character." This is highly disputed by the Council as this would indicate that the area would actually be improved by the proposed use, however the loss of the current land far outweighs any possible improvement to the landscape and this is supported by the fact that the total quantity of infill waste would be around 500,000 tons, equal to fourteen 20 ton lorries per day for 5 years. The Parish Council is further concerned by the years of disruption this site will cause to residents along London Road. The access to the site would be from the A129, with a road then running southwards through the</p>	



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		<p>farm to the site. The Council has very grave concerns that there is a very real threat of leaching from the site into the North Benfleet/ Rawreth Brook system as the natural drainage from the site is direct into the brook. This leaching could undo some of the recent improvement to the water quality in the River Crouch. In addition unless the site is strictly controlled with what is dumped there much noxious material under the guise of building waste can find its way under the "radar". The "Site Layout Plan" indicates the areas of the site proposed for the respective uses, however, the landowners have also indicated that they are amenable to increasing the amount of inert landfill subject to Essex County Councils requirements and would also be willing to consider accommodating other waste streams to include non-inert and non-hazardous waste. In addition, while the proposed use of the site is for waste transfer and inert landfill, the landowners are willing to take a flexible approach to prospective uses and to discuss the possibility of locating alternative or additional waste facilities on the site including composting, recycling and energy from waste uses. The landowners and their agents, Strutt &amp; Parker have stated they would be more than happy to enter into discussions with Essex County Council in this regard, and state "If an allocation for the site for a waste use is forthcoming, we intend to enter into detailed discussions with a number of interested operators in the area." This offers little support that the Greenbelt land would remain as such and that it would be restored to its former status. The site offers very close proximity to the Southend Victoria to Liverpool Street line, this lies on the southern boundary of the site and could also provide</p>	

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		<p>the opportunity for a siding off of the railway line as part of a future waste development on the site, and allow for the importation of waste from London and further afield. There are also two very important War Memorials on the land, one of which will fall within the proposed site. The Memorials are dedicated to two Airmen and are of great historic and local interest and are both the subject of funding to restore them over the coming year. The Parish Council feels that not enough local knowledge has been gained by the inspector in considering this proposal and including the site within the plan. Both Rawreth and Shotgate are prone to flooding and with approved plans in both areas for new housing developments more investigations need to take place with regards to the impact this site could have with regards to flood risk. The void on this site could become a vital part of a flood prevention scheme to mitigate the pressures of the future developments to the East and the West, this could provide a haven for wildlife with creative planting, a scheme far more in keeping with the use of Greenbelt land.</p>	
1062124, 338	No	<p>I have the following objections to the potential use of Dollymans Farm for the purpose of waste disposal: 1. This was not part of the original waste disposal plan for Essex (apparently having been added at the behest of the landowner) and would be an unacceptable use of green belt land. 2. Part of the land is regularly used for leisure purposes such as horse riding, rambling and dog walking. 3. Construction waste could contain harmful substances such as asbestos which would obviously represent a health issue. 4. The potentially large numbers of</p>	

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		<p>heavy vehicles would have a significant adverse effect on traffic flow and also the quality of surrounding roads which were not built with this type of usage in mind - Hodgson Way being an example of poor quality issues and requiring continuing repair.</p> <p>5., The increased volume of heavy vehicle traffic would also significantly increase the level of noise and air pollution, particularly affecting those with health issues including COPD. 6. Approval of such a proposal could be seen to set a precedent for further unacceptable use of the land in the future. In view of the above, I strongly recommend rejection of the proposed use of Dollymans Farm for waste disposal or for other environmentally incompatible purposes.</p>	
1062136, 341	No	<p>I think that putting a landfill site at Dollymans Farm would have a dramatic impact on the environment and local areas, the bridleways would have to close due to safety factors, the noise from the lorries and machinery would be a disturbance to the local properties, the public footpaths would also be affected reducing the amount of places one can walk dogs etc. The A129 will not be able to take the extra traffic, the road is in a poor state of repair at the moment and only set to get worse, the lorries flow at the moment is considerably more than the road can take also there's no footpaths on the A129. I was under the impression that the area is GREENBELT and with the spread of Rayleigh and Wickford the little Village of Shotgate will disappear and village life would end.</p>	

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1062154, 344	No	I would like to lodge my objections to the use of this land for waste disposal. The increase in traffic will be horrendous especially when the new houses are built. It may start off as construction waste but who's to say what else will end up there. Some construction waste contains asbestos, so therefore we have a potential health hazard as well. You only have to look at the state of the road in Hodgsons Way mostly caused by lorries To see what potential damage could be caused. Are we not to have any green belt land left in Wickford? Think of the future for the children In this area please.	
1062155, 345	No	I object to the use of Dollymans Farm for waste disposal, this waste could contain lots of health Risks i.e. Asbestos. We already have 400 hundred houses being built in this area causing more traffic, will we end up With another road like Hodgsons Way? It has been in a bad state of repair for so long because of The lorries. Please listen to the voice of the people in this area.	
1062150, 346	No	I have the following objections to the potential use of Dollymans Farm for the purpose of waste disposal: 1. This was not part of the original waste disposal plan for Essex (apparently having been added at the behest of the landowner) and would be an unacceptable use of green belt land. - I am a local resident in VERY close proximity and we were not told or consulted on this but found out via Facebook on 14/02/17 two days before this closes. I consider this a very underhand practise 2. Part of the land is regularly used for leisure purposes such as horse riding,	Use one of the other brown sites - NOT greenbelt.

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		<p>rambling and dog walking. - I have walked my dog along the footpaths/bridle ways on many occasions and the waste plant would absolutely spoil this. 3. Construction waste could contain harmful substances such as asbestos which would obviously represent a health issue. 4. The potentially large numbers of heavy vehicles would have a significant adverse effect on traffic flow and also the quality of surrounding roads which were not built with this type of usage in mind - Hodgson Way being an example of poor quality issues and requiring continuing repair. There is also an accident blackspot just down the road by the Chichester. The road is a very bendy a road not suitable for these types of vehicles. 5.,. The increased volume of heavy vehicle traffic would also significantly increase the level of noise and air pollution, particularly affecting those with health issues including COPD. - My son has asthma and this cannot be good for the air quality. 6. Approval of such a proposal could be seen to set a precedent for further unacceptable use of the land in the future. 7. We already have a waste plant about 3 miles or so away on the A127 which is a new facility which is causing local residents to suffer from the smell and everyone is now complaining of nasty coughs related to this. It was found out a couple of weeks ago that asbestos had already been found dumped there which is totally outrageous as this was not part of the agreement of the facility. We are therefore wondering why we should have another facility so close to this one but specifically for industrial waste. We are obviously concerned that asbestos will be dumped there too. Why should we have</p>	

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		two so close? This should not happen.	
1062161, 347	No	<p>I have the following objections to the potential use of Dollymans Farm for the purpose of waste disposal: 1. This was not part of the original waste disposal plan for Essex (apparently having been added at the behest of the landowner) and would be an unacceptable use of green belt land. 2. Part of the land is regularly used for leisure purposes such as horse riding, rambling and dog walking. 3. Construction waste could contain harmful substances such as asbestos which would obviously represent a health hazard. 4. The potentially large numbers of heavy vehicles would have a significant adverse effect on traffic flow and also the quality of surrounding roads which were not built with this type of usage in mind - Hodgson Way being an example of poor quality issues and requiring continuing repair. 5,. The increased volume of heavy vehicle traffic would also significantly increase the level of noise and air pollution, particularly affecting those with health issues including COPD. 6. Approval of such a proposal could be seen to set a precedent for further unacceptable use of the land in the future. In view of the above, I strongly recommend rejection of the proposed use of Dollymans Farm for waste disposal or for any other environmentally incompatible purposes</p>	

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1062157, 348	No	because this site was not considered in the original consultation and local residents have not been formally notified. It is on green belt land very near to local housing and has two WW1 memorials on it.	I disagree with this site being used and want an alternative site to be used for the following reasons:- This greenbelt land that should not be used. There are public footpaths and bridle ways on the site where many people ride horses and walk their dogs To enjoy the peace and quiet Which would be totally spoiled by this. The bridle path has already been re-rerouted once when they built the a130 so would be unfair to reroute once again There is a children's nursery in very close proximity to the proposed site which prides itself in having the children play outside for three hours a day, how can you put this so close to children? I live nearby and do not want the additional noise, or dust as I have an asthmatic son and am worried about air quality, and smells. I enjoy sitting out in the garden in the summer and do not want this ruined by noise smells and dust. this will devalue property in the surrounding area and no-one had the decency to inform local residents. the a129 is a very busy road already and the extra traffic with large vehicles that this site could bring will cause chaos on a small road that gets traffic jams on at busy times. The a129 has had serious accidents near the junction with the Chichester and i am worried the accident hotspot will be made worse. There are two WW1 memorials that should absolutely not be moved or degraded by having this proposed site anywhere near them, is nothing sacred anymore? There are brooks and a reservoir close by that could be contaminated. This has not been fully

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			considered by anyone at all, as this is so late in the day to add this site that was not included in the original proposal. Please stop this now and do a full and proper consultation, asking local residents, doing proper site surveys etc.
1062172, 349	No	With reference to the recent notification of modification of land at Dollymans farm I feel with not a trace of regret that for the first time I must put my objections to this in writing I feel I should point out that direct members of my family have lived at my address since its construction over 100yrs ago so I have been aware of the erosion of the green belt and subsequent peace and quiet of the region over the years. I feel that the few remaining areas of tranquillity are vital to the country as a whole, in times of the ever increasing tensions a place to escape is vital. Trusting that the views of the local inhabitants will be borne in mind.	
1062193, 357	No	I would like to state my opposition to the development of Greenbelt land on Dollymans Farm to an infill waste site. I have strong concerns regarding the environmental impact this would have on wildlife, the threat of pollution not only to local waterways but also from the army of lorries bringing waste to the site. The A129 is a busy road at the best of times and the junction for Dollymans Farm is not suitable for large numbers of turning lorries. Site is too close to housing. - it's on green belt, possible leeching of contamination into local brook system, increased volume of traffic in already stretched road system	Site needs to be removed from plan.



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		A129/A1245, movement of two WW1 war memorials to airmen,	
1062193, 359	No	I would like to state my opposition to the development of Greenbelt land on Dollymans Farm to an infill waste site. I have strong concerns regarding the environmental impact this would have on wildlife, the threat of pollution not only to local waterways but also from the army of lorries bringing waste to the site. The A129 is a busy road at the best of times, these lorries will have a huge impact on local traffic and cause misery to local residents. The junction of A129 and Dollymans Farm is not suitable for large numbers of turning HGV's - it's on green belt, possible leeching of contamination into local brook system, increased volume of traffic in already stretched road system A129/A1245, movement of two WW1 war memorials to airmen,	Site needs to be removed from development plan
1061988, 360	No	I disagree with this proposal as the site is on green belt and should be moved to a brownfill site option. Building on greenbelt land should only be considered at a last result and not the first option to save costs. Traffic levels will also increase significantly on the A129, which will impact on this busy link road.	
1062186, 362	No	The area in and around Dollymans Farm is green belt land and all we have in the Shotgate area of an unspoilt, peaceful and green area filled with wildlife. The area is also used as a bridle path and by dog walkers. The proposed waste site would cause pollution and no doubt danger to these, not to mention to the nearby residents of Shotgate and Rawreth too. I for one live near this site and don't wish to breath in toxic fumes from a waste	Please use a site already used for waste purposes, and one that is not near a residential area. Keep Shotgate and Rawreth green!

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		ground, not to mention the added noise the site would generate. The roads in and out of the proposed site cannot cope with more traffic as these are already very busy in rush hour, and gridlocked when there are issues on the A130 and A127. For these reasons I wholly oppose to this proposed modification at Dollymans Farm.	
1062203, 363	Yes	I wish to register my strong objection to the proposed siting of a Waste site within the area of the GREENBELT close to local housing in Shotgate. The road servicing Shotgate from Rayleigh and the A127 is very narrow and at times is totally gridlocked from 9am and towards 4.30pm. How we can manage to have extra Lorries accessing a waste site from our road and cope with the weight of heavy industrial transport bringing building rubble to the proposed site will make it impossible to live a normal life. We already have large weight bearing transport accessing the Business Park and the road has suffered yet again with the surface breaking up. The type of rubble brought to the proposed site worries me, How will checks be made for asbestos and other hazardous materials? I would like written confirmation that adequate checks will be done and if this proves wrong or misleading I want to know who will be held responsible for any damage to our health, environment, and expense of clearing up. There is a chance that any water running off the site will contaminate the local brook and cause pollution of not only the brook but other waters and any land crops growing nearby. Some land in Shotgate is prone to flooding, with inadequate provision of proper drainage when the houses were built in the	

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		<p>1980s. The council are also proposing another 400 houses near the Waste site. We have inadequate services in this area with a shortage of doctors, schools, services to look after the elderly, How does the council propose to provide services for all the extra residents . Who wants to live next to a Waste site with the noise and possible contamination. Add the chance of flooding as well will make it a very undesirable place to live. At present there are bridlepaths available long this road, will they still be available with the facilities for all residents to walk long these pathways. I do not believe this is a well thought out proposal and neither do our Parish Council. I shall certainly raise the matter further with my MP as well as the local press.</p>	
1062184, 364	No	<p>I disagree with the proposal because, The road infrastructure in Wickford Shotgate is already suffering and is at gridlock at the moment without having more traffic coming in. Also pollution would be increased think of the surrounding schools in particular affecting the health to nearby children from beauchamps and hilltop schools. Housing in shotgate would be affected more than likely house prices would suffer because who wants to live next door to a rubbish dump!!!! The odour from a landfill site would also be a problem Especially in the summer Shotgate would be affected by a terrible smell. Chemical used at the site would affect the environment and people health.</p>	None I don't want it on my doorstep would you!!!!
1062184, 365	No	<p>I disagree with the proposal because, The road infrastructure in Wickford Shotgate is already suffering and is at gridlock at the moment without having more traffic coming in. Also pollution</p>	None I don't want it on my doorstep would you!!!!

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		<p>would be increased think of the surrounding schools in particular affecting the health to nearby children from beauchamps and hilltop schools. Housing in shotgate would be affected more than likely house prices would suffer because who wants to live next door to a rubbish dump!!!! The odour from a landfill site would also be a problem Especially in the summer Shotgate would be affected by a terrible smell. Chemical used at the site would affect the environment and people health.</p>	
1062180, 366	No	<p>My first comment is that the residents of Shotgate and Wickford have not had sufficient notice of this proposal, and therefore lack the time it will take in order to get everybody's voices heard on the matter. Sadly, I believe this is a deliberate tactic which has been utilised by individuals and organisations in order to benefit financially from a decision which will impact hugely on the surrounding areas and residents' lives and their wellbeing. We live here; we deserve to have some say in the fate of our environment. Councillors - please listen to the views of the people who put you, and keep you, in your jobs. If it goes ahead, the proposed site will:- Devalue local property Danger of airborne chemicals, dust, and asbestos contamination Endanger local businesses who rely on having a quiet, safe and clean environment surrounding them, incl. Livery Yards, and the Treehouse Forestry Nursery School Cause noise and air pollution Increase traffic and place more strain on our already compromised infrastructure Run off and chemical pollution into the stream and River Crouch Network Displace two WW1 War Memorials Destroy Public Bridlepaths and Footpaths Increase</p>	The modification MUST NOT be approved.

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		<p>Flood Risk of an already endangered area  Risk of damage to the railway line which is adjacent to the proposed site  Loss of greenbelt and habitat to wildlife  As well as these implications, there can be no doubt that many more unforeseen issues WILL arise if a landfill site were to be approved at Dollymans Farm. In the end, local councils will lose out, when residents and businesses are eventually forced leave the area after their livelihoods are destroyed by the impact of the site. This will mean those who pay insurance and rates to their local councils, will no longer do so. Whilst waste management facilities are always going to be needed, I feel that the proposed site is TOTALLY unacceptable, inappropriate, and a completely flawed concept. It will result in financial gains for a few, and devastation impact on a huge scale, for local residents, wildlife, and our environment.</p>	
1062208, 367	Yes	<p>I am writing to object to the Dollyman's Farm mineral waste site. My objections to this are as follows. This waste site will increase the traffic on the A129 and in the surrounding areas which will cause great inconvenience for the local people. As well as this the land you plan to use is green belt land so no building should occur in this area. The waste created by the mineral waste site could also include dusts and other polluting materials that could increase the health risks for the local people and potentially cause diseases such as lung cancer. As a result of this the house prices in the surrounding area will decline. I hope that you take my opinion into consideration.</p>	

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1062213, 368	No	I am writing to object about the plans to use Dollymans Farm for waste disposal - I believe this is part of green belt land and as such should be protected especially with such little green space in the Wickford area. The surrounding area is regularly used for leisure purposes. It's potential environmental impact near a populated area of families has significant health implications. I also have concerns about the impact it will cause to traffic in the area. Wickford typically has a high volume of traffic the planned access to the site will cause significant volume to the A129 and surrounding areas. This increase of heavy lorries will also affect the roads which in turn will need repair. The increase in traffic will increase noise and air pollution upon us residents. This newly added proposal that was not part of the original waste disposal plans has significant impact upon local residents and their environment. I feel as a resident here it is an unacceptable plan. Please add my objection to the existing objections made by Rawreth and Shotgate Parish councils	
1062221, 370	No	I do not agree with this and do not wish for this to go ahead. Pollution to the environment and excess traffic in the area are my main concerns.	
1062209, 371	No	1) Given the proposal was added last minute and few residents were informed this is not a very ethical behaviour. 2) The increased traffic on the A1245 and A129, which is busy enough as it is and adding heavy haul vehicles will slow traffic more and could increase the degradation of the road surface. 3)Greenbelt land that is used for dog walking and horse riding, with the WW1	For Dollymans farm to not be considered and another brownfield to be considered.

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		monument there it would also be very disrespectful. 4) Only a desk based Archaeological assessment has been proposed, a full onsite inspection should at least be put into place to find the full extent of preservation required	
1062201, 372	Yes	<p>I am writing to object about the plans to use Dollymans Farm for waste disposal it is my understanding that this is green belt land which is currently being used for leisure activities and provides us the residents with what is much needed green space. It's only a few years ago that the new A130 was built impacting adversely on all the local residents of shotgate resulting in an increase in noise and pollution and now developers intend to load more of this on us . I would be interested in what the current air quality readings are surrounding this area and what the impact of an increase in vehicle emissions will make . I believe that this will have an real negative environmental impact on all us local residents. like many others I am also very concerned about the impact that this will have road congestion on the A129.Currently the roundabout at the carpenters arms is a nightmare at peak commuting times and this will no doubt add significantly to the congestion Not to mention the increase in noise and air pollution upon local residents. Finally it seems that this newly added proposal was not part of the original waste disposal plans and seems to be introduced at the last minute either deliberately or not and I don't believe that the timescales have given the local community enough time to either assess the impact that this may course or</p>	

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		even discuss the matter in depth before this application.	
1062201, 373	No	<p>I am writing to object about the plans to use Dollymans Farm for waste disposal it is my understanding that this is green belt land which is currently being used for leisure activities and provides us the residents with what is much needed green space. It's only a few years ago that the new A130 was built impacting adversely on all the local residents of shotgate resulting in an increase in noise and pollution and now developers intend to load more of this on us . I would be interested in what the current air quality readings are surrounding this area and what the impact of an increase in vehicle emissions will make . I believe that this will have an real negative environmental impact on all us local residents. like many others I am also very concerned about the impact that this will have road congestion on the A129.Currently the roundabout at the carpenters arms is a nightmare at peak commuting times and this will no doubt add significantly to the congestion Not to mention the increase in noise and air pollution upon local residents. Finally it seems that this newly added proposal was not part of the original waste disposal plans and seems to be introduced at the last minute either deliberately or not and I don't believe that the timescales have given the local community enough time to either assess the impact that this may course or even discuss the matter in depth before this application.</p>	Choose alternative low impact site with sufficient time for due local consultation



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1062211, 374	No	<p>I would like to strongly oppose to the proposed plans to remove what limited amount of Greenbelt land left in this area. This area is used daily by the local public for running, dog walking and horse riders for disabled children. There is also Treehouse Day Nursery who are nearby with Preschool age children. Should plans go ahead to build a site for construction waste, I am extremely concerned this may result in bad smells, dust (which would have a huge effect on asthma sufferers) and of course the attraction of vermin. The A129 is the main road I use to drive to work in Rayleigh and pass through here many times a day. This is an already busy road on the best days without rush hour, flooding from rain and no accidents from other roads. As soon as one of these occur, the A129 is immediately effected with painfully slow moving traffic. To add large heavy lorries to this would reduce the flow of traffic down even further.</p>	<p>As this is part of the Greenbelt land left in this area, please can this be protected for the local and future residents and children to continue to use. Please can this be removed from the list of areas to be considered.</p>
1061877, 375	No	<p>I strongly disagree with the proposals being considered for Dollymans Farm. The land is green belt and should be protected, there has already been too much development on green belt around Wickford. The area is used by walkers and horse riders and should be preserved for communal use. The A129 is totally unsuitable for a daily procession of large lorries containing the waste. The road is already under pressure due to continued development in Wickford and Rayleigh with no investment in the road network. Who would police the waste to ensure that it is totally safe? What about dust and air pollution? Would this lead to taking other types of waste? It is too close to housing in</p>	

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		Shotgate and the Wick estate.	
1062225, 376	No	<p>Restriction of access to Bridal paths for both pedestrians and horses a much cherished local facility plus heavy vehicles and horses a problem mix Approaching the farms entrance from Carpenters Arms immediately under the bridge the slow moving vehicles pulling out from the farm are extremely likely to end in a collision a lot of near misses occur now when drivers get surprised turning the bend and a very visible slow down warning sign would be essential. Because of the very gridlocked history of the A129 especially during the commuter period particularly the early rush hour a time restraint to exclude this period would be .(between 0730 -0900 the road into Wickford is total jammed. The proposed total quantity of infill waste would be around 500,000 tons, equal to fourteen 20 ton lorries per day for 5 years. The local housing plan for Shotgate is for 400 new houses plus a large increase for the Rochford area will this should also be taken into account for the effect on the roads. The land at Dollymans Farm is all that remains of a very thin slither of green belt between Shotgate and westward creeping Rayleigh. I have concerns that there is a very real threat of leaching from the site into the North Benfleet/ Rawreth Brook system as the natural drainage from the site is direct into the brook . This leaching could undo some of the recent improvement to the water quality in the River Crouch. In addition, unless the site is strictly controlled with what is dumped there, noxious material under the guise of building waste could find its way under the radar. There are also two very important War</p>	Locate to an area away from housing and possible leaching into watercourse or river.

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		Memorials on the land, one of which will fall within the proposed site. The Memorials are dedicated to two Airmen and are of great historic and local interest and are both the subject of funding to restore them over the coming year.	
1062261, 377	No	I do not agree with this proposal. The site is on green belt and should be moved to a brownfill site option. Building on greenbelt land should only be considered at a last result and not the first option to save costs. Traffic levels will also increase significantly on the A129, which will impact on this busy link road and the town.	
1062264, 378	No	I do not agree with this proposal due to a significant increase in heavy traffic, the fact that the site is on green belt, waste could easily include asbestos, noise levels will increase and dust and other debris will impact on the local community .	
1062108, 379	No	1. The impact on wildlife on this site. 2.The loss of another section of greenbelt. 3. The impact of more HGV on the roads in the area ,air pollution etc. 4 The effect on other business in area. 5. Loss of footpaths and bridleways to local residents and equestrian centres which use them. 6. Will the landowner be prepared to pay for the maintenance and repairs to the public roads if this site is allowed and will they be prepared to pay compensation for noise, environmental pollution, and the loss of trade to business that may be effected by this landfill site be granted.	The landfill should not allowed on greenbelt and should be allocated to more suitable brown field area with less impact on residents and wildlife.

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1062268, 380	No	I do not agree with this proposal. There will be more lorries, more noise and more mess over a significant period of time. There will be a detrimental impact on the local community. The site is green belt and we do not have much of it left in this area.	
1062271, 381	No	This is green belt and should remain as green belt. There are War Memorials on the site and should not be disrupted and is disrespectful to move them. It is far too close to residential properties, schools, preschools. The roads can't cope with the sheer volume of traffic for the Industrial Estate. as it is. Wickford does not need this extra volume of vehicles and it will cause leeching of chemicals into the rivers. Wildlife will suffer, there are riding areas for horses, people walk their dogs. We do not need this.	Look at another site that is not so close to residential areas.
1062278, 382	No	I have many concerns regarding the inclusion of land at Dollymans Farm in the plan for waste disposal up to 2032. The Inspectors comments leading to this modification of the plan to include Dollymans Farm site, assumes that the land would be restored to Green Belt after a very limited 5 year use but the precedent set by the current landfill site at Pitsea, which has overrun by several years, plus the landowners indication to Essex Council that they are amenable to increasing the amount of inert landfill subject to Essex County Councils requirements, and would also be willing to consider accommodating other waste streams to include non-inert and non-hazardous waste. In addition, while the proposed use of the site is for waste transfer and inert landfill, the landowners are willing to take a flexible	Ideally not proceed with allocation.

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		<p>approach to prospective uses and to discuss the possibility of locating alternative or additional waste facilities on the site including composting and recycling facilities and supporting machinery. The landowners willingness to accommodate Essex County Council in expanding the use of the proposed site means it is likely this small remaining strip of greenbelt would be developed further, process more waste types and never be returned to its Greenbelt status. Once a Brown site would be open to a change of use. The total quantity of infill waste would be around 500,000 tons, equal to fourteen 20 ton lorries per day for 5 years. I am concerned therefore by the years of disruption this site will cause to the quality of life of local residents from air and noise pollution from the additional traffic and landfill works themselves throughout the day. This area of Greenbelt land is used daily by walkers and horse riders, it offers an area of attractive open countryside where members of the public can walk and ride in safety, something that is limited in an area that offers little other access to green fields and bridleways. The circuit of bridleways includes a Pegasus crossing that is used to cross the A129, close to the proposed access for waste lorries. I believe the safe and pleasurable use of Bridleway 17, Bridleway 55 and footpath 19 would all be adversely affected and in one case rerouted with the level of dust, noise and unnatural odours being severely impactful. There are also two very important War Memorials on the land which do not appear to have been considered, one of which within the proposed site boundary itself.</p>	

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1062275, 383	No	<p>I wish to express my concerns and objections to the proposed landfill at Dollymans farm. 1. The increase of HGV traffic to the area. 2.The impact this will have on wildlife at this particular site. For example many birds use this area for nesting i.e. Buzzards, Kestrels, (Hedge Sparrows, which have been on decline due to loss of habitat being destroyed ).Egrets, Owls, Gold Finches and many more species of birds, mammals, and insects-all of which will lose habitat. 3 This site is a Greenbelt area which is gradually being reduced over time. A large number of residents use this area and bridle paths for many leisure activities i.e. dog walking, horse riding etc. 4. A new Forest Nursery has recently opened near to the proposed site the ethos of this Nursery is outdoor education and experiences for children - babies to school age. They also run after school Forest School clubs.....how Will this continue if a landfill site is place so close to these facilities 5. There are also two WW1 war memorials on this site - we should be honouring these men and considering the moving or removal of these memorials! 6. The entrance to Dollymans Farm also has a bridle way running right alongside the road.....20tonne vehicles filled with inert waste and horses and riders do not mix - this is a serious accident waiting to happen. 7. The land proposed leeching into the local brook system which in turn feeds the River Crouch which is a tidal system any harmful material leeching into these watercourse will cause wide spread damage.</p>	Remove Dollymans Farm from this plan and find a non-GREENBELT site to use
1062281, 385	No	I object to this because: It is the last bit of green belt left between Shotgate and Rayleigh I regularly walk my dog here I do not	Dolmans farm to be removed from the list of sites

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		agree with the war memorials being disturbed Pollution of the brooks and rivers here There is enough traffic already on this stretch of road and I feel this would add even more to an already congested road	
1062707, 391	No	I wish to object to the planned use of Dollymans Farm to be used as a waste disposal site on the following grounds: It will erode what little green belt is left in the area even further. It will increase the volume of traffic on the A129 to unacceptable levels Loss of bridleways and footpaths as these would be unusable with access given to refuse trucks The possibility of leaching into the Rawreth Brook system as natural drainage is directly into the Brook Both Rawreth and Shotgate are prone to flooding and the risk would be increased with the onset of Brexit, prime farm land where wheat and barley were previously grown will be needed to augment imports historic war memorials are in the area there are very few areas left available to wildlife due to erosion of greenbelt designated land.	
1062720, 393	No	We live on London Road Rawreth and its just come to our notice that there is a proposed waste site to be developed on Dollymans Farm. We cannot object strongly enough about this, we already have lorries from the Hogesons Way industrial estate hurtling past our front. We don't need any more especially waste trucks as they leave most of their load flying out on the road. I walk my dogs round the bridal way and I've wondered what landowners have been doing with a lot of earth moving, its clear not they are making an access road which seems to me that they	

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		are confident of getting planning permission. I dread to think what's going to happen to the First World War memorials that are there it would be sacrilege for them to be damaged or even worse moved. This development must not happen.	
1062731, 394	No	I strongly object to the planning application and comment on the plan as follows: Greenbelt This land is designated greenbelt and the mere fact that the owner makes comment now (money available?) this it is poor quality should be of no relevance to that fact. Should the designation be changes or ignored it may suggest to many that the financial gain to a few is being put at the disadvantage to the many of the general public and bring the whole process of consultation into disrepute. The greenbelt land left between Shotgate and the ever encroaching Rayleigh is now at its shortest and a considerable amount of this owners land adjacent is already planned to have hundreds more houses on it. The countryside as a whole is being phased out to be replaced by concrete or construction serving concrete. Land for wildlife, local amenities in bridleways, footpaths etc. are being lost in general and the loss of such land in this application will indeed effect the aforementioned. Pollution The road where lorries are proposed to deliver/return from the site is already congested at many times of the day. It is very often gridlocked with traffic at a standstill due to constantly being dug up by one or more utility company as well as numerous ongoing repairs throughout the entire route. Flooding by Shotgate Bridge often closes the road completely and all of these occurrences lead to traffic standstill and polluting fumes being discharged. This main	



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		<p>road alone serves many schools and Healthcare homes housing the elderly and vulnerable. In fact, one primary school and a few care homes are actually on the main road itself while other are just alongside. Pollution from the already too many vehicles will be added to by the way of heavy vehicles. This route is massively populated at school times and is walked by shoppers and school children of all ages who will succumb to the pollution from even more traffic. They will also be in danger of accidents due to the increase of not only just regular vehicular traffic but heavy lorries and the odds of an incident must logically increase. Any dust, burning off of waste as laid out in the uses application will only further pollute the air for all those living in the vicinity and let us not forget the houses not yet built have attained planning permission. We already live near to another waste plant in Nevendon and the two combined will no doubt have serious implications on people health, both young and old. This is against government policy on its own merit. Damage to road surface These road are under constant repair already and it is not rocket science to understand that the increase of such vehicles will do further damage and contribute highly to the gridlocking, pollution and repair cost to the highway authority. Planning permission Looking at the planned uses applied for, it does not stop at what has been locally advised to the press as filling in a hole with builders' rubble. The owner applies for other uses such as transfer station, burning of waste and a vehicle scrapyard. By granting him permission for this landfill use, it will also lead him to attain permission for other extreme and damaging uses as set out. The landfill application merely masks</p>	

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		<p>such use! Flooding The mere use of any more builds on greenbelt affects flooding, be it in the nearby house, to the land, planned housing and the general area due to overload on the drains. The water which will be polluted will then run into the drainage and even via the watercourse into our rivers. No meagre amount of diverting a watercourse (just to tick a box) will take away an overall effect. Decision I believe this application was originally discounted but because the owner made direct approach to a government inspector and was able to convince him/her it should be included, we find ourselves having to enter into this debacle. I would surely hope that it is comes to a decision, it must be made by another completely different inspector as to the one agreeing the inclusion. If this is not so, then the public may well think this matter is outside of what the government demands of such matters i.e. completely transparent.</p>	
1062738, 395	No	<p>I am writing to voice my concerns and to ask why the people of Shotgate were not informed earlier about the proposed mineral and waste facility at Dollymans Farm. Apparently, this proposal was discussed in September and October 2016. It was a public hearing but nobody in Shotgate was privy to this meeting as no notices or press releases were issued at this time. The first notice we had was a parish council's flyer about responding to a deadline for reactions to this plan. These had to be received by Essex County Council on 16 February 2017. The flyer did not arrive at our homes until 7 Feb 2017. The next parish council meeting was not until 14 February 2017, giving us two days to</p>	

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		<p>find out about said proposal and send in our reactions. Some people do not have internet facilities and have no means to access any information the only answers we have are the limited details passed on by our parish councillors. On 14 February we were told that an inspector has been asked to make changes to the original plans considering 18 sites in Essex (we knew nothing of these plans). No information was given about the other 17 sites are they still being considered or is the timely representation by Dollymans Landowner the front runner. The landowner is not doing this for nothing, he is doing it for profit. He has no concerns about the view of the people of Shotgate and Rawreth. It is also perfectly obvious that the very quiet low key and quite frankly underhand way this proposal has been handled that the views of the local people are of little importance. I have many objections to the site at Dollymans farm being used: The A129 route is where 7 schools are situated the safety of the children will be compromised if there was any more increases in traffic. It is a residential road and is not built wide of strong enough to take the estimated 14 20ton lorries per day plus the buses, dust carts lorries that don't use the road provided at Hodgson way or the industrial site, cars and other traffic heading for the A130 as well as yes our vehicles. The congestion in this area is at a high already more would hamper the passage of emergency vehicles putting the health and safety of the local people at risk The greenbelt. The land at Dollymans farm is all the is left of a very small slice of green belt between Shotgate and Rayleigh. It does not matter if as the landowner considers it is of poor quality. It is what we have, it may not be the Lake</p>	

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		<p>District but we love it. It is a limited area of open countryside and the bridleway and footpath are used daily by walkers and riders in safety. The proposed plant would limit endanger and spoil the area with noise and dust. There is of course the risk of polluted from noxious material. Hold would this be monitored would all complete loads be tipped out and scrutinised what types of loads if they are from building site would they be sorted we will need to be told exactly what materials will be divided here. This area is subject to flooding more development would increase this risk it would also increase the risk of leaching any noxious substances into the Rawreth brook and hence into the river crouch. There is a plan to build 400 new properties near this site. Who would want to live opposite a dump with a continual train of noisy dirty 20 ton refuse lorries not a great selling point and what about the existing properties they would be devalued who would want to buy a house in congested noisy dirty roads near a mineral waste dump. Will we be compensated for the fall in the value of our property. It would be interesting to know what the other 17 sites feel about this.</p>	
1062742, 396	No	<p>Why should we the residents of Shotgate have 20 ton lorries driving down narrow lanes the public take walks along the lanes this is greenbelt land and shul remain so. Also there are two very important war memorials on the land, two brave airmen whom fought for this green and pleasant land. We will have heavy lorries causing danger dust noise to our little village.</p>	

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1062751, 401	No	I object to the plan of using Dollymans Farm for waste. The roads A1245 A129 will not be able to take this additional loads. The land at present helps to stop flooding due to its position being low. We at present have to put up with noise and pollution to the air from the A1245, we have asked for additional fencing and noise barriers but Essex County Council cannot afford it. The problems on the fire and now asbestos tipping and noxious materials at Michelins farm A127/A1245 have been carried out and you have been unable to stop this. There is still thousands of tyres on this site, when will this land, which is green belt be put back to what it should be. That is why we are unable to trust what you propose.	
1062762, 403	No	I want to object to this site being used as a landfill it will affect protected wildlife in the area and will destroy a bridleway	
1061598, 404	No	I would like to object to the modification 23 related to the proposed landfill site at dolly man's farm. The moving of wars memorials and the future leaching of landfill waste into the water table and into the local streams and Brooks is unacceptable.	
1062769, 406	No	Having received a letter from Shotgate Parish council about the above proposal I feel duty bound to add my comments. It is clear that this is a plan that will directly affect the area and its residents as well as the natural habitat afforded by such green belt space. The potential for this site to be used for the purpose of waste disposal was decided unsuitable and excluded from the list of proposed sites due to its importance as greenbelt. The only	

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		<p>reason this appears to now be in question is purely down to the landowner who clearly does not have any consideration for the locality as far as residents and its natural local flora and fauna. I believe that the landowner's claims that such a development would not compromise the objectives of the greenbelt demonstrates complete ignorance and is actually a contradiction of the terms of greenbelt. Local walkers and horse riders as well wildlife and nearby residents, not to mention road users of the A129 and surrounding road networks would suffer as a consequence of this: Increased traffic, large lorries turning in and out of the access road from A129 causing noise, increased pollution and added hazards to road users. Also destruction of ever decreasing green space. Any site used for waste disposal is at increased risk of causing environmental contamination and its close proximity to waterways is a worry. The control of such waste, particularly building waste which takes many forms, I would imagine is extremely difficult to police and there are no guarantees that unscrupulous dumping of toxic substances will not occur.</p>	
1062770, 407	No	I hereby offer my objection to your proposed waste disposal site. Reference M23	
1062773, 408	No	also opposes this land fill site Ref M23	
1062781, 409	No	Read this article, regarding proposed landfill site at Dollymans Farm. Should be ashamed of trying to do a back door implementation, without proper public consultation. What	

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		happened to fairness and respect for all.	
1062780, 410	No	I am concerned about the flooding in Shotgate my house was flooded in 2014. Also 14 twenty-ton lorries per day for 5 years.	
1062782, 412	No	I object to this proposal.	
1062783, 413	No	I would like to lodge my opposition to the plans for a landfill site at Dollymans Farm in Shotgate, Wickford. I believe a site would have negative impacts on the local environment caused by increased traffic and a high risk of contamination from the site into the local water table and surrounding areas.	
1062786, 414	No	I would like to oppose the development of a landfill site at Dollymans Farm in Wickford. What with 500+ houses being built just off the A129 which will be on the other side of the Carpenters Arms. How is Rayleigh and Wickford going to cope with the extra traffic caused from the houses let alone big lorries coming and going on our small roads. I live just down the road from this site and some days it can take me 40 mins to travel from the Carpenters arms down to my house, a 1 mile journey. Besides, who is likely to buy new houses when they know a landfill site will be just across the road. This is a silly area for this site and you will just ruin all the surrounding towns.	
1061582, 416	No	I write to object to the entire proposals in the above matter as I believe the impact factors will create a tidal wave of heavy traffic in this area and surrounding areas I am concerned that the waste transfer station will have a disastrous effect on local arable land	

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		through leakage through sub soil levels the most concerning is our infrastructure overall will in my opinion fail further and all private residential properties will in my opinion be significantly devalued. The access and proposed routes for this major project will create serious congestion far greater than we are experiencing now including pollution in the atmosphere that will affect all our lives our health and wellbeing.	
1062790, 417	No	1. It is on green belt land, in an area which is already being taken from us for housing. 2. The added traffic would result in even more traffic on very congested roads. 3. This seems to have been pushed through without any consultation.	
1062791, 418	No	I have just read a rather concerning notice about the M23 proposal for Dollymans Farm. I would like to state my objection to this proposal. This would be terrible for the local environment and local wildlife as well as adding a greater burden on the local roads.	
1062794, 419	No	I would like to take this opportunity to express my concerns regarding the proposed use of Dollymans farm as a waste disposal site. It is a poor use of Green belt land which in my opinion has been deliberately kept in poor condition since its reinstatement. Both Shotgate and Rawreth are rural villages which over the past twenty plus years have already been stretched with housing and industrial dwellings, a vast amount located on Philpot land already. We do not need or relish the extra volume of Transport and undoubtedly litter in the area. The	



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		waste will also wash into the local water system entering the River Crouch polluting an already overworked tidal river causing harm to it wildlife and animals that graze the banks. The areas do already suffer from flooding at times and with the loss of even more natural land drainage this is also a concern of mine. Please do not allow this proposal to be accepted as the environmental effect would be catastrophic for the area something the land owners obviously care little about.	
1062795, 420	No	I have lived at this address for 25 years and I wish to strongly object to the plans to modify Dollymans Farm for the use as a landfill site. I feel that the way in this process has been kept under the radar, so to speak, absolutely stinks (Excuse the pun!) Myself and most of my neighbours had no idea about these plans until it was brought to our attention by one of them and we were only informed today, Wednesday 15th February 2017, which was too late to attend the meeting, which it appears was very cleverly arranged for it to be on evening of Tuesday 14th February, obviously coinciding with Valentine's Day, when most couples would be otherwise engaged in celebrating the occasion. Please could you inform me of any further developments regarding this proposal and any future meetings I can attend to voice my objections.	
1062804, 422	No	I am a resident of Shotgate and I am strongly opposed to the plans to create a waste landfill site at Dollymans farm. There are already a lot of heavy lorry movements in the area (which have also seriously damaged the roads) in what is now primarily a	

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		residential area. There are also two valuable first world war memorials on the site. Bearing in mind that this is mainly a residential area with a high number of young families in the area (which will grow considerably with the new housing developments) and the fact that recent studies have shown how dangerous diesel fumes are, I think increasing lorry movements in the area would be extremely irresponsible.	
1062806, 424	No	I would like to formally lodge my objection to the plans for the above development of the Landfill site at Dollymans' Farm. As a resident who lives close by and one of many people that would be directly affected by the increased traffic, desecration to green belt land, pollution threatening not only wildlife but also waterways and the general environment. I would also like to mention that there are two war memorials on site which I strongly believe should not be touched, moved or tampered with in any way, shape or form in respect of the fallen. How these proposals ever got as far as this is totally incomprehensible.	
1062807, 425	No	This is my view to the development of Greenbelt land on Dollymans Farm to an infill waste site. I have great worries regarding the environmental impact this would have on wildlife, the threat to pollution to our waterways also from the large number of lorries bringing waste to the site which would also have huge impact on our local roads, cause more traffic problems and be a complete misery to local residents.	

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1062810, 426	No	<p>I am writing to register my objection to the suggestion of waste disposal or processing at Dollyman's Farm. My reasons are-</p> <ol style="list-style-type: none"> <li>1. This is GREEN BELT land and should remain in this category.</li> <li>2. Dollyman's Farm is not in the original waste disposal plan for Essex. (It is thought this site has been added following a request by the landowner).</li> <li>3. This area is enjoyed for numerous leisure pursuits as there is little land available for Wickford residents to enjoy. At present this green belt area is used by numerous people for fishing, horse-riding (using bridle path), dog walking, hiking and birdwatching.</li> <li>4. Concerns over suggested landfill and how this may adversely impact on the green environment upsetting the natural equilibrium and habitat. Dependant on what is thought suitable as landfill material there is potential for unpleasant substances to be included in hard core such as asbestos/oil or toxins. These toxins could leach through the soil into the water table and local stream, or become airborne particulate matter. Should this occur the legacy would remain for hundreds of years and be a considerable problem for others to inherit.</li> <li>5. The surrounding roads would be used by a considerable number of noisy heavy diesel vehicles creating increased wear and tear. (Hodgson's Way, the entrance/exit to the industrial area, bears testimony to heavy industrial use and is in a dangerous state of disrepair and subsidence). Another side effect could be traffic build up plus increased diesel emission). This activity would cause a detrimental effect on local residents' health, particularly those with breathing conditions, such as Asthma and COPD.</li> <li>6. It was thought that British Rail may have been approached to create a spur line to act as a waste transfer</li> </ol>	

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		<p>station. 7. Although the initial suggestion states the mineral waste site could be used for 5 years it appears from the information available this period could become a much longer and potentially be 'open ended' becoming a larger multi-functional waste processing site. Should this occur this could set a precedent for others to follow. This will have an enormous detrimental effect on the health and wellbeing of Wickford and in particular Shotgate residents. This idea of creating a waste disposal/processing area is abhorrent and caused considerable upset and distress to local residents. I cannot envisage any benefit of this proposal to Wickford residents and may have an adverse effect on future house valuation. I strongly recommend the proposal is rejected for Dollyman's Farm to be used for waste disposal/processing.</p>	
1062812, 427	No	<p>I strongly oppose the proposed modification relating to Dollymans Farm. Pollution from trade waste seeping into the water concourse. The roads surrounding Dollymans Farm are already in a bad state of repair which heavy refuse vehicles would greatly add too. Also these roads are already congested which would be further added to by this modification. It would also produce air and environmental pollution and I would also be extremely concerned if asbestos waste was to be disposed of on or buried in the earth of Dollymans Farm. I feel that the use of this Farm for commercial refuse is too close to residential areas and would also result in house prices in the surrounding area plummeting. I also feel that the proposal for this 'change of use' has been kept under wraps and 'need to know basis'. I feel that</p>	

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		we the residents, have only been notified at the 'eleventh hour' and a meeting held on the 14th of February so that little opposition could be registered. I would also like to make the point that I am surprised that something so significant as using Dollymans Farm as a Commercial and Landfill Site has not been made more public.	
1062815, 428	No	Please add my details to objection list relating to your proposed plans.	
1062820, 430	No	I have viewed the consultation document regarding some of the proposed changes of use. I have significant concerns regarding safety, health, the environment and noise pollution. I live very close to the boundary of the proposed increased use of this land and my property faces on to the trees on the edge of Dollymans farm in Boreham Close. In terms of health. I suffer with Asthma and both my sons suffer with dust allergies. This proposed increase for the next five years. - I understand that the agreement on the quantity of infill waste could amount to fourteen twenty ton lorries per day. The amount of dust/ detritus could significantly impact on my families' health & wellbeing . My neighbours' 7 month old baby has a life limiting lung disease - cystic fibrosis and this could exacerbate his poor health and long term prognosis. In terms of safety - there was a serious accident just last night at the entrance to Dollymans farm. Today there is large pieces of vehicle on the verge at the entrance. The road is a very busy one at peak times and lorries often pull out in to oncoming traffic as they clearly get frustrated at having to wait	

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		<p>for space to get in and out safely. This is clearly going to get much worse with the increased level of traffic and I'm not sure that there are any significant changes that can be made to make this safe for local motorists. To me it appears it will only be a matter of time before lives are lost. I would like some assurance of what measures you think could be put in place to reduce risks to other motorists. My sons and I all work a variety of shift patterns and at times will sleep in the daytime. With the increased noise pollution this could change our whole lifestyle. We chose to live here when we moved to Essex 13 years ago because it was quiet and overlooked green belt land which we assumed meant it wouldn't be built on. I had reservations about the local industrial estate but having spoken to people locally was reassured that in the position we were moving to it was relatively quiet and uninterrupted by noise. This is not entirely true as there is noise from the industrial estate but it is not a Significant problem at present to my sons who sleep at the front of the property. If this planned development goes ahead we will be sandwiched between industrial developments. In reality who would choose to live in this sort of a position so closely on both sides to industrial waste. There have been numerous issues with land locally on the junction of the A127/A1245 and my fear is this could replicate some of those public health issues and risk but at even closer proximity. Personally I would also be very concerned by potential reduction in my property value and will certainly not make this an attractive place to live anymore. I urge you to reconsider changing the current use and not allowing the waste</p>	

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		disposal development to go ahead	
1061944, 431	No	<p>I am writing to formally lodge my objection to the proposals to have a waste site at Dollyman's farm. I live within 500m of the farm and am very concerned about the amount of traffic and fumes that my daughters will be contending with when walking to school every day. It is already an area prone to traffic build up, so having lots more lorries coming down this way will increase both traffic and pollution. Furthermore we as a family are involved with the River Crouch Conservation Trust. We work to keep the River Crouch clean to help the local wildlife flourish. There are many brooks in the Dollymans farm area, and there is a general concern that pollutants will seep into the River as a result of this development. My final key concern is the war memorials. What an absolute disgrace to even think about impacting on these when these people lost their lives in a war which saved Britain from Nazi Germany. This just shows a lack of respect for the victims and their families. I am absolutely against this development and look forward to hearing your response.</p>	
1063115, Hullbridge Parish Council, 432	No	<p>Hullbridge Parish Council wish to object to the proposal for an inert landfill site at Dollymans Farm for the following reasons:          Poor infrastructure Residents Quality of Life jeopardised due to the poor air quality that will be generated by odours from the site.          Environmental impact Contravenes EU Law of such a site being so near to residential areas.</p>	

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1062831, 433	No	<p>I have been made aware of the potential use of Dollymans Farm for the disposal of waste and have the following objections: The proposed site is in the Green Belt classification and used for recreation purposes by walkers and horse riders. Traffic congestion in this area is currently a problem and additional waste disposal traffic will only make the situation worse. Repeated serious problems with the road in Hodgson Way indicate the likely issues of roads in this area. Concerns with pollution from the vehicles used may present health issues. The area has in recent years had a waste disposal incinerator imposed on it with associated concerns about emissions etc. How can it be justified to have another facility in the area ? There will be concerns with the type of waste being deposited and monitoring of environmental effects. In view of these concerns I recommend rejection of the proposed use of Dollymans Farm for any waste disposal.</p>	
1062883, 435	No	<p>With reference to the above proposal, I, like many of my friends &amp; neighbours, strongly object to the council giving permission of approval on the grounds of health &amp; safety, environmental, green belt infringement, and the councils short-sightedness in the future development of Shotgate, Wickford. The road structure in and around Shotgate area are not suitable for additional &amp; heavy traffic because many vehicles get lost through poor road signs and end up around the Avenues of Shotgate similar to what the industrial vehicles are still doing today, after 20 years. To my knowledge the council as not carried out any major road works to the area except resurfacing &amp; emergency repairs &amp; with a</p>	



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		<p>proposal of another 400 new houses within the area, meaning another 800 + vehicles. Your approval of this site would create more pollution and the area will become contaminated, driving residents away from the area. If Essex Council is committed to supply a waste disposal site, I believe they should seriously look for an alternate site before they make a gross mistake.</p>	
1062892, 437	No	<p>I am writing to voice my considerable concerns regarding the prospect of a waste disposal facility at Dollymans farm. This land is green belt land, which should immediately negate any proposals for development. There are very few wild open spaces in Wickford for people to enjoy and this attractive open area is enjoyed by walkers, horse riders and nature lovers alike; I believe there are also public footpaths and bridleways which would be affected by the change of use. Although the proposal states that this is a 5 year plan, I am sure that this figure is impossible to project and can only be estimated, which may lead to an extension of the time used to fill the site. I am also dismayed to hear that the landowner has applied for further use of the land for waste disposal following completion of the initial landfill. As a town Wickford already has issues regarding traffic and is frequently gridlocked. The pollution and inconvenience caused by current traffic is worrying; let alone adding an additional 20 large lorries a day for 5 years. Our homes are in danger of becoming devalued, by these issues I am very concerned about the impact (and danger to people) of this additional traffic upon the A129, a road used by many young families and people walking to and from local schools. I am</p>	

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		<p>aware that there is a supposed weight restriction for this road; however it is no secret that this is largely ignored. Finally I ask you to consider the fact that there are War memorials on this site for two airmen who lost their lives. The inscription on one of these reads "This spot is sacred to the memory of Capt. Henry Clifford Stroud, RFC and RE. Killed in action at midnight 7th March 1918". I find nothing sacred in the plan to dump waste in an area that should be treated with respect and dignity. Perhaps a more appropriate use of the site is to develop it as a proper country park.</p>	
1062896, 440	No	<p>Please register my objection to Modification 23 regarding the Dollymans farm. Not only has this not been made very clear or public knowledge, but it will have a severe impact on the natural landscape, quality of the air and water in the surrounding areas and will destroy what little green space is left.</p>	
1062909, 441	No	<p>I strongly object to the proposed landfill site ,Ref M23, which is being considered on Dollymans Farm. My objections are: The land to be used is green belt and in an area already to be developed for housing, resulting in further air quality problems on already extremely heavily congested roads. The additional traffic of large trucks on overcrowded roads pumping out dangerous diesel fumes, dumping rotting waste near residential area can only lead to more health issues for the local inhabitants. The erosion of Green Belt land without infrastructure improvement in the Wickford, Shotgate, Rayleigh area can only be detrimental to residents now and future Generations This decision appears to</p>	

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		have been pushed through without views and consultation with the people it will effect being heard and considered.	
1062121, 442	No	I wish to object to the RWLP relating to Dollymans Farm Wickford on the grounds that;- 1. It encroaches on precious green belt land. 2. It will create an ongoing traffic problem with heavy lorries using a single carriageway road daily for a period of 5 years - this will eventually be exacerbated by the repairs required to this road as a result of the continued usage by these heavily laden vehicles. 3. The local area will be contaminated by dust coming off the site particularly when unloading is taking place - almost inevitably some of this dust will contain asbestos	
1062915, 444	No	I am writing to urge you to reject the use of Dollyman's Farm, Wickford, as a dumping site for waste material. Here are my reasons: Firstly, there is a real risk of leaching from this site into the North Benfleet/Rawreth Brook system as the natural drainage from the site is direct into the brook. The leaching will pollute the river Crouch with very damaging consequences to the water life ecosystem. Secondly, unless the site is strictly controlled, there is the very real danger that poisonous material will be dumped there under the guise of building waste. The damage that will do to the health of local people and the surrounding environment could be immeasurable. Please reject Dollyman's Farm as a suitable site for dumping waste material.	
1062913, Anglian	Yes	In regards to the new allocation, Dollymans Farm site, there are	

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Water, 447		no Anglian Water assets located on the proposed site.	
1062917, 448	No	<p>Although I don't currently live in Wickford, I am an interested party as I am currently selling my property and will shortly be moving to Shotgate, Wickford. I am writing to register my objection to the suggestion of waste disposal or processing at Dollyman's Farm. My reasons are-</p> <ol style="list-style-type: none"> <li>1. This is GREEN BELT land and should remain in this category.</li> <li>2. Dollyman's Farm is not in the original waste disposal plan for Essex. (It is thought this site has been added following a request by the landowner).</li> <li>3. This area is enjoyed for numerous leisure pursuits as there is little land available for Wickford residents to enjoy. At present this green belt area is used by numerous people for fishing, horse-riding (using bridle path), dog walking, hiking and birdwatching.</li> <li>4. Concerns over suggested landfill and how this may adversely impact on the green environment upsetting the natural equilibrium and habitat. Dependant on what is thought suitable as landfill material there is potential for unpleasant substances to be included in hard core such as asbestos/oil or toxins. These toxins could leach through the soil into the water table and local stream, or become airborne particulate matter. Should this occur the legacy would remain for hundreds of years and be a considerable problem for others to inherit.</li> <li>5. The surrounding roads would be used by a considerable number of noisy heavy diesel vehicles creating increased wear and tear. (Hodgson's Way, the entrance/exit to the industrial area, bears testimony to heavy industrial use and is in a dangerous state of disrepair and subsidence). Another side effect could be traffic build up plus</li> </ol>	

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		<p>increased diesel emission). This activity would cause a detrimental effect on local residents' health, particularly those with breathing conditions, such as Asthma and COPD. 6. It was thought that British Rail may have been approached to create a spur line to act as a waste transfer station. 7. Although the initial suggestion states the mineral waste site could be used for 5 years it appears from the information available this period could become a much longer and potentially be 'open ended' becoming a larger multi-functional waste processing site. Should this occur this could set a precedent for others to follow. This will have an enormous detrimental effect on the health and wellbeing of Wickford and in particular Shotgate residents. This idea of creating a waste disposal/processing area is abhorrent and caused considerable upset and distress to local residents. I cannot envisage any benefit of this proposal to Wickford residents and may have an adverse effect on future house valuation. I strongly recommend the proposal is rejected for Dollyman's Farm to be used for waste disposal/processing.</p>	
1062921, 449	No	<p>As a horse owner and rider our off road riding is very limited and this proposed modification would take this area away from us and the lorries bring in the materials could be very dangerous and frightening to the horses therefore increasing our risk of accidents</p>	
1062935, 452	No	<p>This area should not be exposed to yet more environmental disruption. We have a large industrial works and water treatment plant already the added HGV vehicles would congest the already</p>	<p>Remove the Dollymans Farm modification from the proposal.</p>

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		heavily used roads with the added dangers these types of vehicles pose.	
1062942, 456	No	I think there is already enough environmental disruption in this local area. We already have the water treatment works and industrial buildings which in turn generate an already intolerable number of HGVs using the local road infrastructure.	Remove Dollymans Farm from the Plan
1062298, 460	No	The proposed Dollymans Farm site is within a designated Green Belt Area. It should continue to be protected as such. There would appear to be a risk of leaching into the sensitive North Benfleet & Rawreth Brook Systems. No clear plan on management of local run-off water, which regularly pools in the proposed area. This potentially exacerbates the leaching problem above. Displacement of two War Memorials	Removal of site M23 Dollymans Farm from the list of proposed sites. I would prefer that the Authority had a greater focus on recycling waste with a concerted effort to move away from landfill solutions.
1062951, 463	No	I am opposed to the M23 landfill site proposal in Wickford. I am a resident of 36 years and have a young family.	
1062010, 464	No	Your web site for objecting is not user friendly hence my email. I wish to object to the proposed waste facility at Dollymans Farm for the following reasons: 1. There is not enough infrastructure in place in Wickford to support any further development whether that development be residential or commercial. Vehicles accessing this site will large and frequent. Our roads are not suitable. 2. Contamination issues due to waste seeping into local rivers. 3. WW1 memorial is on this site. 4. Wildlife and recreation ground will be lost. 5. This site is green belt! Protect it!	

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1063282, 465	No	I wish to oppose to the above being a landfill site. We in Wickford are fed with the over building of new properties in the area, we are over populated in the area causing traffic issues constantly coupled with the pollution and a blot on the landscape.	
1063346, 471	No	With regard to the above, I am writing to register my objection to the proposal within the Replacement Waste Local Plan to use Dollymans Farm as a waste disposal site. The land proposed is green belt. In addition, the roundabout by The Carpenters Arms pub, at the junction of the A129 and A1245, is dangerously busy, particularly at peak times, and additional slow-moving waste lorry movements going to and from the site would cause further congestion and risk of accidents. Lorries coming and going in the opposite direction towards and through Wickford via the A129/Southend Rd, would also be traversing a thoroughfare that is at times undulating, twisting and again, very busy at peak times. It is a residential road serving Mayflower school, so heavy lorry movements on it would be both dangerous and ruin the amenity of people's homes along the Southend Road. Although I live just across the Borough boundary, the proposed waste site would have a direct impact on my locale and the routes that I and my family use almost every day.	
1063383, 483	No	I wish to lodge my objection to the above modification to include Dollymans Farm as a possible site for a waste dump. I object to the use of this Green Belt land for this purpose and believe the development of the site in this way is inappropriate. I like many others value this green belt land and walk my dog and ride my	

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		<p>horse in the area and along the bridleways. I enjoy the green view and it is one of the few places in the local area where I can access the countryside and walk and ride safely. The development requires a new road and all the dirt, noise and disruption that this would bring to this relatively peaceful area will entirely ruin it. Once the land is allocated for waste I do not believe it will be restored to its current green use. We have little enough access to the countryside in this built up area so please protect this area.</p>	
1063385, 486	No	<p>I wish to lodge my objection to the above modification to include Dollymans Farm as a possible site for a waste dump. I object to the use of this Green Belt land for this purpose and believe the development of the site in this way is inappropriate. I like many others value this green belt land and walk my dog and ride my horse in the area and along the bridleways. I enjoy the green view and it is one of the few places in the local area where I can access the countryside and walk and ride safely. The development requires a new road and all the dirt, noise and disruption that this would bring to this relatively peaceful area will entirely ruin it. Once the land is allocated for waste I do not believe it will be restored to its current green use. We have little enough access to the countryside in this built up area so please protect this area.</p>	
1063388, 487	No	<p>I wish to lodge my objection to the above modification to include Dollymans Farm as a possible site for a waste dump. I object to the use of this Green Belt land for this purpose and believe the</p>	



Person ID, Organisation, Comment ID	Do you agree with proposed modification M23?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>development of the site in this way is inappropriate. I like many others value this green belt land and walk my dog and ride my horse in the area and along the bridleways. I enjoy the green view and it is one of the few places in the local area where I can access the countryside and walk and ride safely. The development requires a new road and all the dirt, noise and disruption that this would bring to this relatively peaceful area will entirely ruin it. Once the land is allocated for waste I do not believe it will be restored to its current green use. We have little enough access to the countryside in this built up area so please protect this area.</p>	
1063392, 489	No	<p>I wish to lodge my objection to the above modification to include Dollymans Farm as a possible site for a waste dump. I object to the use of this Green Belt land for this purpose and believe the development of the site in this way is inappropriate. I like many others value this green belt land and walk my dog and ride my horse in the area and along the bridleways. I enjoy the green view and it is one of the few places in the local area where I can access the countryside and walk and ride safely. The development requires a new road and all the dirt, noise and disruption that this would bring to this relatively peaceful area will entirely ruin it. Once the land is allocated for waste I do not believe it will be restored to its current green use. We have little enough access to the countryside in this built up area so please protect this area.</p>	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M23?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
1063397, 490	No	<p>I wish to lodge my objection to the above modification to include Dollymans Farm as a possible site for a waste dump. I object to the use of this Green Belt land for this purpose and believe the development of the site in this way is inappropriate. I like many others value this green belt land and walk my dog and ride my horse in the area and along the bridleways. I enjoy the green view and it is one of the few places in the local area where I can access the countryside and walk and ride safely. The development requires a new road and all the dirt, noise and disruption that this would bring to this relatively peaceful area will entirely ruin it. Once the land is allocated for waste I do not believe it will be restored to its current green use. We have little enough access to the countryside in this built up area so please protect this area.</p>	
1063407, 491	No	<p>Green belt land that should be left as it is as too much of it in this area has already been given up. I'm concerned that this may pose a health risk to that of the local environment and its occupants. Pollution in all its forms is unsafe, particularly when it happens to be next to a children's nursery. The roads and infrastructures are not in place to be able to support this proposal.</p>	
1063413, 492	No	<p>I wish to lodge my objection to the above modification to include Dollymans Farm as a possible site for a waste dump. I object to the use of this Green Belt land for this purpose and believe the development of the site in this way is inappropriate. I like many others value this green belt land and walk my dog and ride my</p>	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M23?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>horse in the area and along the bridleways. I enjoy the green view and it is one of the few places in the local area where I can access the countryside and walk and ride safely. The development requires a new road and all the dirt, noise and disruption that this would bring to this relatively peaceful area will entirely ruin it. Once the land is allocated for waste I do not believe it will be restored to its current green use. We have little enough access to the countryside in this built up area so please protect this area.</p>	
1063417, 493	No	<p>I wish to lodge my objection to the above modification to include Dollymans Farm as a possible site for a waste dump. I object to the use of this Green Belt land for this purpose and believe the development of the site in this way is inappropriate. I like many others value this green belt land and walk my dog and ride my horse in the area and along the bridleways. I enjoy the green view and it is one of the few places in the local area where I can access the countryside and walk and ride safely. The development requires a new road and all the dirt, noise and disruption that this would bring to this relatively peaceful area will entirely ruin it. Once the land is allocated for waste I do not believe it will be restored to its current green use. We have little enough access to the countryside in this built up area so please protect this area.</p>	
1063451, 495	No	<p>I wish to lodge my objection to the above modification to include Dollymans Farm as a possible site for a waste dump. I object to the use of this Green Belt land for this purpose and believe the</p>	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M23?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		development of the site in this way is inappropriate. I like many others value this green belt land and walk my dog and ride my horse in the area and along the bridleways. I enjoy the green view and it is one of the few places in the local area where I can access the countryside and walk and ride safely. The development requires a new road and all the dirt, noise and disruption that this would bring to this relatively peaceful area will entirely ruin it. Once the land is allocated for waste I do not believe it will be restored to its current green use. We have little enough access to the countryside in this built up are so please protect this area.	
1063482, 496	No	Opposed to this plan	
1063440, Natural England, 499	No- subject to amendments	<p>We understand that this site was not allocated at the pre-Submission phase. This allocation should be subject to Habitats Regulations Assessment in order to demonstrate that it would not have an adverse effect on European sites. We note that the future restoration provides the opportunity for significant biodiversity enhancement and habitat creation, and would advise that this should follow the opportunities presented in our evidence description of the Northern Thames Basin National Character Area.</p> <p><b><u>UPDATED RESPONSE: March 2017</u></b></p> <p>We note in the Habitats Regulations Assessment Addendum for Dollymans Farm L(i)16 (v1.3 dated, 10th March 2017) the assessment has screened out likely significant effect. The</p>	<p>We make two recommendations:</p> <ol style="list-style-type: none"> <li>1. that the HRA Addendum be amended to include screening against FLL (our advice being that this can be screened out);</li> <li>2. that any project-level HRA consider FLL within the assessment and demonstrate no adverse effects on the integrity of any international site. Evidence will change over time regarding the preferences of species such as the Dark-bellied Brent Geese, so appropriate foraging distances should be reviewed as part of any HRA.</li> </ol> <p>On the basis that your council is able to follow the two recommendations above, then Natural England is</p>

Person ID, Organisation, Comment ID	Do you agree with proposed modification M23?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>Council, as competent authority must make the decision whether a plan or project is likely to have a significant effect on a European site, or will adversely affect the integrity of a European site. The screening assessment in Table 8 concludes no likely significant effect on basis of:</p> <ul style="list-style-type: none"> <li>• the inert landfill screening distance parameters for European sites; and</li> <li>• ground and surface water protection measures.</li> </ul> <p>Neither Table 8 nor paragraph 4.2 consider ‘functionally-linked land’ (FLL). FLL describes areas of land or sea occurring outside of a designated site which nonetheless are considered to be critical to or necessary for the ecological or behavioural functioning in a relevant season of a qualifying feature for which that site has been designated.</p> <p>Crouch and Roach Estuaries SPA and Ramsar is of importance for wintering waterbirds, especially Dark-bellied Brent Goose <i>Branta bernicla bernicla</i>. Dollymans Farm is situated about 2.6km from the Crouch and Roach Estuaries Special Protection Area (SPA) and Ramsar site and the Essex Estuaries Special Area of Conservation. We consider that such a distance is beyond the currently understood foraging preferences for Dark-bellied Brent Geese and therefore it would not appear that Dollymans Farm would be suitable functionally-linked land at such a distance. We have not assessed the current habitat regarding suitability as FLL.</p>	<p>satisfied with the current assessment of Dollyman’s Farm and its conclusions. For avoidance of doubt we support the continued reference to Northern Thames Basin National Character Area.</p>

Person ID, Organisation, Comment ID	Do you agree with proposed modification M23?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
1064025, 507	No	Please note that I feel that your plans for a land fill site at Dollymans Farm is inappropriate and wish to register mine and my wife's objection.	
1064243, Historic England, 530	No	We welcome efforts to protect archaeological deposits where this site is to be excavated. To ensure that these deposits are not unnecessarily disturbed, we request the following amendment. Areas of archaeological deposits in situ will require excavation and recording if working is likely to cause detrimental disturbance in the north western part of the site.	
1064297, 536	No	I live very close to the site, I am very concerned on increased traffic and the effect it will have on the land ,flooding, smell, wild life and the possible decrease in the price of our houses as one of the reasons to move here was the green belt location.	
1064318, 538	No	I would like to object to the above. If this goes ahead it will cause water pollution, increased traffic and pollution, likelihood of increased accidents, removal of war memorial (heritage site) foul smells from decomposing waste, and the build-up of methane cases amongst other things.	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M23?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
1064376, 541	No	<p>We would like to state our strong opposition to the proposal for a landfill site off Greenbelt land on Dollyman's Farm. We believe this is not a suitable site for landfill due to strong concerns for the environmental impact this would have on the local area: This is a heritage site, an important war memorial stands on the land and another close by, these must be protected. The threat of pollution to local waterways where rainwater and flood water can pick up contaminants from the waste as it flows across the surface of the landfill and pollute the water courses when it drains from the site causing leachate. We understand the government have undertaken extensive surveys on current landfill sites and over half experienced leachate with no action taken to control this. Landfill sites often generate objectionable smells due to the decomposition of waste and there will be terrible problems of noise, dust, vibration, traffic congestion from the many lorries taking waste to the site which will increase in the likelihood of accidents in the area. Landfill sites can cause serious pollution of rivers, streams and ground waters. Landfill sites generate gas, especially methane, as waste decomposes. Methane is an important greenhouse gas contributing to climate change. We must reduce the amount of greenhouse gases that are emitted into the atmosphere. Methane is also a dangerous explosive gas. Furthermore this proposal will drastically affect local business such as the day care nursery proposed nearby.</p>	

### Modification M24 – Table 21 Development in Waste Consultation Areas

Person ID, Organisation, Comment ID	Do you agree with proposed modification M24?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
735401, Basildon Borough Council, 137	Yes	Support this change as it will reduce the unnecessary administrative burden for Local Planning Authorities to consult the Waste Planning Authorities on the change of use, if there is not likely to be an impact on waste management facilities.	



## Modification M25 – Table 21 Development in Waste Consultation Areas

No Comments Received

## Modification M26 – Oakwood and Crusader Business Park

Person ID, Organisation, Comment ID	Do you agree with proposed modification M26?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
1063382, Tendring District Council, 482	Yes	Main modification 26 recommends the removal of Oakwood and Crusader Business Park as the site is no longer being considered as an Area of Search. This modification would address the Council's first objection previously raised. TDC therefore withdraw this ground for objection.	Given the above proposed modifications, TDC consider the Replacement Waste Local Plan Schedule of Modifications to be sound. TDC also recommends continued involvement of its members, land owners and town councils in the waste local plan process to ensure its deliverability.

## Minor Modifications

### Modification M27 – Paragraph 4.11

Person ID, Organisation, Comment ID	Do you agree with proposed modification M27?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
910743, Cumbria County Council, 38	No	Firstly, I think it would be clearer if the terms nuclear waste and non-nuclear waste were amended to read "nuclear industry waste and non-nuclear industry waste. Secondly, nuclear (industry) wastes are actually from a broader range of sources than just the nuclear power industry for example, they are also from products that contain radioactive substances (smoke detectors, pace-makers, some ceramics, etc.) or from mineral extraction/processing (NORM) and non-nuclear (industry) wastes also include research establishments. I'm not sure where defence-related radioactive wastes lie, probably nuclear industry. However, if your text is meant to refer only to those radioactive wastes that arise or are managed in Essex, then you could simply add In Essex at the beginning of the sentence Nuclear wastes are from!!..	
1062191, Nuclear Decommissioning Authority and Magnox Limited, 351	Yes	The NDA and Magnox Limited would like to confirm their support for the following modifications, which are consistent with the representations made by GVA (on behalf of the NDA and Magnox Limited) to the consultation on the Pre-Submission Draft of the RWLP: Main Modification 10 the modification to Policy 7. Minor Modification 27 the modification to paragraph 4.11. Minor Modification 35 the modification to paragraph 6.6. Minor modification 40 the modification to paragraph 8.32. While the NDA and Magnox welcome the abovementioned modifications to the RWLP, they maintain their view that further minor modifications are still required for the Plan to be considered sound.	

### Modification M28 – Paragraph 4.12

Person ID, Organisation, Comment ID	Do you agree with proposed modification M28?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
1062913, Anglian Water, 445	Yes	Anglian Water are in support of MIN 28.	

### Modification M29 – Paragraph 4.16

No Comments Received

### Modification M30 – Paragraph 4.24

Person ID, Organisation, Comment ID	Do you agree with proposed modification M30?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
1062191, Nuclear Decommissioning Authority and Magnox Limited, 354	No	With respect to Minor Modification 30, it is noted that the WPA has proposed an amendment to the opening sentence of paragraph 4.24 and this is consistent with the wording proposed by the NDA and Magnox Limited. It is further noted that the RWLP makes reference to the national process to identify a site for a GDF facility in Chapter 8. However, this process is an important part of the context to national nuclear waste management and, as such, also needs to be referenced in the introductory text in Chapter 4 for the purposed of consistency and clarity. Thus, the NDA and Magnox Limited maintain their view that paragraph 4.24 should also refer to the national process to identify a site for a GDF and confirm that any proposed GDF facility would be approved as a Nationally Significant Infrastructure Project (NSIP) under the Planning Act 2008. It is noted that paragraph 4.24 also states that: "Locational criteria policies provide the means by which future nuclear and non-nuclear waste proposals will be assessed should the market identify a need for further facilities in the Plan area." It is	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M30?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>assumed that, in terms of nuclear radioactive waste, the primary relevant locational criteria policy is Policy 7, at least for Bradwell sites own radioactive waste. It is considered that paragraph 4.24 should cross-reference the relevant locational criteria policies for consistency and clarity, as well as ease of understanding. Furthermore, it is considered that a new sentence should also be added following paragraph 4.24 to clarify the role of NDA Strategy in the waste planning arena. The NDA and Magnox request that the following wording is added: "The national strategy for the management of radioactive waste is prepared and issued by the NDA. The Energy Act 2004 requires that the NDA Strategy is reviewed and republished at least every five years. UK Government and the Scottish Ministers approved the current Strategy, "NDA Strategy III" in March 2016 and it came into effect in April 2016. The Local Plan seeks to be consistent with prevailing NDA Strategy and recognises its status as a national policy in the arena of radioactive waste management."</p>	

### Modification M31 - Paragraph 4.25

Person ID, Organisation, Comment ID	Do you agree with proposed modification M31?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
735401, Basildon Borough Council, 143	Yes	The Council supports this modification as a factual update.	

## Modification M32 – Paragraph 4.26

No Comments Received

## Modification M33 – Paragraph 5.2

Person ID, Organisation, Comment ID	Do you agree with proposed modification M33?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
1053830, 16	No	<p>The change in wording puts the emphasis on commercial viability over practical self-sufficiency. For instance the wording of this paragraph would allow the import of 595,000 tonnes of commercial waste to the Rivenhall incinerator from outside the administrative area, which would make the Rivenhall facility commercially viable, but would not make the county self-sufficient with the handling of its own waste. With no clear definite in of what is considered a small amount of waste of what volumes or ratios we are willing to accept in comparison to what we generate ourselves. This wording lends itself to the administrative area becoming a net importer of waste from outside the administrative area and therefore a dumping ground for the rest of the nation or even further afield and little to encourage self-sufficiency.</p>	<p>The Plan is based on the principle of net self-sufficiency, where practicable. This means having sufficient waste transfer, recycling, recovery, and disposal capacity within the Plan area to manage the amount of waste generated, with only limited cross border movements with other authorities. Such an approach recognises that waste travels across administrative boundaries, particularly when the source of the waste is located close to an administrative border with the distance travelled being, at least in part, related to the volume of waste required to make a facility economically viable set against the amount of waste expected to arise in a given area. The smaller the quantity of a waste type generated, the less practical it is to be net self-sufficient due to economies of scale making small, purely local facilities unviable. Particularly specialist types of waste travel beyond one or more administrative boundaries. Emphasis, should however be on self-sufficiency and all facilities should be designed and administered to serve the administrative area first and foremost, with the avoidance of the administrative area becoming a net importer of waste due to the tender process, which could mean the administrative area has to export its own waste while other administrative areas win tenders to export their waste to Essex.</p>

Person ID, Organisation, Comment ID	Do you agree with proposed modification M33?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
985256, , 301	No	<p>The modification sacrifices the principle of net self-sufficiency to make 'a facility economically viable' through 'economies of scale'. The modification is made for the benefit of the Rivenhall facility, a facility that is not built, not licensed, already benefitting from subsidy in the form of a Contract for Difference and enjoying a monopoly under the terms of the plan. The 'economies of scale' at Rivenhall will mean an increase in the importation of waste from outside the plan area, an increase in the number of journeys and the distances travelled by lorries transporting waste, resulting in an increase in pollution, an increase in congestion and a further disincentive to recycle and reduce waste. The modification justifies and makes way for a course of action that undermines the 'circular economy', is out of line with the 'waste hierarchy', renders the 'proximity principle' meaningless and makes a mockery of the concept of 'sustainable development'. In short the modification makes it possible for the reality delivered by the Plan to be completely at odds with the Vision it sets out, rendering the plan not deliverable, not justified, not effective and not consistent with national policy.</p>	<p>The modification should be removed and the final sentence modified to reinforce the principle of self-sufficiency by making clear that all facilities should serve the plan area first and foremost.</p>

### Modification M34 – Paragraph 6.6

No Comments Received

### Modification M35 – Paragraph 7.1

Person ID, Organisation, Comment ID	Do you agree with proposed modification M35?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
1057927, Hayleys Padfield Ltd, 65	No	<p>In our view the amended statement “Although it is recognised that capacity gaps remain in all the waste streams other than for biological treatment, it is considered that all suitable sites submitted to the Waste Planning Authorities have been allocated” is incorrect. The inspector recommended a number of modifications which were deemed necessary to make the plan sound/legally compliant and appropriate for adoption. One such recommendation was that discounting a site purely on the grounds that it is situated in the Green Belt renders the plan unsound. The inspectors recommendations in relation to Dollymans Farm and its subsequent allocation in our view, is a clear steer that other sites discounted purely because of their location in the Green Belt should also be reconsidered. As set out within paragraph 6 of the NPPW, local authorities should work collaboratively with local planning authorities and first look for suitable sites and areas outside the Green Belt for waste management facilities that, if located in the Green Belt, would be inappropriate development. There is now an identified need for 7.05mt of inert waste capacity over the plan period and Essex County Council has not identified enough sites for inert waste disposal to meet the calculated demand over the plan period, with an increased shortfall of 4.47mt. Therefore in accordance with paragraph 6 of the NPPW and paragraph 83 of the NPPF, sites within the Green Belt should be considered to meet the shortfall in need. The methodology of Site Assessment and Selection Report states that Stage 2 introduces a sequential approach whereby sites that are in the green belt or score red for traffic and transportation are held back (unless there</p>	<p>In order to ensure that paragraph 7.1 is correct and the Plan is sound/legally compliant, Green Belt sites need to be reassessed for allocation.</p>

Person ID, Organisation, Comment ID	Do you agree with proposed modification M35?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>are exceptional circumstances). Rather than being excluded completely such as at Stage 1, sites in the green belt or that do not comply with transport policy would only be considered for allocation if, after the rest of the assessment had been carried out through Stage 3, insufficient sites that passed Stage 2 were suitable for meeting the capacity gap associated with a particular waste stream.. Despite this statement which is in line with the NPPF and NPPW guidance set out above, the increase in shortfall and the inspectors observations, Essex County Council continues to take a blanket approach to rejecting all landfill/inert waste disposal sites within the Green Belt, regardless of other sustainability factors, with only Dollymans Farm being allocated in response to concerns raised by the inspector in relation to that specific site. Furthermore the blanket approach has resulted in a lack of waste facilities and in particular inert waste recycling facilities in the south of the County. As a result the plan is not in accordance with the three dimensions of sustainable development, namely economic, social and environmental. In particular it will result in long journeys within and out of the County to dispose of waste. Especially given that it is the southern part of the county which is the most populated. As a result there is a strong and over reliance on inert waste sites in the North of Essex and a long distance in sustainability terms from Harlow, which does not accord with the Spatial Strategy. The Spatial Strategy specifically sets out that new waste developments should principally be directed to key urban centres including Harlow. An example of a site which should be allocated to ensure that the statement is correct and the Plan sound/legally compliant is Hastingwood, Harlow (W19). This 1.35 hectare Green Belt site was submitted by the landowner for consideration for either inert or non-inert</p>	



Person ID, Organisation, Comment ID	Do you agree with proposed modification M35?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>waste recycling. The extent of the site proposed resulted from discussions with Essex County Council and is currently made up of 0.96 hectares of previously developed land and 0.39 hectares of agricultural land. At the time of submission the majority of the site had been used for many years for the storing, sorting and recycling of aggregates, albeit without the benefit of planning permission. Since that time the landowner has successfully acquired a Certificate of Lawful Use for the site to be used for the storage, screening and distribution of recycled of road plantings (and use of associated plant and equipment) (LPA Ref: ESS/39/EPF). The majority of the site can therefore now be described as previously developed land which in our view is now a material consideration in favour of its allocation. The site was discounted on the grounds that it was situated in the Green Belt. However, it scored very well in the sustainability appraisal with benefits of allocating the site including its location is a very sustainable location in close proximity to Harlow which is an area of the County that does not have any inert waste disposal facilities; t location next to Junction 7 of the M11, a major transport corridor; the significant distance of the site from residential properties; and the low quality nature of the Green belt land particularly given that over 2/3 of it is previously developed land.</p>	
1062191, Nuclear Decommissioning Authority and Magnox Limited, 352	Yes	<p>The NDA and Magnox Limited would like to confirm their support for the following modifications, which are consistent with the representations made by GVA (on behalf of the NDA and Magnox Limited) to the consultation on the Pre-Submission Draft of the RWLP: Main Modification 10 the modification to Policy 7. Minor Modification 27 the modification to paragraph 4.11. Minor Modification 35 the modification to paragraph 6.6. Minor modification 40 the modification to paragraph 8.32. While the NDA and</p>	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M35?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		Magnox welcome the abovementioned modifications to the RWLP, they maintain their view that further minor modifications are still required for the Plan to be considered sound.	

### Modification M36 – Paragraph 7.2

Person ID, Organisation, Comment ID	Do you agree with proposed modification M36?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
985065, 42	No	This retains the previously used vague description. The plan should be amended to describe this material correctly as srf/rdf.	
1059617, 55	No	I object to 7.2 as it still refers to "other waste management" at strategic sites (i.e. Rivenhall) This is very vague.	This should be amended to correctly describe this material as SRF/RDF
1060507, Coggeshall Neighbourhood Plan Committee, 84	No	This retains the previously used vague description. The plan should be amended to describe this material correctly as srf/rdf.	
477311, 93	No	This retains the previously used vague description. The plan should be amended to describe this material correctly as srf/rdf.	
1061659, 180	No	What exactly does this mean - it's a vague description. The plan should be amended to describe this material correctly as srf/rdf.	
1061682, 197	No	This retains the same previously used and vague description. The plan should be changed to correctly describe the material/waste as SRF/RDF.	
1059617, 227	No	Para 7.2 still refers to other waste management at strategic sites (i.e. Rivenhall Airfield). This retains a very vague description and should be amended to describe the material correctly as SRF/RDF.	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M36?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
988283, Bradwell with Pattiswick Parish Council, 234	No	This retains the previously used vague description. The plan should be amended to describe this material correctly as SRF/RDF.	
1062089, Coggeshall Parish Council, 326	No	This retains the previously used vague description; -The plan should be amended to describe this material correctly as srf/rdf.	
743809, 457	No	For some reason, this still retains the previously used vague description. Clarification needed i.e. the plan should be amended to describe this material correctly as srf/rdf.	
1063344, 472	No	This retains the previously used vague description. The plan should be amended to describe this material correctly as srf/rdf.	
618724, 511	No	This retains the previously used vague description. The plan should be amended to describe this material correctly as srf/rdf.	
911132, Cressing Parish Council, 521	No	Other waste management is a vague description. The plan should be amended to describe this material correctly as SRF/RDF.	

### Modification M37 – Paragraph 8.7

No Comments Received

### Modification M38 – Paragraph 8.15

No Comments Received

### Modification M39 – Paragraph 8.23 and 8.26

Person ID, Organisation, Comment ID	Do you agree with proposed modification M39?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
1062191, Nuclear Decommissioning Authority and Magnox Limited, 356	No	<p>With respect to Minor Modification 39, it is noted that the proposed amendments to paragraphs 8.23 and 8.26 are consistent with the wording proposed by the NDA and Magnox Limited. However, it is considered that paragraph 8.23 should be amended to make reference to the latest versions of the national strategies (which governs the management of radioactive waste) in order to reflect the current national planning policy position. As highlighted in the NDA and Magnox Limited's previous representations, the relevant strategy is the UK Strategy for the Management of Solid Low Level Waste from the Nuclear Industry , which was published in February 2016, as well as Nuclear Decommissioning Authority Strategy Effective from April 2016 ("NDA Strategy III" ) , which was published in March 2016 (effective from April 2016). This paragraph should also recognise that the national strategies referred to are under continual review. As a process, decommissioning may include the development of new buildings and other required facilities and potentially the in-situ management of waste (both radioactive and non-radioactive), and the NDA and Magnox would like to ensure that the Waste Local Plan recognises and supports the works that may be required in connection with the decommissioning and remediation process. In terms of waste management, the NDA and Magnox would like to draw the Councils attention to the emerging policy 1 and regulatory guidance concerning site remediation and site end state (condition after final site clearance). The Environmental Regulators draft guidance 2 will require Magnox (and other Nuclear Site Licence holders) to review the site-wide waste management approach to identify and deliver an optimised site end state. This includes</p>	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M39?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>consideration of site end states which may involve options for the in-situ disposal of existing sub-surface structures and the on-site disposal of any associated above ground portion, together with the approach to managing land contamination. End state options which may include in-situ disposal, together with any associated on-site disposal of the above portion, are being considered at Bradwell as one of the first NDA-owned sites to enter Care &amp; Maintenance Phase under an accelerated decommissioning programme. This waste management approach would be in line with the national strategy for managing radioactive waste and thus be in accordance with clause (a) of RWLP Policy 7. For consistency and clarity, the NDA and Magnox suggest that paragraph 8.23 is reworded in order to take the above considerations into account. It is suggested that paragraph 8.23 be reworded as follows: "The Bradwell-on-Sea site is one of the first UK nuclear Magnox reactor sites to be decommissioned. Within the period covered by this policy document, the site will enter into a period of quiescence, termed care and maintenance. Prior to this, ILW will be packaged and placed within the dedicated on-site storage facility. The packaged ILW will remain in the store until a national Geological Disposal Facility (GDF) is available. This process is in accordance with DECCs UKs waste management strategy for LLW &amp; ILW (dated 2010) national strategy for the management of radioactive waste (the current strategy was published in 2016 and is subject to regular review). . Following the period of care and maintenance, the site will be decommissioned and remediation activities undertaken (which may include in-situ disposal) which when completed will allow the site to reach end state. "</p>	

### Modification M40 – Paragraph 8.32

Person ID, Organisation, Comment ID	Do you agree with proposed modification M40?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
1062191, Nuclear Decommissioning Authority and Magnox Limited, 353	Yes	The NDA and Magnox Limited would like to confirm their support for the following modifications, which are consistent with the representations made by GVA (on behalf of the NDA and Magnox Limited) to the consultation on the Pre-Submission Draft of the RWLP: Main Modification 10 the modification to Policy 7. Minor Modification 27 the modification to paragraph 4.11. Minor Modification 35 the modification to paragraph 6.6. Minor modification 40 the modification to paragraph 8.32. While the NDA and Magnox welcome the abovementioned modifications to the RWLP, they maintain their view that further minor modifications are still required for the Plan to be considered sound.	

### Modification M41 – Paragraph 9.21

No Comments Received

### Modification M42 – Paragraph 9.23

Person ID, Organisation, Comment ID	Do you agree with proposed modification M42?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
1062089, Coggeshall Parish Council, 328	No	Material changes are defined in this section and as such the redesign of the IWMPF represents a material change and needs to be considered as such and not minor changes	

### Modification M43 – Paragraph 9.44

No Comments Received

### Modification M44 – Table 6 Monitoring Framework

No Comments Received

### Modification M45 – Basildon Waste Recycling Centre

No Comments Received

### Modification M46 - Rivenhall

Person ID, Organisation, Comment ID	Do you agree with proposed modification M46?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
1053830, 2	No	Site has been refused Environmental Licence by the Environmental Agency, therefore should be excluded from the document.	Table 16 Rivenhall should be excluded from the document.
1053830, 12	No	ECC have removed geographical restrictions in import of waste to the site. Therefore this site may potentially not process any waste from Essex as this will be dependent on legal fair tender, by which non-county providers may outbid Essex providers for waste management.	Table 16 Rivenhall and any mention of Rivenhall site should be removed from the Waste Plan.
985065, 43	No	This is not clear! The term 'other waste' is totally vague - it should be made clear that this material is the 200,000 tonnes per annum (TPA) SRF/RDF - because you know that this is the output from the operational Basildon plant - that would have to be brought in by lorry to the proposed (but not built) Rivenhall site. Is this legally compliant? Essex County Council is proposing that an unbuilt (and not yet fully approved) private site at Rivenhall, take output from the Basildon plant. This output is known to be (TPA) SRF/RDF which Essex County Council legally owns, as stated in the operational contract for the Basildon plant. Therefore, ECC appears to be disregarding the planning process that the Rivenhall site is engaged in, and jumping ahead to name the Rivenhall site as the one that will receive Basildon's output. The plan should be amended to ensure that there is no single allocation made for this specific material. It is waste material that should by law be subject to an OPEN PROCUREMENT PROCESS. ECC has stated that it delayed its final procurement process for SRG/RED from Basildon ahead of that procurement process, knowing that only Rivenhall in the plan area could be used in	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M46?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		the stated time horizon. However, even that assumption should now be questioned, given that the Environment Agency has refused the permit application for the Rivenhall site (in December 2019) because of their failure to demonstrate Best Available Technology (BAT). ECC is therefore attempting to allocate a plant that HAS NOT BEEN BUILT, IS STILL GOING THROUGH PLANNING, AND HAS NO LICENCE for a potential contract to take waste material that it owns.	
1059617, 57	No	I oppose this modification as it doesn't clearly identify the non-hazardous residual waste as SRF/RDF the known specific output from the Basildon pant. It is also questionable if it is legally complaint for ECC to allocate waste they own to a specific plant without procurement and when allocating this to a non-built or facility which has questionable planning permission and no environmental permit.	Clearly state the 200,000 tpa SRF/RDF and do the correct process of allocating material and to plants which can actually function which is built, has permits and permissions to actually function.
1060507, Coggeshall Neighbourhood Plan Committee, 85	No	THE PLAN SHOULD CLARIFY THAT THIS MATERIAL IS 200,00 tonnes per annum (TPA) SRF/RDF. THIS IS KNOWN TO BE OUTPUT FROM THE OPERATION BASILDON SITE WHICH WILL BE SENT VIA ROAD TO THE PROPOSED SITE AT RIVENHALL. IT IS NOT OBVIOUS THAT THIS MODIFICATION IS LEGAL. ESSEX COUNTY COUNCIL PROPOSES TO ASSIGN THE PROPOSED, PRIVATE, RIVENHALL SITE TO TAKE OUTPUT FROM THE PLANT IN BASILDON. THIS OUTPUT IS KNOWN TO BE SRF/RDF AND OWNED BY ECC AS SET OUT IN THE OPERATIONAL CONTRACT FOR THE BASILDON PLANT. ECC IS THEREFORE CONFUSING PLANNING AND PROCUREMENT BY ALLOCATING MATERIAL IT LEGALLY OWNS TO A SPECIFIC SITE. ECC IS AWARE THAT THE APPLICANT FOR THE RIVENHALL SITE, GENT FAIRHEAD, HAS UNAMBIGUOUSLY STATED IN PLANNING DOCUMENTS SUBMITTED TO ECC THAT RIVENHALL IS THE SITE TO WHICH THE BASILDON SPECIFIC OUTPUT CAN BE SENT. NO SINGLE ALLOCATION SHOULD BE MADE FOR THIS SPECIFIC MATERIAL. THE PLAN SHOULD BE AMENDED TO REFLECT THIS. BY LAW THIS WASTE MATERIAL SHOULD BE SUBJECT TO AN OPEN PROCUREMENT PROCESS. ECC HAS SAID THAT ITS FINAL	



Person ID, Organisation, Comment ID	Do you agree with proposed modification M46?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>PROCUREMENT PROCESS FOR SRF/RDF FROM BASILDON HAS BEEN DELAYED FOR A FEW YEARS TO ALLOW FURTHER SITES TO BECOME AVAILABLE. HOWEVER, IT HAS NONETHELESS ALLOCATED RIVENHALL TO TAKE THE SRF/RDF FROM BASILDON IN ADVANCE OF THAT PROCUREMENT PROCESS IN THE KNOWLEDGE THAT ONLY RIVENHALL COULD BE USED IN THE STATED TIME SCALE IN THE AREA COVERED BY THIS PLAN. THIS ASSUMPTION SHOULD NOW BE QUESTIONED GIVEN THAT THE ENVIRONMENT AGENCY REFUSED THE PERMIT APPLICATION FOR THE RIVENHALL SITE IN DECEMBER 2016 DUE TO THE FAILURE TO DEMONSTRATE BAT. ECC IS THEREFORE ATTEMPTING TO ALLOCATE AN UNBUILT PLANT WHICH IS STILL GOING THROUGH THE PLANNING PROCESS TO TAKE OUTPUT FROM THE BASILDON PLANT. IN ADDITION ECC HAS NO LICENCE FOR A POTENTIAL CONTRACT TO TAKE WASTE MATERIAL IT OWNS. ECC STATES THAT RIVENHALL SHOULD BE ALLOCATED FOR RESIDUAL NON-HAZARDOUS WASTE MANAGEMENT. MAP 5 DOES NOT ALLOCATE THE RIVEN HALL SITE FOR THIS USE.</p>	
477311, 94	No	<p>IT DOES NOT PROVIDE CLARITY. THE PLAN SHOULD MAKE IT CLEAR THAT THIS MATERIAL (ORIGINALLY CALLED OTHER WASTE ) IS 200,000 tonnes per annum (TPA) SRF/RDF BECAUSE THE ALLOCATION IS A SPECIFICALLY KNOWN OUTPUT FROM THE OPERATIONAL BASILDON PLANT TO BE TRUCKED TO THE PROPOSED (BUT NOT BUILT) RIVENHALL SITE. IT IS NOT CLEAR THAT THIS IS LEGALLY COMPLIANT. ECC IS PROPOSING TO ALLOCATE THE PROPOSED (BUT NOT BUILT) PRIVATE SITE AT RIVENHALL TO TAKE THE KNOWN SRF/RDF OUTPUT FROM THE BASILDON PLANT. THIS OUTPUT IS LEGALLY OWNED BY ECC AS STATED IN THE OPERATIONAL CONTRACT FOR THE BASILDON PLANT. THEREFORE ECC APPEARS TO BE CONFUSING PLANNING AND PROCUREMENT BY ALLOCATING MATERIAL IT LEGALLY OWNS TO A SPECIFIC SITE. ECC IS AWARE THAT GENT FAIRHEAD, THE APPLICANT FOR THE RIVENHALL SITE HAS SPECIFICALLY STATED</p>	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M46?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>IN PLANNING DOCUMENTS SUBMITTED TO ECC THAT RIVENHALL IS THE SITE TO WHICH THE BASILDON SPECIFIC OUTPUT CAN BE SENT. THE PLAN SHOULD BE AMENDED TO ENSURE THAT THERE IS NO SINGLE ALLOCATION MADE FOR THIS SPECIFIC MATERIAL OWNED BY ECC. IT IS WASTEMATERIAL THAT SHOULD BY LAW BE SUBJECT TO AN OPEN PROCUREMENT PROCESS. ESSEX COUNTY COUNCIL HAS STATED THAT IT DELAYED ITS FINAL PROCUREMENT PROCESS FOR SRF/RDF FROM BASILDON FOR A FEW YEARS TO ALLOW FURTHER SITES TO COME ON-STREAM BUT HAS NEVERTHELESS ALLOCATED RIVENHALL TO TAKE THE SRF/RDF FROM BASILDON AHEAD OF THAT PROCUREMENT PROCESS KNOWING THAT ONLY RIVENHALL IN THE PLAN AREA COULD BE USED IN THE STATED TIME HORIZON. HOWEVER EVEN THAT ASSUMPTION SHOULD NOW BE QUESTIONED GIVEN THAT THE ENVIRONMENT AGENCY REFUSED THE PERMIT APPLICATION FOR THE RIVENHALL SITE IN DECEMBER 2016 BECAUSE OF THE FAILURE TO DEMONSTRATE BAT (Best Available Technology). ECC IS THEREFORE ATTEMPTING TO ALLOCATE A PLANT THAT HAS NOT BEEN BUILT (AND IS STILL GOING THROUGH PLANNING) AND HAS NO LICENCE, FOR A POTENTIAL CONTRACT TO TAKE WASTE MATERIAL IT OWNS. IN ADDITION, MAP 5 FAILS TO ALLOCATE RIVENHALL FOR RESIDUAL NON-HAZARDOUS WASTE MANAGEMENT (PREVIOUSLY "OTHER WASTE") AS ECC STATES IT WISHES TO DO.</p>	
1061659, 181	No	<p>IT DOES NOT CLEAR DETAIL THE PLAN SHOULD MAKE IT PLAIN AND CLEAR THAT THIS MATERIAL IS 200,000 tonnes per annum (TPA) SRF/RDF BECAUSE THE ALLOCATION IS SPECIFICALLY KNOWN OUTPUT FROM THE OPERATIONAL BASILDON PLANT TO BE TRUCKED TO THE PROPOSED (BUT NOT BUILT) RIVENHALL SITE. IT IS QUESTIONABLE WHETHER THIS IS LEGALLY COMPLIANT. ECC IS PROPOSING TO ALLOCATE THE PROPOSED (BUT NOT BUILT) PRIVATE SITE AT RIVENHALL TO TAKE OUTPUT FROM THE BASILDON PLANT. THIS OUTPUT IS KNOWN TO BE</p>	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M46?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>SRF/RDF WHICH ECC LEGALLY OWNS AS STATED IN THE OPERATIONAL CONTRACT FOR THE BASILDON PLANT. THEREFORE ECC APPEARS TO BE CONFUSING PLANNING AND PROCUREMENT BY ALLOCATING MATERIAL IT LEGALLY OWNS TO A SPECIFIC SITE. ECC IS AWARE THAT GENT FAIRHEAD, THE APPLICANT FOR THE RIVENHALL SITE HAS SPECIFICALLY STATED IN PLANNING DOCUMENTS SUBMITTED TO ECC THAT RIVENHALL IS THE SITE TO WHICH THE BASILDON SPECIFIC OUTPUT CAN BE SENT. THE PLAN SHOULD BE AMENDED TO ENSURE THAT THERE IS NO SINGLE ALLOCATION MADE FOR THIS SPECIFIC MATERIAL. IT IS WASTE MATERIAL THAT SHOULD BY LAW BE SUBJECT TO AN OPEN PROCUREMENT PROCESS. ESSEX COUNTY COUNCIL HAS STATED THAT IT DELAYED ITS FINAL PROCUREMENT PROCESS FOR SRF/RDF FROM BASILDON FOR A FEW YEARS TO ALLOW FURTHER SITES TO COME ON-STREAM BUT HAS NEVERTHELESS ALLOCATED RIVENHALL TO TAKE THE SRF/RDF FROM BASILDON AHEAD OF THAT PROCUREMENT PROCESS KNOWING THAT ONLY RIVENHALL IN THE PLAN AREA COULD BE USED IN THE STATED TIME HORIZON. HOWEVER EVEN THAT ASSUMPTION SHOULD NOW BE QUESTIONED GIVEN THAT THE ENVIRONMENT AGENCY REFUSED THE PERMIT APPLICATION FOR THE RIVENHALL SITE IN DECEMBER 2016 BECAUSE OF THE FAILURE TO DEMONSTRATE BAT. ECC IS THEREFORE ATTEMPTING TO ALLOCATE A PLANT THAT HAS NOT BEEN BUILT (AND IS STILL GOING THROUGH PLANNING) AND HAS NO LICENCE FOR A POTENTIAL CONTRACT TO TAKE WASTE MATERIAL IT OWNS. IN ADDITION, MAP 5 FAILS TO ALLOCATE RIVENHALL FOR RESIDUAL NON-HAZARDOUS WASTE MANAGEMENT AS ECC STATES IT WISHES TO DO.</p>	
1061682, 198	No	<p>This does not clearly define what exactly " other waste" actually is. It should be made clear that the 200,000 tonnes of waste per year will be SRF/RDF as this has been allocated from the Basildon plant to be driven down to the Rivenhall site. This site has and may not still be built</p>	

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		<p>and is adds additional pollution. It is still unclear if this is even legally allowed. Essex County Council are proposing to allocate the Rivenhall site which as stated above has not even been built or received a permit, to take the SRF/RDF waste from Basildon which coincidentally is owned by ECC as was stated in the operational contract for the plant. It would therefore appears that ECC are allocating their own waste to a specific site. ECC are also aware that the applicant for the site at Rivenhall, Gent Fairhead has stated in their planning documentation that the site at Rivenhall will take the output from the Basildon site. This is not only confusing the planning and procurement by doing this, it is also a conflict of interests I feel. This should therefore be amended so that the waste material should go through an open procurement process and not all be pushed towards an already environmentally unsound plant. Just to boost their figures. ECC had delayed the procurement process for SRF/RDF from Basildon to allow further sites to come forward, yet have still allocated Rivenhall to take all the waste knowing that this site would be the only one able to take the waste in the time frame. In view of the recent environmental agency permit refusal and the sites failure to demonstrate BAT, their assumption should be questioned as the plant has not been built and has not licence in which to enable a contract between the companies to take the waste.</p>	
988283, Bradwell with Pattiswick Parish Council, 235	No	<p>It does not provide clarity. The plan should make it clear that this material (originally called other waste) is 200,000 tonnes per annum (tpa) SRF/RDF because the allocation is a specifically known output from the operational Basildon plant to be trucked to the proposed (but not built) Rivenhall site. It is unclear whether this is legally compliant. ECC is proposing to allocate the proposed (but not built) private site at Rivenhall to take the known SRF/RDF output from the Basildon plant. This output is legally owned by ECC as stated in the operational contract for the Basildon plant, therefore ECC appears to be confusing planning and procurement by allocating material it legally owns to a specific site. ECC is aware that Gent Fairhead, the applicant for the Rivenhall site, has specifically stated in planning documents submitted to ECC that Rivenhall is the site to which the Basildon specific output</p>	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M46?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>can be sent. The plan should be amended to ensure that there is no single allocation made for this specific material owned by ECC. It is waste material that should by law be subject to an open procurement process. Essex County Council has stated that it delayed its final procurement process for SRF/RDF from Basildon for a few years to allow further sites to come on-stream, but has nevertheless has allocated Rivenhall to take the SRF/RDF from Basildon ahead of that procurement process knowing that only Rivenhall in the plan area could be used in the stated time horizon. That assumption should now be questioned given that the Environment Agency refused the permit application for the Rivenhall site in December 2016 because of the failure to demonstrate bat (best available technology). ECC is therefore attempting to allocate a plant that has not been built (and is still going through planning) and has no licence, for a potential contract to take waste material it owns. In addition, map 5 fails to allocate Rivenhall for residual non-hazardous waste management (previously "other waste") as ECC states it wishes to do.</p>	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M46?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
1062089, Coggeshall Parish Council, 327	No	<p>This modification does not provide the intended clarity. We believe the plan should make it clear that this material is 200,000 tonnes per annum (tpa) srf/rdf because the allocation is specifically known output from the operational Basildon plant to be trucked to the proposed (but not built) Rivenhall site. One of the key aspects of the review is to ensure legal compliance and we do not believe that is legally compliant. It appears that ECC is proposing to allocate the proposed (but not built) private site at Rivenhall to take output from the Basildon plant. this output is known to be srf/rdf which ECC legally owns as stated in the operational contract for the Basildon plant. ECC appears to be allocating material it legally owns to a specific private facility without any adherence to their procurement processes and procedures or those associated with the provision of government contracts. This could, clearly, be interpreted as meaning that agreement has been reached between ECC and Gent Fairhead without either the proper planning or procurement procedures being followed. This would be ultra vires the Councils powers and shows a level of pre-determination. ECC is aware that Gent Fairhead, the applicant for the Rivenhall site, has specifically stated in their planning documents submitted to ECC that Rivenhall is the site to which the Basildon specific output can be sent. We believe the plan should be amended to ensure that there is no single allocation made for this specific material. It is waste material that should by law be subject to an open procurement process. Essex County Council has stated that it delayed its final procurement process for srf/rdf from Basildon for a few years to allow further sites to come on-stream but has nevertheless allocated Rivenhall to take the srf/rdf from Basildon ahead of that procurement process in the knowledge that only Rivenhall in the plan area and could be used in the stated time horizon. In addition, the inclusion of Rivenhall should now be questioned given that the Environment Agency refused the permit application for the Rivenhall site in December 2016. The refusal was because of the applicants failure to utilise the Best Available Technology (BAT), air quality emissions with predicted emissions more than twice the legal limits and the stack height that is too low for a plant of this size (changes will contravene the</p>	

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		<p>Secretary of State planning conditions 2010 ). Consequently, we believe that ECC is clearly attempting to allocate waste material it owns (SRF Form Basildon) to a plant that has not been built, has no operating licence, will require significant redesign, gas dispersion remodelling, an environmental impact assessment and must go through the planning process again before it is even possible to consider processing waste and this does not appear sensible, never mind legal. Consequently, we require an explanation as to why ECC is allocating a plant (Rivenhall) that has not been built (and is still going through planning) and has no licence for a potential contract to take waste material it (ECC) owns? In addition, the applicants own response to the EA (Fitchner Report in response to second schedule 5 questions from the EA section 2) clearly stated that if the EA permit was refused the plant would not go ahead and given the above allocating waste to the plant is at best irresponsible. Furthermore, and importantly the plan does not consider any alternatives should the Rivenhall plant may not survive the next round of planning or the next EA permit application and as such the plan must be revisited in light of the accreditation problems the Rivenhall plant faces. We also believe that, MAP 5 is incorrect inasmuch as it fails to allocate Rivenhall for "residual non-hazardous waste management" as ECC states it wishes to do.</p>	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M46?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
743809, 458	No	<p>THIS DOES NOT PROVIDE CLARITY. THE PLAN SHOULD MAKE IT CLEAR THAT THIS MATERIAL IS 200,000 tonnes per annum (TPA) SRF/RDF BECAUSE THE ALLOCATION IS THE SPECIFICALLY KNOWN OUTPUT FROM THE OPERATIONAL BASILDON PLANT - TO BE TRUCKED TO THE PROPOSED (BUT NOT YET BUILT) RIVENHALL SITE. IT IS NOT CLEAR WHETHER THIS IS LEGALLY COMPLIANT. ECC WANTS TO ALLOCATE THE PROPOSED (BUT NOT BUILT) PRIVATE SITE AT RIVENHALL TO TAKE OUTPUT FROM THE ECCBASILDON PLANT. THIS OUTPUT IS KNOWN TO BE SRF/RDF WHICH ECC LEGALLY OWNS (AS STATED IN THE OPERATIONAL CONTRACT FOR THE BASILDON PLANT). THEREFORE ECC APPEARS TO BE CONFUSING PLANNING AND PROCUREMENT BY ALLOCATING MATERIAL IT LEGALLY OWNS TO A SPECIFIC PRIVATELY OWNEDSITE. ECC IS AWARE THAT GENT FAIRHEAD, ( APPLICANT FOR THE RIVENHALL SITE) HAS SPECIFICALLY STATED IN ITS PLANNING DOCUMENTS SUBMITTED TO ECC THAT RIVENHALL IS THE SITE TO WHICH THE BASILDON SPECIFIC OUTPUT CAN BE SENT. AMEND THE PLAN : ENSURE THAT THERE IS NO SINGLE ALLOCATION MADE FOR THIS SPECIFIC MATERIAL. SUCH MATERIAL SHOULD BY LAW BE SUBJECT TO AN OPEN PROCUREMENT PROCESS BY ECC . ECC HAS STATED THAT IT DELAYED ITS FINAL PROCUREMENT PROCESS FOR SRF/RDF FROM BASILDON FOR A FEW YEARS TO ALLOW FURTHER SITES TO COME ON-STREAM BUT ECC HAS NEVERTHELESS ALLOCATED RIVENHALL TO TAKE THE SRF/RDF FROM BASILDON AHEAD OF THAT PROCUREMENT PROCESS KNOWING THAT ONLY RIVENHALL IN THE PLAN AREA COULD BE USED IN THE STATED TIME HORIZON. EVEN THAT ASSUMPTION SHOULD NOW BE QUESTIONED PLEASE. NOTE 1: THE ENVIRONMENT AGENCY REFUSED THE PERMIT APPLICATION FOR THE RIVENHALL SITE (DECEMBER 2016) BECAUSE OF THE FAILURE TO DEMONSTRATE BAT. NOTE 2: AS THE SITE DOES NOT HAVE FULL PLANNING CONSENTS NOR A LICENCE TO OPERATE AND THOUGH NOT TO BE DIRECTLY</p>	



Person ID, Organisation, Comment ID	Do you agree with proposed modification M46?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>CONSIDERED HERE, I WOULD CALL THE INSPECTORS ATTENTION TO THE PLANNED SHORT STACK. YET WOULD NOT CURRENT TECHNICAL KNOWLEDGE HAVE DICTATED LONG AGO THAT A MUCH HIGHER STACK WOULD BE NECESSARY FOR SUCH AN UNDERTAKING ? THIS IS ALSO FURTHER COMPOUNDED BY THE WATER PROCESSING CYCLE SITUATION. ON THE PART OF ECC, IT WOULD APPEAR THAT IT IS THEREFORE ATTEMPTING TO ALLOCATE A PRIVATE PLANT (AT RIVENHALL) THAT HAS NOT YET BEEN BUILT ( AND IS STILL GOING THROUGH PLANNING ). IMPORTANTLY, ECCHAS NO LICENCE FOR A POTENTIAL CONTRACT TO TAKE WASTE MATERIAL IT OWNS. MAP 5 FAILS TO ALLOCATE RIVENHALL FOR "RESIDUAL NON-HAZARDOUS WASTE MANAGEMENT" AS ECC STATES IT WISHES TO DO.</p>	
1063344, 473	No	<p>THIS DOES NOT SEEM TO BE LEGALLY COMPLIANT AS ECC IS PLANNING TO ALLOCATE MATERIAL FROM THE BASILDON PLANT, WHICH IT OWNS TO THE PROPOSED RIVENHALL FACILITY WHEREAS THE ALLOCATION OF MATERIAL OWNED BY ECC SHOULD BE SUBJECT TO AN OPEN PROCUREMENT PROCESS. THE PLAN SHOULD BE AMENDED TO ENSURE THERE IS NO SINGLE ALLOCATION, FOR THIS SPECIFIC MATERIAL. ESSEX COUNTY COUNCIL STATED THAT IT POSTPONED ITS FINAL PROCUREMENT PROCESS FOR SRF/RDF FROM BASILDON FOR A SEVERAL YEARS SO THAT FURTHER SITES COULD COME INTO OPERATION YET HAS ALLOCATED RIVENHALL TO TAKE THE SRF/RDF FROM BASILDON AHEAD OF THAT PROCUREMENT PROCESS IN THE KNOWLEDGE THAT RIVENHALL WOULD BE THE ONLY SITE IN THE PLAN AREA AVAILABLE IN THE STATED TIME HORIZON. EVEN THAT ASSUMPTION SHOULD BE QUESTIONED SINCE THE ENVIRONMENT AGENCY REFUSED THE PERMIT APPLICATION FOR THE RIVENHALL SITE IN DECEMBER 2016 DUE TO THE FAILURE TO DEMONSTRATE BAT. ECC IS THUS TRYING TO ALLOCATE A PLANT THAT HAS NOT BEEN BUILT (AND IS STILL GOING THROUGH PLANNING) AND HAS NO LICENCE FOR A</p>	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M46?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		POTENTIAL CONTRACT TO TAKE WASTE MATERIAL IT OWNS. IN ADDITION, MAP 5 FAILS TO ALLOCATE RIVENHALL FOR RESIDUAL NON-HAZARDOUS WASTE MANAGEMENT AS ECC STATES IT WISHES TO DO.	
618724, 512	No	THIS DOES NOT PROVIDE CLARITY. THE PLAN SHOULD MAKE IT CLEAR THAT THIS MATERIAL IS 200,000 tonnes per annum (TPA) SRF/RDF. THE WASTE IS SPECIFICALLY A KNOWN OUTPUT FROM THE OPERATIONAL BASILDON PLANT ALLOCATED TO THE PROPOSED (BUT NOT BUILT) RIVENHALL SITE. THE PROPOSED TEXT IS AN IMPROVEMENT ON THE VAGUE OTHER WASTE PREVIOUSLY PROPOSED BUT STILL DOES NOT PROPERLY DEFINE THE MATERIAL. IT IS NOT CLEAR THAT THIS IS LEGALLY COMPLIANT. ECC IS PROPOSING TO ALLOCATE THE PROPOSED (BUT NOT BUILT) PRIVATE SITE AT RIVENHALL TO TAKE THE SRF/RDF OUTPUT FROM THE BASILDON PLANT. THIS OUTPUT IS WASTE MATERIAL WHICH ECC LEGALLY OWNS - AS STATED IN THE OPERATIONAL CONTRACT FOR THE BASILDON PLANT. THEREFORE ECC APPEARS TO BE CONFUSING PLANNING AND PROCUREMENT BY ALLOCATING MATERIAL IT LEGALLY OWNS TO A SPECIFIC PRIVATE SITE. ECC IS ALSO AWARE THAT GENT FAIRHEAD, THE APPLICANT FOR THE RIVENHALL SITE HAS SPECIFICALLY STATED IN PLANNING DOCUMENTS SUBMITTED TO ECC THAT RIVENHALL IS THE SITE TO WHICH THE BASILDON SPECIFIC OUTPUT CAN BE SENT. THE PLAN SHOULD BE AMENDED TO ENSURE THAT THERE IS NO SINGLE ALLOCATION MADE FOR THIS SPECIFIC MATERIAL. IT IS WASTE MATERIAL THAT SHOULD BY LAW BE SUBJECT TO AN OPEN PROCUREMENT PROCESS. ESSEX COUNTY COUNCIL HAS STATED THAT IT DELAYED ITS FINAL PROCUREMENT PROCESS FOR SRF/RDF FROM BASILDON FOR A FEW YEARS TO ALLOW FURTHER SITES TO COME ON-STREAM BUT HAS NEVERTHELESS ALLOCATED RIVENHALL TO TAKE THE SRF/RDF FROM BASILDON AHEAD OF THAT PROCUREMENT PROCESS	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M46?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>KNOWING THAT ONLY RIVENHALL IN THE PLAN AREA COULD BE USED IN THE STATED TIME HORIZON. HOWEVER EVEN THAT ASSUMPTION COULD NOW BE QUESTIONED GIVEN THAT THE ENVIRONMENT AGENCY REFUSED THE PERMIT APPLICATION FOR THE RIVENHALL SITE IN DECEMBER 2016 BECAUSE OF THE FAILURE TO DEMONSTRATE BAT. ECC IS THEREFORE ATTEMPTING TO ALLOCATE ITS OWN WASTE TO A PLANT THAT HAS NOT BEEN BUILT (AND IS STILL GOING THROUGH PLANNING) AND HAS NO LICENCE, AND HAS DELAYED ITS PROCUREMENT TENDER PROCESS IN ORDER IN PART IN THE HOPE THAT RIVENHALL WILL BE BUILT. HOW IS THAT LEGALLY COMPLIANT ? IN ADDITION, MAP 5 FAILS TO ALLOCATE RIVENHALL FOR RESIDUAL NON-HAZARDOUS WASTE MANAGEMENT AS ECC STATES IT WISHES TO DO.</p>	
911132, Cressing Parish Council, 522	No	<p>This does not provide clarity. The plan should be clear that this material is 200,000 tonnes per annum (TPA) SRF/RDF because the allocation is a specifically known output from the operational Basildon plant to be trucked to the proposed Rivenhall site. It is not clear that this is legally compliant. It is proposed to allocate the proposed private site at Rivenhall to take the known SRF/RDF output from the Basildon plant. This output is legally owned by ECC as stated in the operational contract for the Basildon plant. Therefore planning and procurement appears to be confused by allocating material ECC legally owns to a specific site. The applicant for the Rivenhall site has specifically stated in planning documents submitted to ECC that the Basildon output can be sent to the Rivenhall site. The plan should be amended to ensure that there is no single allocation made for this specific material owned by ECC. It is waste material that should by law be subject to an open procurement process. ECC has stated that it delayed its final procurement process for SRF/RDF from Basildon for a few years to allow further sites to come on-board but has nevertheless allocated Rivenhall to take the SRF/RDF from Basildon ahead of that procurement process knowing that only Rivenhall in the plan area could be used in the stated time horizon. However that assumption should</p>	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M46?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		now be questioned given that the Environment Agency refused the permit application for the Rivenhall site in December 2016 because of the failure to demonstrate BAT (best available technology). ECC is therefore attempting to allocate a plant that has not been built (and is still going through planning) and has no licence, for a potential contract to take waste material it owns. In addition, map 5 fails to allocate Rivenhall for residual non-hazardous waste management (previously "other waste") as ECC states it wishes to do.	

#### **Modification M47 – Little Bullocks and Crumps Farm, Great and Little Canfield and Newport Quarry**

No Comments Received

#### **Modification M48 – Festival Business Park, Basildon**

Person ID, Organisation, Comment ID	Do you agree with proposed modification M47?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
934262, C A Telecom, 23	Unrelated	We can confirm that COLT Utility Services are within one of the areas of your enquiry, Festival Business Park, Basildon. All other locations are not affected. See attachment - 'Map of Colt Utility Service area of Festival Business Park in Basildon'	
735401, Basildon Borough Council, 144	Yes	The Council supports this modification as a factual update.	

### Modification M49 – Land off Axial Way, Myland, Colchester

Person ID, Organisation, Comment ID	Do you agree with proposed modification M49?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
990583, The Churchmanor Estates Co Plc, 19	No	This has consequential effects on the designation of Areas of Search as defined on the relevant maps. We therefore object to the relevant modifications 49 and 50.	At Appendix 21 the land that has been removed (currently allocated for employment development) should be reinstated i.e. that between the community stadium and the land retained in the Area of Search

### Modification M50 – Tollgate, Stanway, Colchester

Person ID, Organisation, Comment ID	Do you agree with proposed modification M50?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
990583, The Churchmanor Estates Co Plc, 20	No	This has consequential effects on the designation of Areas of Search as defined on the relevant maps. We therefore object to the relevant modifications 49 and 50.	At Appendix 22 (land at Tollgate) the area immediately to the north of the Wyvern farm residential development (currently allocated for employment development) should also be retained.

### Modification M51 – Langston Road/Oakwood Hill, Loughton, Epping Forest

Person ID, Organisation, Comment ID	Do you agree with proposed modification M51?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
922196, 25	No	I have received advice from EFDC's Assistant Director of Environment following a conversation he had with the Head of ECC Commission for Waste that I should continue to make my comments through the consultation process and therefore my comments and objections relate to a previously proposed Waste site W19 at Hastingwood M11 J7 Epping Forest District and a site mentioned in Appendix 23 - Langston Road/Oakwood Hill, Loughton Epping Forest District. Appendix 23 - Langston Road, Loughton, Epping Forest District - I object to this site being	

Person ID, Organisation, Comment ID	Do you agree with proposed modification M51?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		included in the waste plan. I understand that the boundary in Langston Road has now been altered. It would be more helpful to confirm that EFDC's site has been withdrawn by ECC from the potential list of waste sites. Planning consent has been granted for EFDC to develop a Retail Park in Langston Road. The construction of these retail units is underway and the necessary associated roadworks have been commenced in consultation with ECC.	
1058318, Loughton Town Council, 32	Unrelated	However, we draw Essex County Councils attention to an amendment required to the plan in Appendix 23 on page 85. This should be re-labelled to correct the reference to Langston Road and Oakwood Hill and not Langston Road and Oakland.	
1058324, Transport for London, 36	Unrelated	Thank you for consulting Transport for London (TfL) on the modifications to the replacement Essex Waste Local Plan following the recent Examination in Public. TfL notes the minor factual modification reflecting recent planning permissions at the Langston Road/Oakwood Hill area of search which is adjacent to London Undergrounds Central Line tracks and Debden station. I can confirm that TfL has no comment to make on the proposed modifications	

### Modification M52 – Glossary ‘Residual Waste’

No Comments Received

### Modification M53 – Glossary ‘Water Bodies’

Person ID, Organisation, Comment ID	Do you agree with proposed modification M53?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
1063440, Natural England, 498	Yes	We support the clarification proposed.	

### Unrelated Representations

Person ID, Organisation, Comment ID	Do you agree with proposed modification?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
1053529, Essex Chambers of Commerce, 5	Unrelated	Thank you for details of the above consultation. Having read through the consultation documents we have no comments to make on the proposed amendments.	
1056431, Highways England, 6	Unrelated	Thank you for your consultation. We are content that the proposals will not have a severe impact upon the Strategic Road Network.	
609943, KTI Energy Limited, 14	Unrelated	Government Policy In the preparation of its Replacement Waste Local Plan, Essex County Council is obliged to comply with s.2.5.26 and s.2.5.27 of National Policy Statement for Renewable Energy Infrastructure (EN-3) 2011, s.97 of National Planning Policy Framework 2012, and s.1 and s.4 of National Planning Policy for Waste 2014. In each case, Government policy expects Essex County Council to identify opportunity for Combined Heat & Power with particular emphasis upon promoting sustainable development amongst communities. That should tell the County Council that emphasis should be placed upon maximising mitigation of climate change by the installation of extensive district heating networks which deliver low carbon heat to new and	

Person ID, Organisation, Comment ID	Do you agree with proposed modification?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>existing properties. S1 2010 No 695 The Replacement Waste Local Plan is authorised to promote all those waste disposal projects which are authorised by Environment Agency under Chapter 5, viz. landfill, incineration and processing. There is no evidence that Essex County Council is authorised to promote power projects fired by virgin/waste biomass fuel which are authorised by Environment Agency under Chapter 1 of that document as private utilities. Furthermore, Essex County Council believes itself qualified to dismiss the proposed licensed renewable CHP scheme serving Dunton Garden Village by its wrongful belief that it is an incinerator on Green Belt land hence justifying issue of "Red" against the traffic signal assessment it uses for new waste disposal facilities. Dunton Garden Village The Minister on 2 January 2017, when awarding the Brentwood side of Dunton Garden Village its enhanced status, removed that land from the Green Belt. KTI Energy Limited responded by inviting Basildon Borough Council to modify its Local Plan to do the same with its half of the Village. The outcome is the attached letter and site plans which will enable both local authorities to achieve their climate change obligations. The CHP plant itself has been re-located on the Brentwood side of land in the ownership of Barrie Stone to be out of Green Belt. The alignment of 7.5km long district heating main from Friern Manor Farm to Gardiners Lane South is described elsewhere for Basildon Borough Council to plan and enter into its Local Plan. The Schedule of Modifications confirms Essex County Council is evaluating an eastern CHP project. However, it is unlikely to achieve the 60,000kWth to 75,000kWth heat target set for the western scheme. Request of Essex County Council The formal request made of Essex County Council is that it cooperates with East London Waste Authority, Basildon Borough Council and Brentwood Borough Council in the provision of virgin/waste biomass fuel according to schedule:- a) Essex County</p>	



Person ID, Organisation, Comment ID	Do you agree with proposed modification?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>Council to produce 200,000 t/a fuel to specification from MSW for delivery to the CHP plant on Friern Manor Farm; b) East London Waste Authority to produce 200,000 t/a fuel to specification from MSW for delivery to the CHP plant on Friern Manor Farm; c) 2nd tier waste contractors operating in London/Essex to produce 200,000 t/a fuel to specification from C&amp;I/C&amp;D waste for delivery to the CHP plant on Friern Manor Farm.</p> <p>This request is legitimately founded upon policy expressed by both Essex County Council and East London Waste Authority several years ago that the production of virgin/waste biomass fuel from household and non-household waste is to be deployed for Chapter 1 power/CHP generation process and not Chapter 5 incineration process. The Rivenhall incinerator hence is not an approved outlet for fuel produced by the Burnt Mills processing plant. See attachment - KTI Energy; correspondence with Basildon Council.</p>	
1057637, Peterborough City Council, 21	Unrelated	I have read through the proposed modifications to the Replacement Waste Local Plan and do not have any comments to make. Please however keep me informed of future consultations.	
922196, , 24	Unrelated	I have received advice from EFDC's Assistant Director of Environment following a conversation he had with the Head of ECC Commission for Waste that I should continue to make my comments through the consultation process and therefore my comments and objections relate to a previously proposed Waste site W19 at Hastingwood M11 J7 Epping Forest District and a site mentioned in Appendix 23 - Langston Road/Oakwood Hill, Loughton Epping Forest District. W19 M11 J7 Epping Forest District - This is a totally inappropriate site as it is in the Green Belt. it makes an important contribution in safeguarding the countryside from encroachment. There are 5 houses including a Grade 2 listed building in close proximity to the proposed site. In addition there is St Clare's Hospice nearby. These would have to endure even greater noise, dust	

Person ID, Organisation, Comment ID	Do you agree with proposed modification?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>and dirt and it would be detrimental to their amenity. In addition Listed Building Latton Priory (Augustian) is also in the vicinity. Adjacent to the proposed site is a McDonald's restaurant and also a cafe/restaurant at the adjacent Garden Centre. Food outlets such as these would be affected by the dirt and dust and food preparation could be compromised. The amenity of customers and users of both these sites would be affected. Ingress and Egress with the intensification of HGV's serving the site would increase congestion on an already over capacity junction. The slow moving lorries would contribute to further backing up and queuing at junction7. This junction is constantly jammed at present due to the volume of traffic, particularly at peak times. Any problems/accidents on M25 brings even greater traffic along this route and even greater gridlock being created, which is affecting the towns of Epping and Harlow. In addition, there are the problems it causes to the village of Hastingwood eg Volume of Rat runners and huge HGV's using a rural country road, where they are over the centre line of the road. There would also be a further deterioration in the air quality surrounding Junction 7. Highway Officers have stated that even with introduction of J7A, Junction 7 would continue to be over capacity as there is likely to be significant growth around Harlow.</p>	
1058318, Loughton Town Council, 33	Unrelated	On behalf of Loughton Town Council, I write to advise that members have considered the consultation documents but did not wish to comment on the proposed modifications.	
910365, Brentwood Borough Council, 37	Unrelated	Thank you for consulting Brentwood Borough Council on the Essex and Southend-on-Sea Replacement Waste Local Plan Schedule of Modifications. I can confirm that at the Planning and Licensing Committee on the 24 January 2017 members resolved to approve a response of 'no comment' to the consultation.	
922471,	Unrelated	At the Planning and Highways Committee held on 26 January	

Person ID, Organisation, Comment ID	Do you agree with proposed modification?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
Galleywood Parish Council, 108		2017 it was agreed to submit a comment of No Comment on the Joint Replacement Waste Local Plan.	
1060937, Colchester Cycling Campaign, 114	No	Please ignore the "no" above. CCC has only just heard of this consultation. We would like to make a late appeal for inclusion of the following: :: The imposition of standards that align with the current policy of Transport for London and associated local government organisations in the London area to cover control and supervision of ECC and contractors' vehicles. These standards should ensure that all vehicles meet the current and ongoing safety standards for lorries in respect of visibility of and protection for cyclists and pedestrians, especially in urban situations. The imposition of standards that align with the current policy of Transport for London and associated local government organisations in the London area to cover control and supervision of ECC and contractors' vehicles. These standards should ensure that all vehicles meet the current and forthcoming emissions standards for lorries and other vehicles. Installation of real-time air quality monitors in areas where there are maximum lorry movements (i.e. within the yard and any nearby homes, retail).	
1061567, Maldon District Council, 150	Unrelated	Thank you for giving Maldon District Council the opportunity to consider and respond to the consultation on the Essex County Council Replacement Waste Local Plan Schedule of Modifications. We note the modifications made to the Waste Plan but do not wish to make any representations at this stage. The Council reserves the right to make representations to any further modifications made to the plan.	
1062089, Coggeshall Parish Council, 333	Unrelated	We believe the plan does nothing other than regurgitate the existing approach to waste, when a paradigm shift is needed. We wish to express our disappointment that the plan does not reflect ECC own published waste plan and their intent to be 50-60% recycled relying on a Burn and Bury solution with a total lack of forward thinking to addressing waste with no	

Person ID, Organisation, Comment ID	Do you agree with proposed modification?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		consideration being given to innovative schemes such as those repurposing plastics for construction bricks for example.	
741248, Ongar Town Council, 337	Unrelated	At the Councils Planning, Environment and Public Relations committee held on the 9th February 2017, councillors confirmed that they had no comments to make on the proposed modifications of the Plan.	
1062191, Nuclear Decommissioning Authority and Magnox Limited, 355	Unrelated	Paragraph 5.3 It is noted that the WPA has proposed no modification to paragraph 5.3. The NDA and Magnox Limited reiterate their previous comment that the following text should be added to paragraph 5.3 to acknowledge and clarify the statutory position with regard to the proximity principle and the management of radioactive waste (and to align with the principles of the NPPW): "Proposals for the management of radioactive waste emanating from beyond the Plan area should meet a need that is not provided for in the area of origin. They should also comply with national strategies for waste management and for radioactive waste management specifically, in the latter case including those produced by the Nuclear Decommissioning Authority." Waste planning authorities (WPAs) are required to have regard to Article 16 of EU Waste Framework Directive 2008/98/EC, which requires Member States to take account of the principles of self-sufficiency and proximity. Whilst Directive 2008/98/EC specifically excludes radioactive waste from its scope in Article 2, from a radioactive waste management perspective, disposals of waste are subject to the requirement of Best Available Techniques (BAT) for which the proximity principle is a factor the EA would expect to be considered. National Planning Policy for Waste (NPPW) (October 2014) describes the Governments ambition to work towards a more sustainable and efficient approach to resource use and management. Key principles in the NPPW include the consideration of need for additional waste management capacity of more than local significance, collaborative working between waste planning	

Person ID, Organisation, Comment ID	Do you agree with proposed modification?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		authorities, and account for waste management arising in more than one waste planning authority area where only a limited number of facilities would be required or existing facilities are under-utilised.	
1062191, Nuclear Decommissioning Authority and Magnox Limited, 358	Unrelated	Appendix A It is noted that the WPA has proposed no modification to Appendix A of the Pre-Submission Draft version of the RWLP. Appendix A details the policy context to the Plan. Reference to up-to-date policy within this Appendix is critical as it underpins the references to national strategy, policy and guidance that are contained throughout the RWLP. The current absence of the NDA Strategy from the list of "National Policy and Strategy" needs to be addressed and the relationship of the strategy to the RWLP, given the presence of nuclear radioactive waste streams in Essex and the neighbouring WPAs of Suffolk and Kent, needs to be acknowledged. As such, the NDA and Magnox Limited reiterate their previous comment that Appendix A should include reference to the following: UK Strategy for the Management of Solid Low Level Waste from the Nuclear Industry (February 2016) Nuclear Decommissioning Authority Strategy Effective from April 2016 ("NDA Strategy III") National Policy Statement for Nuclear Power Generation (EN-6)	
1062191, Nuclear Decommissioning Authority and Magnox Limited, 361	Unrelated	This representation has been made by GVA on behalf of the NDA and Magnox Limited in response to the current consultation on the Essex County Council and Southend-on-Sea Borough Council Joint Replacement Waste Local Plan, Schedule of Modifications. In summary, while the NDA and Magnox Limited welcome amendments to the RWLP to ensure consistency with their representations to the consultation on the Pre-Submission Draft version of the RWLP, they maintain their view that further minor modifications (as detailed within this letter) are still required for the Plan to be considered sound.	

Person ID, Organisation, Comment ID	Do you agree with proposed modification?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
923423, Fairfield Partnership, 488	Unrelated	<p>I write on behalf of our client Fairfield (Elsenham) Ltd (part of and hereafter referred to as The Fairfield Partnership (TFP)) in response to the above consultation. TFP controls land to the north east of Elsenham in Uttlesford District and is promoting long-term, strategic development in this location. TFP has played an active role in Replacement Waste Local Plan and has made written representations at the Issues and Options stage, Revised Preferred Approach stage and Pre-Submission stage with reference to allocation Site W8, Elsenham TFP has no comment to make on the proposed modifications as published. However, in reviewing background information related to the examination it is noted that the hearing agenda for Day 2 included a supplementary question: Q54: what does the dismissal of the recent appeal (2213025) indicate as regards the possibility of housing in the vicinity during the plan period? TFP is concerned that the Inspector did not seek its views on this point: 1. The Parish Council who were present at the Examination were active participants in opposing the appeal proposals. 2. TFP were the appellant. As a participant in the Replacement Waste Local Plan process, and in the interests of balance TFPs views should have been sought on this matter. In view of the above concerns, TFP would welcome your confirmation whether the Inspector has attached weight to any views expressed on Q54 in arriving at the proposed modifications to the Waste Local Plan, and in considering the soundness of allocation Site W8, Elsenham. I would also welcome sight of any notes that may exist of the discussions of Q54 at the Examination.</p>	

Person ID, Organisation, Comment ID	Do you agree with proposed modification?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
1064021, Manchester Airport Group, 505	Unrelated	<p>London Stansted Airport is an officially safeguarded aerodrome and under ODPM Circular 1/2003 (Safeguarding Aerodromes, Technical Sites and Military Explosive Storage areas: The Town and Country Planning Direction 2002), there is an obligation on local planning authorities to consult safeguarded airports on planning applications for developments which have the potential to impact the safe operation of aircraft or which may prejudice the Airports future development. The safeguarding map, which is issued to local planning authorities by the Civil Aviation Authority, shows the extent of the safeguarded area and sets out the requirements for statutory consultation with the Airport. The safeguarded area for Stansted Airport covers part of Essex County and it is therefore important that aviation operations are protected. Further to our previous response to the Essex County Council and Southend-on-Sea Borough Council Joint Replacement Waste Local Plan consultation, we wish to re-emphasise that of the proposed Strategic Site Allocations, there are a number of sites located close enough to the Airport to require further assessment, these are: Elsenham, Uttlesford (Reg 18 ref: W8); Crumps Farm, Gt and Lt Canfield, Uttlesford (Reg 18 ref: W32); Little Bullocks Farm, Great and Little Canfield, Uttlesford (Reg 18 ref: L(n)7R); Little Bullocks Farm, Great and Little Canfield, Uttlesford (Reg 18 ref: L(n)8R). The above allocations, and other waste development applications that may come forward within the airports safeguarding area, will require assessment from an aerodrome safeguarding perspective on a site-by-site basis. In line with ODPM Circular 1/2003 (Safeguarding Aerodromes, Technical Sites and Military Explosive Storage areas: The Town and Country Planning Direction 2002), the aerodrome safeguarding authority must be consulted on applications that are within 13km of the aerodrome that have the potential to attract birds. For example, significant areas of landscaping, water bodies, nature reserves, waste facilities, sewage works and mineral</p>	

Person ID, Organisation, Comment ID	Do you agree with proposed modification?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		extraction or quarrying. In addition, certain open-air waste centres have the potential to increase the level of bird activity in the vicinity of the airport. Consequently such proposals require a detailed assessment and potential controls and mitigation measures to ensure the risk of bird strike is not increased. These can be considered as proposals are brought forward at the application stage.	
908779, Chelmsford City Council, 545	Unrelated	Thank you for consulting Chelmsford City Council on the above consultation. Please be advised that we have no comments to make on the proposed modifications. This response has been agreed by Chairman and Vice-Chairman of the Chelmsford City Councils Development Policy Committee and the Director of Sustainable Communities.	
1064805, Environment Agency, 556	Unrelated	Thank you for consulting us on the modifications to the plan. Our apologies for the late response, however, we write to confirm we have no objections to any of the modifications proposed.	
983846, Network Rail, 557	Unrelated	As the proposal at this stage is an outlined document, we have no comments at this stage, however it would be prudent to keep us informed of any site specific proposals that are within 250 meters of the railway as this will give us an opportunity to review and assess the risk to our infrastructure and we will respond accordingly.	
1064832, Medway Council, 558	Unrelated	Having assessed the modifications, we have no further comment to make regarding the plan; however we would like to continue to be informed of further progress towards its adoption.	



## MC2 – Site Assessment and Methodology Report Addendum

Person ID, Organisation, Comment ID	Do you agree with proposed modification?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
<b>M17 – Morses Lane, Brightlingsea</b>			
1057254 (15)	No	<p>Thank you for the opportunity to both view and comment on <a href="http://www.essex.gov.uk/Environment%20Planning/Planning/Minerals-Waste-Planning-Team/Planning-Policy/Documents/MC2_%20SiteAssMethod_ReportAddendum%20_January2017FINAL.pdf">http://www.essex.gov.uk/Environment%20Planning/Planning/Minerals-Waste-Planning-Team/Planning-Policy/Documents/MC2_%20SiteAssMethod_ReportAddendum%20_January2017FINAL.pdf</a></p> <p>In Site Selection Criteria 3D , - Proximity to Sensitive Receptors, your very thorough appraisal highlights and flags up that</p> <p>in this category 3 RED Judgements are shown. Highlighting the impact that this development would have on nearby homes, school etc. Surely on these judgements alone, notwithstanding the other amber3 judgements, this development cannot be allowed to proceed as this site is quite unsuitable.</p> <p>Furthermore Brightlingsea has only one road in and out and an increase in traffic would be detrimental to the highway and the additional pollution we would all have to suffer.</p> <p>As I have pointed out previously why not use the Martin's Farm site which would have few of the potential problems that you have identified with Morses Lane site.</p>	
984933, 126	No	<p>This comment relates to Main Modification 17 regarding site W31 Morse's Lane, Brightlingsea. I submit that the Modification, while welcome, fails to address the two major points of my comment on the Pre-Submission Draft, reference 351. Specifically:- (1) Map 3 of the Draft RWLP, which purports to show all existing and under-construction facilities in Essex, is deficient by the exclusion of the Oliver's Wharf waste-</p>	<p>(a) The Examiner should require Essex CC to provide a complete version of Map 3. This should be examined to determine if new data indicates revision of the Site Allocations. (b) The Judgements Guidance of code Red for criteria in 3D (Proximity to Sensitive Receptors) does not actually give any guidance as to what it indicates. I submit that it should indicate further study is</p>

Person ID, Organisation, Comment ID	Do you agree with proposed modification?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>handling facility at Brightlingsea Harbour. I note that the Morse's Lane Applicant, Eastern Waste Disposal (EWD), has submitted a new Proforma wherein section 3D acknowledges that "The site is within 1km of ..... Brightlingsea, which is within 1km of an existing waste management facility. Therefore, there is a potential for cumulative effects." Consequently, the criterion 3D judgements have changed to code Red, acknowledging that Brightlingsea residents will be exposed geographically to a double jeopardy from Oliver's Wharf and Morse's Lane. I welcome this recognition, but seek further clarification (see changes, below). I note also that Oliver's Wharf has a wider permission ("Unspecified Transfer") than Morse's Lane. As a consequence, it is now being used by EWD for hazardous waste material handling (WEEE, large domestic appliances). I note also that another preferred applicant, JJ Prior (JJP), submitting for site L15 Fingringhoe Quarry as an inert landfill site, has selected Oliver's Wharf as an export waste transfer point (for shipments to Ballast Quay). The above facts are material to the Site Selection process, as they are contributory to the "cumulative effects" of the two sites. (2) I expressed the opinion that the Critical Path as regards road traffic was the "Last Mile and a Half" between Site W31 Morse's Lane and Brightlingsea Harbour. This comment was dismissed by the examiner because "It has not been suggested by the site promoter that transport of waste will be from wharf facilities in Brightlingsea". Yet, the Applicant's Proforma has been scored three code Greens for Traffic &amp; Transport because it has "Appropriate connection .... to a wharf". Brightlingsea port was deemed unsuitable for expansion in the 2007 Tendring District Local Plan, due to constraints of the adjacent road network. This policy was endorsed by the Department of the Environment. Despite this, traffic has increased relentlessly since the re-opening of Oliver's Wharf in 2015. It is essential that EWD submit a credible plan for their usage of this critical path. It is already a</p>	<p>required. The examiner should seek clarification of this point, then incorporate the appropriate indication into the Proforma for Morse's Lane. (c) The allocation of code Green for criteria in 2B (Traffic &amp; Transport) at Morse's Lane should be changed to Amber 3, indicating that a major issue (traffic path to harbour) requires further study. (d) The examiner should inform JJP that I have commented on their prospective use of Oliver's Wharf in connection with their application for Site L15 Fingringhoe Quarry.</p>

Person ID, Organisation, Comment ID	Do you agree with proposed modification?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>major user of the wharf for export of its separation products (firewood, metal) from Morse's Lane. Also, EWD feed substantial van and LGV traffic directly to the harbour estate, where their WEEE recycling operation is based. It is perfectly sensible to infer that the wharf and harbour estate play a major part in EWD's operational plans for expansion at Morse's Lane. As I noted in section (1) above, JJP have elected to use Oliver's Wharf for exports to Fingringhoe. Also, there is now a substantial flow of imported aggregates, primarily for Silverton (a materials retailer). These two flows will exacerbate demand on Brightlingsea's limited traffic capacity, and they should consider in conjunction with EWD's traffic demand. As regards physical aspects of this critical path, it is notable that inward harbour traffic takes a signed divergence from the B1029 at the end of Church Road. The route is then Spring Chase/Lower Park Road/Colne Road/Waterside onto Copperas Road (the "Dock Road") at the harbour estate. Colne Road is a particular bottleneck, being single-lane with passing points, and Waterside is single lane, both constraints being due to street parking. New Street, the final stretch of the B1029 within Brightlingsea settlement, is presently being improved, and will likely be subjected to overflow traffic. Further capacity can only be achieved by routing inward traffic over the B1029 and return traffic over the existing harbour route. Both routes are in densely-populated and densely-used areas, and I am concerned for the amenity of residents and (particularly) users of Brightlingsea Infants and Junior Schools. In conclusion: For the above reasons I submit that Main Modification 17 has not been positively prepared. Thus the examination of the Application for expansion of Site W31 Morse's Lane does not meet the requirement for soundness.</p>	
1061227, 125	No	<p>The site is in the town and not 1km from the settlement. The dwellings in Samsons road are not new construction at least 50yrs old. The site is surrounded on 3 sides by houses, a school and a supermarket. The highway as highways would</p>	<p>As it is impossible to contain dust in the lorries or on site , for the health of the town free from dust and noise this operation should not be approved in this location. My suggestion is to install it away from built up areas ,</p>

Person ID, Organisation, Comment ID	Do you agree with proposed modification?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>know if they had done a survey is not wide enough for max width lorries most of the way to Frating. Representing Breathe Easy support groups for the British lung foundation we are currently campaigning for clean air in urban areas nationally in line with governments high priority in this area It is of great concern that an increase in diesel particulates and dust will not only have a detrimental effect on people with a lung condition but overall. As you are well aware Inert waste may be biologically stable but is still harmful when ingested. For your information the discharge from ex plant have already entered the supermarket Aircon vents on occasions ,the odours making it a very unpleasant environment</p>	<p>schools etc. and built it either next to the Viola transfer tip on the A120 or to the closed amenity site at Martins Farm</p>
1061547, 146	Yes	<p>I agree with the revision of Appendix 15 Table 14 to upgrade Morses Lane Assessment Sources - 3D from Amber 3 to Red and 3K from Green to Amber 2.</p>	
981289, 202	No	<p>I have looked at the proposed modifications to the Joint Replacement Waste Local Plan, site selection criteria 3D and note that 3 RED and also AMBER 3 judgements are shown with regard to proximity to sensitive receptors in the Morses Lane site. This highlights the harmful impact that this development will have on the surrounding environment. As a result I feel that this site is quite unsuitable for the proposed development and should not be allowed to proceed. I was also very disappointed to see that traffic access to the site had been given a green judgement. How can this be considered acceptable when the increase in lorry traffic to the site will be by way of a small local road with residential buildings, a secondary school and a supermarket in close proximity? The increase in traffic pollution will be detrimental to the health and safety of local residents. An alternative site should be found which allows traffic access by main roads only and is not within a residential area. I hope you take these points into consideration when making a final decision on the proposed development.</p>	

Person ID, Organisation, Comment ID	Do you agree with proposed modification?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
1062280, NEEB, 384	No	<p>I write on behalf of NEEB Holdings Ltd in connection with the current focused consultation being held in respect of the above. We wish to make the following comments in respect of the document. We maintain our objection to the inclusion of site W31 of the proposed Replacement Waste Local Plan. We have identified omissions and inaccuracies in the site assessment for W31 which are set out under the heading MC2: Site Assessment and Selection/Methodology Report addendum below. We respectfully request that the site be reassessed in light of these points. We believe that the site is unsuitable and should not be allocated for waste development. Notwithstanding the foregoing we note the Inspectors findings in relation to the draft plan and, should the plan progress without the omission of site W31 once our comments have been addressed, we respectfully request that the changes detailed below are made prior to it progressing.</p> <p>MC2: Site Assessment and Selection/Methodology Report addendum Page 4 W31 - Morses Lane, Brightlingsea, Tendring (Main 17) Table introduced as follows Significant issues from the site assessment for Morses Lane include:</p> <p>RESPONSE: the table provides an estimated capacity of 75,000tpa information in the public domain suggests that this capacity will not be fulfilled despite the plan identifying significant need for facilities of the type proposed this suggests that the Plan is partially undeliverable</p> <p>DETAIL: representations made by the promoter dated February 2016 state: ECC wants to make available 75,000 tonnes of extra inert processing capacity at Morses Lane. EWD proposes that this capacity in reality is split between Brightlingsea and Ardleigh, purely to limit lorry movements. This indicates that the site would actually deliver only half of the capacity it is proposed to be allocated for. The allocations</p>	

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		<p>ability to meet the needs identified in the plan has not therefore been demonstrated and it is respectfully suggested that the site should not be allocated on the basis that it compromises the delivery of the plan</p> <p>Page 42 Stage 3 Site Selection Criteria Stage 3D Proximity to Sensitive Receptors</p> <p>RESPONSE: the site receives are judgement in respect of all types of waste management facilities in relation to this criterion - the purpose of the scoring system is presumably to assess the suitability of the various sites being considered the Red judgement must therefore indicate that the site is unsuitable and should not be progressed</p> <p>DETAIL: The Councils response to the Inspectors Main Matters and Issues states that: It is noted in the representations that there is no mention of the school under Criterion 3D Proximity to Sensitive Receptors and therefore there is the potential that the school may not have been included in the assessment. However, even if the school Essex and Southend-on-Sea Replacement Waste Local Plan- Examination Response to Inspectors Main Matters and Issues was to be factored in to the assessment, due to the score being calculated using address points, this would not change the score from Amber 3 to Red. This implies that a change in the score from Amber 3 to Red would be significant. The fact that the site does in fact score Red and not Amber 3 is significant and highlights site W31s inherent unsuitability for accommodating a waste transfer station and waste processing There are a number of existing and approved sensitive receptors within 250 metres of the site in relation to waste transfer stations Planning for Waste Management Facilities: A Research Study provides: Sites closer than 250 m from residential, commercial, or recreational areas should be</p>	

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		<p>avoided. Transfer routes away from residential areas are also preferable. Taking into account the sites Red judgement and the guidance provided by Planning for Waste Management Facilities it is contended that the site is not suitable for waste management development and therefore that it should be removed from the draft Plan</p> <p>Page 52 Stage 3 Site Selection Criteria Stage 3L Proximity to Key Centres of Growth</p> <p>RESPONSE: the assessment approach adopted for this criterion is flawed</p> <p>DETAIL: The Council argues in its response to the Inspectors Main Matters and Issues states that: Within the Site Assessment and Methodology Report (SD-16), the performance of sites in relation to the proximity principle was assessed under Criterion 3L- Proximity to Key Growth Centres. This is calculated as the shortest distance (measured as the crow flies) between the site boundary and the boundary of each growth centre. Morses Lane (W31) scored green in respect of Criterion 3L; the site is calculated as being 8km away from the nearest centre of growth; Colchester. If distances had been calculated to the urban growth centre or by highway travel distances, this would change the score from Green to Amber 1. However as all sites have been calculated in the same manner, this would not change the overall outcome of the site assessment process. This is not correct. The fact that the same approach has been taken to assessing all sites does not make the assessment sound. Driving distances between key centres and proposed sites in comparison to as the crow flies distances will vary significantly. Driving distances will be significantly more than The as the crow flies distances in some cases, whereas in others the two may be similar. As the crow files distances are therefore not an</p>	

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		<p>appropriate proxy for proximity of sites to key centres. It is respectfully requested that all sites be reassessed against this criteria using driving distances rather than as the crow flies distances</p> <p>Councils response to the Inspectors Main Matters and Issues Page 1 6.1 Is the allocation deliverable having regard to highway and traffic considerations, including the safety of uses of the nearby school?</p> <p>RESPONSE: the Councils response document states: The site is located within an existing industrial estate, with waste related activities already occurring on the site. this is inaccurate and misleading and it is requested that it be corrected</p> <p>DETAIL: The site is not within an existing industrial estate and does not have waste related activities occurring on it While the site is allocated as an Allocated Employment Site and a Principal Business and Industrial Area it should be noted that the site is vacant / managed grassland and is undeveloped Requested changes</p> <p>MC2: Site Assessment and Selection/Methodology Report addendum Page 38 Stage 3 Site Selection Criteria Stage 3A planning background</p> <p>RESPONSE: the justification text provided in respect of all three types of possible facility is factually incorrect it is requested that this be corrected</p> <p>DETAIL: reference is made to previous permissions being granted for a waste transfer station and for an increase in tonnage restrictions for the same facility (ESSO/04/05/TEN &amp;</p>	



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		<p>ESS/04/11/TEN). Both these permissions relate to the site next door to site W31 and not site W31 itself. Site W31 does not have, nor has previously had any planning permissions for waste related development. It is requested that the justification text be amended to make it clear that site W31 does not have any existing or historic waste planning permissions.</p> <p>Page 42 Stage 3 Site Selection Criteria Stage 3D Proximity to Sensitive Receptors</p> <p>RESPONSE: the justification text provided in respect of all three types of possible facility does not make reference to 4 recently approved dwellings it is requested that the text be amended to address this</p> <p>DETAIL: Planning permission 16/00057/FUL was granted in January 2016 for development of 4 no. bungalows with associated garages at land to the north of Samsons Road (opposite numbers 47 to 55) The site is less than 100 metres from site W31 Construction of the development is due to commence and be completed in 2017</p>	
1062818, 429	No	<p>Although modifications to W31 are currently in progress I feel that certain inaccuracies have been portrayed in the site selection criteria and I would like clarification as to why this site is being allowed to proceed. In the Stage 3 summary 3C, 3H, 3I, 3J and 3K have all amber judgements. 3D - proximity to sensitive receptors open air/enclosed and enclosed thermal has three red judgements. However, 2B has been allocated green - why? Has the Highways Authority conducted an up to date professional traffic survey to ascertain the present and potential increase in HGVs using the B1029 with its hazardous bends and two small local residential roads (Sampson and Bateman) to reach the site. The B1029 is used for ferrying children to and from various local villages/areas to the secondary school, local business traffic, Moverons Farm HGV</p>	

Person ID, Organisation, Comment ID	Do you agree with proposed modification?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		quarry traffic, housing development traffic, half hourly bus service plus general local traffic. Your complete disregard of the safety and environmental comments against the plan suggest the whole scheme stems from a desk/office based decision. A facility of this nature should be located on a main A road with better access for the volume of traffic that will be using it. One where there is no immediate housing, schools, etc. If this scheme goes ahead, regardless of the impact on the town, particularly those facilities and homes in close proximity to the site, how will the processed material leave the site? Will it be by lorry back through the same route or is there a possibility of the wharf being used? The increased use of the wharf would be totally unacceptable as the road leading to it is unfit for increased heavy traffic. In view of the above I feel that the above scheme should not go ahead. I look forward to your responses/comments to my above queries.	
<b>M21 – Sunnymead, Elmstead and Heath Farms</b>			
496468, David L Walker Limited, 9	Yes	Tarmac support the main modification 21 with the inclusion of C&D recycling within the plant site area for site L (i) 5, subject to a few comments on the issues and opportunities which are detailed on the form attached. No further comments are presented in respect of the remainder of the main consultation document. Please find attached completed response form covering the comments on Appendix 17 above, covering details for site L(i)5 (table 19). We note the new assessment profile in document MC2 for site W36 (as a replacement for site W13) Tarmac agree with the majority of the assessments apart from question 3D of site W36, where we do not believe that 66 sensitive receptors are within a 250m radius of the site. The plan extract attached only shows a handful of properties to the east of the proposed allocation within a 250m radius. As such the site should be scored Amber 1.	
<b>M23 – Dollymans Farm</b>			
1061767, 246	No	There are errors in the paperwork which call into question the	Postpone Dollymans farm inclusion until a full review has

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		<p>validity of the whole report. <a href="http://www.essex.gov.uk/Environment/Planning/Planning/Minerals-Waste-Planning-Team/Planning-Policy/Documents/MC2_SiteAssMethod_ReportAddendum_January2017FINAL.pdf">www.essex.gov.uk/Environment/Planning/Planning/Minerals-Waste-Planning-Team/Planning-Policy/Documents/MC2_SiteAssMethod_ReportAddendum_January2017FINAL.pdf</a>:</p> <p>Stage 3, section K states: Open Air - Judgement: Green  Justification: Directly adjacent to PRoW. but the Judgements Guidance states: Green : Sites not containing PRoW or within 100m of formal open spaces, such as outdoor sports facilities, parks and gardens, children's equipped play space and school grounds and playing fields. Amber 2 : Sites directly adjacent to PRoW and/or formal open spaces, such as outdoor sports facilities, parks and gardens, children's equipped play space and school grounds and playing fields. That changes the summary page to a median of Amber 2 from Amber 1.5, surely enough criteria to put a stop to the process? Allowing benefit of doubt that this is a genuine error it should at the very least cause the whole report to be reviewed and a further public consultation to be launched once it has been deemed accurate. Furthermore, the government inspector should be pressed to reveal why they pushed to overrule a local planning issue at such an early stage when the capacity issue is far enough away to allow for further exploration of alternative sites. And lastly any report commissioned by the land owner or their agent should be given very little weighting as there can be no guarantee the report is not biased.</p>	<p>been completed to confirm accurate and transparent reporting. Commission an independent review of the site prior to any further action.</p>

## MC3 – Sustainability Appraisal Addendum

Respondent ID	Do you agree with the proposed modification?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
<b>M1 – ‘Waste Challenge at a Glance’</b>			
985065 (46),	No	<p>Accompanying SA/SEA Environmental Report – this document makes assessments on whether the proposed Modifications have significant (as opposed to minor) sustainability impacts</p> <p><b>Appendix 1 The Waste Challenge at a Glance</b></p> <p><b>4.21 Non Hazardous Waste</b></p> <p>The Vision &amp; Strategic Objectives of this Plan therefore recognises the need to continue to make provision for imports from London, albeit at a reducing rate. After 2026, imports of non-hazardous waste to landfill should only be of non-recyclable and non-biodegradable wastes, while some provision may also be made for the management of residues suitable for energy recovery at consented plant.</p> <p>THIS IS NOT A MINOR CHANGE. AS THINGS STAND THIS CLAUSE DIRECTS RESIDUAL WASTE FROM LONDON POST 2026 TO RIVENHALL, IT BEING THE ONLY RELEVANT CONSENTED (BUT NOT BUILT) PLANT IN THE PLAN AREA. IT IS NOT CLEAR HOW SUSTAINABILITY OBJECTIVES, INCLUDING MINIMISING HAULAGE DISTANCES, PROTECTING AIR QUALITY AND ACHIEVING CO2 EMISSIONS REDUCTION WOULD BE COMPATIBLE WITH HGV HAULAGE FROM LONDON TO RIVENHALL.</p> <p>At present, the Waste Disposal Authority is considering long term management options for the stabilised residual waste output of the Tovi Eco Park Facility. In 2016, the annual 200,000 t output from this facility was exported from the Plan area. (Deleted - A competitive tender process will identify the long-term management solution for this waste, which could</p>	

Respondent ID	Do you agree with the proposed modification?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>include continued exportation from the Plan area). In line with the Plan's Strategy for the Plan area to become net self-sufficient with regard to its waste management needs where practicable, the Plan includes a site allocation which has capacity to potentially manage this residual waste in the Plan area in the longer term.</p> <p>As things stand, the allocation of srf/rdf from basildon is specifically to rivenhall. It is not clear how this allocation meets sustainability objectives including minimising haulage distances, protecting air quality and achieving co2 emissions reduction given that it is approx. 40 miles from the basildon plant to the rivenhall plant along the approved route via the a120. The only means of transporting wastes to and from the rivenhall plant would be by road.</p> <p>Ecc should demonstrate why these changes, specific to haulage distances, are minor in stating that "there will be no significant sustainability effects, or changes to the SA, as a result of this modification."</p>	
1059617 (48)	No	<p>The Vision &amp; Strategic Objectives of this Plan therefore recognises the need to continue to make provision for imports from London, albeit at a reducing rate. After 2026, imports of non-hazardous waste to landfill should only be of non-recyclable and non-biodegradable wastes, while some provision may also be made for the management of residues suitable for energy recovery at consented plant.</p> <p><b><i>This clause directs residual waste from London post 2016 to Rivenhall as it is the only relevant consented (not built) plant within the area. The HGV haulage from London to Rivenhall would not meet sustainability objectives minimising haulage distances, protecting air quality and certainly would not reduce CO2 emissions. This is not a minor change.</i></b></p>	<p>ECC need to demonstrate why these changes, specifically to haulage distances are minor and justify why they feel there are 'no significant sustainability effects or changes to the SA as a result of this modification'. Have the increase in haulage fit within the previously approved limits of the planning permissions?</p>

Respondent ID	Do you agree with the proposed modification?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>At present, the Waste Disposal Authority is considering long term management options for the stabilised residual waste output of the Tovi Eco Park Facility. In 2016, the annual 200,000 t output from this facility was exported from the Plan area. (Deleted - A competitive tender process will identify the long-term management solution for this waste, which could include continued exportation from the Plan area). In line with the Plan's Strategy for the Plan area to become net self-sufficient with regard to its waste management needs where practicable, the Plan includes a site allocation which has capacity to potentially manage this residual waste in the Plan area in the longer term.</p> <p>Currently the allocation of SRF/RDF from Basildon is specific to Rivenhall. How does this allocation meet sustainability objectives, same comments as above.</p>	
983638 (69)	No	<p>This introduces the post 2026 importation of residues from London to be incinerated in the Plan area for 'energy recovery at consented plant'.</p> <p>Rivenhall is currently the only consented plant in the plan area able to take imported London waste for incineration. There is no clear justification for this. ECC stated that 'there will be no significant sustainability effects, or changes to the SA, as a result of this modification'. I do not consider this to be only a 'minor' change when considering sustainability objectives such as; minimising haulage distances, protecting air quality and complying with CO2 emission reduction rates. Bringing waste all the way from London to Rivenhall does not comply with these objectives. It is also 40 miles from the Basildon plant to the proposed Rivenhall site, and the waste can only be transported by road, (using the A120, which is at full capacity and in urgent need of an upgrade).</p>	

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		<p>Paragraph 4.21 also states:</p> <p>At present, the Waste Disposal Authority is considering long term management options for the stabilised residual waste output of the Tovi Eco Park Facility.</p> <p>In this amendment, the original wording stating that 'a competitive tender process will identify the long-term management solution for this waste, which could include continued exportation from the Plan area' has been deleted, replacing it with 'the Plan includes a site allocation which has capacity to potentially manage this residual waste in the Plan area in the longer term'. This new sentence is specifically referring to Rivenhall only, and, as stated previously, the inclusion of this site is legally questionable, as it involves sending ECC owned waste to a not yet built private site, which currently has no environmental agency permit to proceed.</p> <p>In conclusion, the modifications relating to waste being transferred from Basildon to the proposed Rivenhall site is not legally compliant, as ECC cannot make objective decisions on this, due to having a specific interest in recommending the Rivenhall site to take ECC owned waste. In addition, this site may not even be built, due to the Environment Agency's refusal to grant a permit. ECC should have identified other potential sites for the waste that they have earmarked for Rivenhall, in order to be able to make this proposal legally compliant. The objective of the Waste Plan is to make the best choices for waste in the area, giving due regard to a variety of considerations.</p>	
1060507 Coggeshall Neighbourhood Plan	No	The Vision & Strategic Objectives of this Plan therefore recognises the need to continue to make provision for imports from London, albeit at a reducing rate. After 2026, imports of non-hazardous waste to landfill should only be of non-	

Respondent ID	Do you agree with the proposed modification?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
Committee (88), 477311, , 97 1061659, , 184 988283, 1061682, , 201, Bradwell with Pattiswick Parish Council, 238 1062089, Coggeshall Parish Council, 331 743809, , 468 1063344, , 476 618724, , 515 911132, Cressing Parish Council, 525		<p>recyclable and non-biodegradable wastes, while some provision may also be made for the management of residues suitable for energy recovery at consented plant. This is a major change not a minor one with huge impact on the local area. As things stand this clause directs residual waste from London post 2026 to Rivenhall, it being the only relevant consented (but not built) plant in the plan area. It is not clear how sustainability objectives, including minimising haulage distances, protecting air quality and achieving co2 emissions reduction would be compatible with HGV haulage from London to Rivenhall. At present, the Waste Disposal Authority is considering long term management options for the stabilised residual waste output of the Tovi Eco Park Facility. In 2016, the annual 200,000 t output from this facility was exported from the Plan area. (Deleted - A competitive tender process will identify the long-term management solution for this waste, which could include continued exportation from the Plan area). In line with the Plans Strategy for the Plan area to become net self-sufficient with regard to its waste management needs where practicable, the Plan includes a site allocation which has capacity to potentially manage this residual waste in the Plan area in the longer term. As things stand, the allocation of SRF/RDF from Basildon is specifically to Rivenhall. It is not clear how this allocation meets sustainability objectives including minimising haulage distances, protecting air quality and achieving co2 emissions reduction given that it is approx. 40 miles from the Basildon plant to the Rivenhall plant along the approved route via the a120. The only means of transporting wastes to and from the Rivenhall plant would be by road. ECC should demonstrate why these changes, specific to haulage distances, are minor in stating that There will be no significant sustainability effects, or changes to the SA, as a result of this modification.</p>	
1059617, , 230	No	The Vision & Strategic Objectives of this Plan therefore recognises the need to continue to make provision for imports	



Respondent ID	Do you agree with the proposed modification?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>from London, albeit at a reducing rate. After 2026, imports of non-hazardous waste to landfill should only be of non-recyclable and non-biodegradable wastes, while some provision may also be made for the management of residues suitable for energy recovery at consented plant. I object to this as it is not a minor change but a major one as it directs residual waste from London post 2026 to the proposed Rivenhall site, this doesn't meet sustainability objectives including minimising haulage distances, or protecting air quality. ECC must demonstrate why these changes are minor.</p>	
746050, Rivenhall Parish Council, 481	No	<p>Accompanying SA/SEA Environmental Report this document makes assessments on whether the proposed Modifications have significant (as opposed to minor) sustainability impacts. Appendix 1 The Waste Challenge at a Glance 4.21 Non Hazardous Waste The Vision &amp; Strategic Objectives of this Plan therefore recognises the need to continue to make provision for imports from London, albeit at a reducing rate. After 2026, imports of non-hazardous waste to landfill should only be of non-recyclable and non-biodegradable wastes, while some provision may also be made for the management of residues suitable for energy recovery at consented plant. And At present, the Waste Disposal Authority is considering long term management options for the stabilised residual waste output of the Tovi Eco Park Facility. In 2016, the annual 200,000t output from this facility was exported from the Plan area. (Deleted - A competitive tender process will identify the long-term management solution for this waste, which could include continued exportation from the Plan area). In line with the Plans Strategy for the Plan area to become net self-sufficient with regard to its waste management needs where practicable, the Plan includes a site allocation which has capacity to potentially manage this residual waste in the Plan area in the longer term. The Parish Council would submit these are not minor changes. As things stand this directs residual waste from Basildon, and from</p>	

Respondent ID	Do you agree with the proposed modification?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		London post 2026, to Rivenhall as an allocation. Given the distances involved (Basildon to Rivenhall is about 40 miles), and the availability of sites that are closer, it is not clear how sustainability objectives, including minimising road haulage distances, protecting air quality and achieving CO2 emissions reductions are compatible with this allocation and therefore submit this is not a minor impact.	
<b>M5 – Policy 3 ‘Strategic Site Allocations’</b>			
922693, Henham Parish Council, 27	No	Please accept this letter as an objection to the WLP modifications which is submitted on behalf of Henham Parish Council. It concerns site W8 Elsenham (inert waste recycling) to which objection was raised in the written statement and participation at the Examination in September 2016. Modifications are proposed and the Authorities have made a request to the Inspector to make several modifications to the Plan which would make it suitable for adoption. No Inspectors Report has yet been published. A modification has been proposed to policy 3 which merely amends the site's reference number. We object to the omission from these modifications because the site should be deleted as a strategic allocation, not just renumbered. New information has now been presented which fundamentally affects the suitability of the site; this has been submitted post submission of the Plan and post Examination. It is contained in the modifications to the Sustainability (SA) 2 at page 70 (emphasis added): An amendment has been made since the SA of the Revised Preferred Approach (2015) regarding historic environment impacts at W8 - Elsenham. Uncertain impacts were previously highlighted for certain facility types due to moderate issues regarding the historic environment (SO5), however a re-assessment of the site has led to a major impact issue (which may be acceptable subject to mitigation) being highlighted for all facility types. As such impacts are now negative. Our submissions on this site show that the site affects the setting of a Grade 1 Listed Building and made reference to NPPF para	

Respondent ID	Do you agree with the proposed modification?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>132 which includes: Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional. Two points flow from the re-assessment in the December 2016 SA. Firstly, because the impact on the Grade 1 listed building (and other Grade 2 listed buildings) has been raised to a major impact issue from the previous moderate issue the bar for the fundamental test of should be wholly exceptional has been raised, such that the site which previously ranked 11 out of 12 in the LUC assessment 3 must surely now be considered fundamentally unsatisfactory. Secondly, this re-assessment states that mitigation may make the site acceptable'. The importance of the buildings and their setting means that the level and nature of the impact is such (as now acknowledged) that may be unacceptable. Moreover, as this is a matter of principle, the nature of the mitigation should have been established, illustrated and agreed to be acceptable before the site was allocated, not at some time post-adoption. We therefore request that the modifications should include the deletion of site W8 at Elsenham. Please keep us advised of the progress on the Waste Local Plan. Attached to this letter are relevant parts of the response form. 1 Schedule of Modifications January 2017 2 Sustainability Appraisal and Strategic Environmental Assessment Addendum November 2016 3 LUC Site Assessment Report Dec 2015</p>	
<b>M8 – Policy 5 ‘Enclosed Waste Facilities on Unallocated Sites or Outside Areas of Search’</b>			
1060507, Coggeshall Neighbourhood Plan Committee, 89	No	<p>There is a significant question over whether the proposed Rivenhall site would still be classed as CHP following the s73 planning permission granted by ECC in early 2016. The incinerator capacity was increased by 65% but the primary user of heat the on-site paper pulping unit capacity was reduced by 53%. Given that at the previous tonnages (360,000 tpa for both CHP and the pulp unit) the site was said to use all</p>	

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		<p>the heat produced, it is not clear how the same would be true at 595,000 tpa for the incinerator and 170,000 tpa pulp. Furthermore, the environment agency refused the permit application for the Rivenhall site in December 2016 primarily because of the failure by Gent Fairhead to demonstrate bat for the incinerator/CHP unit. ECC should demonstrate why this change is minor in stating that There will be no significant sustainability effects, or changes to the SA, as a result of this modification.</p>	
<b>M13 - Policy 10 'Development Management Criteria'</b>			
1063440, Natural England, 503	Yes	<p>Sustainability Appraisal and Strategic Environmental Assessment Addendum (November 2016) Recommendation - revision to text on water resources.</p> <p>Appendix 11 Policy 10 Development Management Criteria. Recommendation. We recommend making the clear distinction between water quality and water quantity; the current additional text is unclear. We advise amending the text from:</p> <p>b. the quality of water within water bodies, with particular regard to:</p> <ul style="list-style-type: none"> <li>• preventing the deterioration of their existing status; or</li> <li>• failure to achieve the objective of good status, and</li> <li>• the quantity of water for resource purposes within water bodies.</li> </ul> <p>to the following:</p> <p>b. water resources, with particular regard to:</p> <ul style="list-style-type: none"> <li>• the quality of water within water bodies: <ul style="list-style-type: none"> <li>○ preventing the deterioration of their existing status;</li> <li>○ or failure to achieve the objective of good status,</li> </ul> </li> <li>• and the quantity of water for resource purposes within water bodies</li> </ul>	
<b>M17 – Morses Lane, Brightlingsea</b>			
East of	No	The Society maintains an in principle objection to the proposed	Proposed Amendment - insertion of bullet point: "The

Respondent ID	Do you agree with the proposed modification?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
England Co-operative Society 990357 (71)		<p>inert waste recycling facility at Morses Lane, Brightlingsea. However these representations respond specifically to the proposed modifications to the allocation, in the context of the current consultation on post examination modifications. Main Modification 17 - Table 14 Morses Lane, Brightlingsea to strengthen the intended protection of amenity, particularly for proximal land uses. However whilst the justification text appears to recognise the proximity of the allocated site to several sensitive receptors, including its location immediately adjacent to a retail store and the nearby school, this is not adequately reflected in the suggested amendments to the text. There is very little information provided on how the Council derived the suggested bullet points and why other requirements suggested previously by the Society were not included. As highlighted previously through the Examination Hearings and letter dated 14th October 2016, should the allocation proceed there are a number of absolute minimum requirements of measures that should be incorporated within the Development principles for the site. It is considered that the proposed amendments do not go far enough, as set out below in more detail. Proposed Modifications: Morses Lane Site Assessment Scores It is noted that the Council suggested modifications to the Morses Lane Site Assessment Scores "to accommodate information raised at the Hearings. In particular it amends 3D proximity to Sensitive Receptors to Amber 2. These modifications are particularly referred to within the Site Assessment and Selection Report Addendum: Rationale for Preferred Allocations (January 2017). It states that during the hearing sessions a number of elements in the site assessment proforma were inaccurate. However it then states Although updating these inaccuracies would not result in the exclusion of the site; the Authorities consider it prudent to maintain an accurate evidence base as it may be helpful to the future planning application process. However there is no discussion</p>	<p>inclusion of a statement that the facilities will be enclosed" The modification seeks to insert the following text to bullet point 5: it is expected that operations would be enclosed within an appropriate building. This is considered too ambiguous. The modification does not provide sufficient detail for the requirement to be deemed effective and it does not offer satisfactory assurance that neighbouring uses will be protected in terms of amenity. As such, it fails to meet the tests of soundness as set out in Paragraph 182 of the NPPF. The need to specify the enclosure of the facility was highlighted as a necessary requirement at the Examination Hearing session, however, to ensure this is effective and the requirements are clear, the Society considers that the aforementioned text should be amended to specify the following: The following mitigation measures will be established in the interests of protecting local amenity: All crushing, processing or other physical handling of inert waste, including all transfer of waste between vehicles to be enclosed within suitably designed and located building(s); The storage of waste or recovered materials should also be fully contained within buildings, with no external storage permissible; All vehicles carrying inert waste should have such waste fully covered, whether arriving at or leaving the site, to avoid dust entering the atmosphere on the approaches to and from the facility; The buildings should include the incorporation and maintenance of effective dust extraction technologies, to prevent the escape of dust from the process and the premises with a specific and particular emphasis on silicates; and Limits on duration (hours of operation) and noise standards (from noise sensitive properties) (as per existing text in table 14). Proposed Amendment: "Additional Bullet Point regarding the need for new development not to impact</p>

Respondent ID	Do you agree with the proposed modification?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>of the inaccuracies identified and the reasons why it does not alter the inclusion of the site. Similarly, in the Schedule of Modifications Sustainability Appraisal and Strategic Environmental Assessment Addendum November 2016) for the modifications it simply states " There will be no significant sustainability effects, or changes to the SA as a result of this modification. There is no discussion how this conclusion is reached. Given the inaccuracies identified, it is considered that further justification is required to justify the modifications, and the reasoning why the additional measures suggested by the Society were not incorporated. Summary The Society remains concerned, that despite inaccuracies and shortcomings identified in relation to this allocation at the Examination Hearing, the proposed modifications fall significantly short in ensuring that the site allocation would not result in demonstrable harm and an unacceptable impact on the surrounding area, in particular to the existing East of England Co-operative retail store.</p>	<p>on the nearby retail use" The second amendment to table 14 seeks to insert the following text to bullet point 6: The configuration and operation of the proposed facility shall have regard to impacts on neighbouring land uses, including the potential impacts on the adjacent retail use. The impact on the retail use is of great concern to the Society and this additional bullet point again provides very little information or clarity on how the Council would seek to ensure this is enforced. It should be more specific as to the requirements sought. In addition to the facility being fully enclosed as set out above, the following points are also considered necessary in relation to the impacts on the neighbouring retail use: The specification of buildings and operations are to include noise mitigation materials and measures, having regard to appropriate maximum standards at the boundary of the site; The design of any buildings to have regard to the landscape setting of the site, and its location on the fringe of the settlement; The siting of any buildings and processes on the site should have particular regard to safeguarding the health, safety and amenity of customers and staff at the immediately adjacent retail store, including the avoidance of unacceptable impacts on the rear servicing arrangements for the store, which includes the transfer of food products; The installation and maintenance of additional soft landscaping measures such as an enlarged earth bund, in addition to substantial tree planting (already specified in the submitted Plan), having regard to the effective mitigation of noise, dust and landscape and visual impacts; Sufficient vehicle parking and traffic management measures to be provided on site, including delivery reception and arrival management protocols, in order to prevent vehicles stacking and parking in Morses Lane (potentially including the</p>

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			identification of an off-site location for the stacking of vehicles away from the settlement and other sensitive receptors); This should be reinforced by the introduction of effective and enforceable parking restrictions on Morses Lane, to ensure that access to the rear servicing and staff parking areas at the adjacent retail store are kept clear at all times.
<b>M18 – Newport Quarry</b>			
1063440, Natural England, 502	Yes	Sustainability Appraisal and Strategic Environmental Assessment Addendum (November 2016) Support.	
<b>M19 - Rivenhall</b>			
985065 (47), 1060507 (89), 477311 (98), 618724, 516	No	<p>Accompanying SA/SEA Environmental Report – this document makes assessments on whether the proposed Modifications have significant (as opposed to minor) sustainability impacts</p> <p>Table 16 Rivenhall CHP</p> <p>360,000 tpa 595,000 tpa</p> <p>There is a significant question over whether the proposed rivenhall site would still be classed as chp following the s73 planning permission granted by ecc in early 2016. The incinerator capacity was increased by 65% but the primary user of heat – the on-site paper pulping unit capacity was reduced by 53%. Given that at the previous tonnages (360,000 tpa for both chp and the pulp unit) the site was said to use all the heat produced, it is not clear how the same would be true at 595,000 tpa for the incinerator and 170,000 tpa pulp. Furthermore, the environment agency refused the permit application for the rivenhall site in december 2016 primarily because of the failure by gent fairhead to demonstrate bat for</p>	

Respondent ID	Do you agree with the proposed modification?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>the incinerator/chp unit.</p> <p>Ecc should demonstrate why this change is minor in stating that “There will be no significant sustainability effects, or changes to the SA, as a result of this modification.”</p>	
1061659, 186	No	<p>There have been changes to size and scale of the site and output which seem to conflict each other. There is a significant question over whether the proposed Rivenhall site would still be classed as CHP following the s73 planning permission granted by ecc in early 2016. The incinerator capacity was increased by 65% but the primary user of heat the on-site paper pulping unit capacity was reduced by 53%. Given that at the previous tonnages (360,000 tpa for both CHP and the pulp unit) the site was said to use all the heat produced, it is not clear how the same would be true at 595,000 tpa for the incinerator and 170,000 tpa pulp. Furthermore, the environment agency refused the permit application for the Rivenhall site in December 2016 primarily because of the failure by Gent Fairhead to demonstrate that for the incinerator/CHP unit. Ecc should demonstrate why this change is minor in stating that there will be no significant sustainability effects, or changes to the SA, as a result of this modification.</p>	
988283, Bradwell with Pattiswick Parish Council, 239	No	<p>There is a significant question over whether the proposed Rivenhall site would still be classed as CHP (combined heat and power) following the s73 planning permission granted by ECC in early 2016. The incinerator capacity was increased by 65%, but the primary user of heat the on-site paper pulping unit - capacity was reduced by 53%. Given that at the previous tonnages (360,000 tpa for both CHP and the pulp unit) the site was said to use all the heat produced, it is not clear how the same would be true at 595,000 tpa for the incinerator and 170,000 tpa pulp. Furthermore, the Environment Agency refused the permit application for the Rivenhall site in December 2016 primarily because of the failure by Gent</p>	



Respondent ID	Do you agree with the proposed modification?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		Fairhead to demonstrate BAT for the incinerator/CHP unit. ECC should demonstrate why this change is minor in stating that There will be no significant sustainability effects, or changes to the SA, as a result of this modification.	
1062089, Coggeshall Parish Council, 332	No	<p>The capacities and proportion changes for Rivenhall need to be reviewed and clarified. The current view is based on the existing application and this has been rejected by the EA therefore the EIA etc. with the report is incorrect, the plant required a redesign, new stack and as such all the air quality data from the receptors the dispersion profiling and the subsequent conclusions with respect to the health impact are incorrect therefore the health risks and summaries reported are wrong We believe ECC should demonstrate why this change is minor in stating that " there will be no significant sustainability effects, or changes to the SA, as a result of this modification. " Based on the S73 application the plant has changed significantly and will change again based on the EA permit refusal and the inevitable subsequent planning applications. This means ECC simply do not know what the final plant at Rivenhall will actually be and yet they state that there will be no significant effects and are a) Allocating it in the plan despite the fact it is incomplete and currently unpermitted b) Relying on the Rivenhall plant with little or no alternatives should it (the incinerator) not come to fruition We believe there is a significant question over whether the proposed Rivenhall site would still be classed as CHP following the s73 planning permission granted by ECC in early 2016. The incinerator capacity was increased by 65% whereas the on-site paper pulping unit capacity was reduced by 53%. Given that at the previous tonnages (360,000 tpa for both CHP and the pulp unit) yet the site was said to use all the heat produced, it is not clear how the same would be true at 595,000 tpa for the incinerator and 170,000 tpa pulp with no increase in energy produced and a significant increase in CO2 outputs thereby questioning the energy from waste element aspect.</p>	

Respondent ID	Do you agree with the proposed modification?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		Furthermore, the changes in proportions are not reflected in the accompanying Environmental impact reports (these use the 2010 proportions). The new proportions for the plant are not clearly explained, evaluated and the required stack height	
743809, 469	No	Accompanying SA/SEA Environmental Report this document makes assessments on whether the proposed Modifications have significant (as opposed to minor) sustainability impacts would the proposed rivenhall site still be classed as chp following the s73 planning permission (granted by ecc early 2016)? The incinerator capacity was increased by 65% but the primary user of heat is only the on-site paper pulping unit the capacity for which was reduced by 53%. Given that at the previous tonnages (360,000 tpa for both chp and the pulp unit), the site was said to use all the heat produced, it is not clear how the same would be true at 595,000 tpa for the incinerator and 170,000 tpa pulp. The applicant needs to be asked for details on this please nb the environment agency has already refused the permit application for the rivenhall site (2016) primarily because of the failure by gent fairhead to demonstrate bat for the incinerator/chp unit. Ecc must demonstrate why this change is minor. They currently state that There will be no significant sustainability effects, or changes to the SA, as a result of this modification.	
1063344, 477	No	Accompanying SA/SEA Environmental Report this document makes assessments on whether the proposed Modifications have significant (as opposed to minor) sustainability impacts ECC SHOULD DEMONSTRATE WHY THIS CHANGE IS MINOR IN STATING THAT There will be no significant sustainability effects, or changes to the SA, as a result of this modification.	
911132, Cressing Parish Council, 526	No	Accompanying SA/SEA Environmental Report this document makes assessments on whether the proposed Modifications have significant (as opposed to minor) sustainability impacts There is a significant question over whether the	

Respondent ID	Do you agree with the proposed modification?	Brief explanation of why you agree / disagree with this particular proposed modification.	Details of what change(s) you consider necessary to resolve the issue raised.
		<p>proposed Rivenhall site would still be classed as CHP (combined heat and power) following the s73 planning permission granted by ECC in early 2016. The incinerator capacity was increased by 65% but the primary user of heat the on-site paper pulping unit - capacity was reduced by 53%. Given that at the previous tonnages (360,000 tpa for both CHP and the pulp unit) the site was said to use all the heat produced, it is not clear how the same would be true at 595,000 tpa for the incinerator and 170,000 tpa pulp. Furthermore, the Environment Agency refused the permit application for the Rivenhall site in December 2016 primarily because of the failure by the applicant to demonstrate BAT for the incinerator/CHP unit. ECC should demonstrate why this change is minor in stating that There will be no significant sustainability effects, or changes to the SA, as a result of this modification.</p>	
<b>Unrelated</b>			
1064243, Historic England, 531	Unrelated	Sustainability Appraisal and Strategic Environmental Addendum- We have no comments to make on the modifications to this document.	

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# Essex and Southend-on-Sea Replacement Waste Local Plan

## **Modifications Consultation: Comments of the Waste Planning Authorities**

March 2017

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## **Introduction**

This report aims to draw together the key points made through the public consultation on modifications to the Essex and Southend on-Sea Waste Local Plan.

The consultation took place over 6 weeks, closing on Thursday 16 February. In total 372 consultees submitted 553 responses.

The report includes the commentary of the Waste Planning Authorities (WPAs) as an aid to the examination process, to clarify issues raised, present updated information and confirm the position of the Authorities.

This document was submitted to the Inspector on Monday 20 March 2017.

## Main Modifications

Modification Number	Modification Summary	Response
<b>M1 – ‘Waste Challenge at a Glance’</b>	<p>See 'Appendix 1 - The Waste Challenge at a Glance' in MC1 – Schedule of Modifications.</p> <ul style="list-style-type: none"> <li>Update of figures used in ‘The Waste Challenge –At a Glance’ section to take into account further information arising from the consultation, the Hearings and the addition of L(i)16- Dollyman’s Farm.</li> </ul>	<p>A number of comments seek to understand the need for the importation of waste from London. This matter was dealt with during the hearing sessions where the waste data evidence was explored in detail. The comments received do not offer any alternative data or appropriate strategy and therefore the Authorities continue to support the modifications proposed through M1.</p> <p>A number of the comments made in relation to M1 also relate to the allocation of Rivenhall through the WLP. The modifications proposed in relation to this site (see M19) aim to update the Submission Plan in line with the current planning permission (granted in February 2016). The Authorities continue to support the allocation of this site and waste development in this location. It is noted that the Environment Agency refused to issue a Waste Management Permit (December 2016) as the applicant had not demonstrated Best Available Techniques, specifically in relation to the height of the chimney stack. In February 2017 the applicant submitted a new application for an Environmental Permit to the Environment Agency which proposes a taller stack. The applicant has confirmed publically an intention to submit a new planning application for this stack. Given the extant planning permission, it would be remiss for the Plan to not support this site.</p> <p>Comments received in relation to need for inert waste management capacity and the requests for allocation of the Hastingwood site are addressed by the Authorities under M5.</p>



Modification Number	Modification Summary	Response
<b>M2 – Paragraph 5.3</b>	The principle of net self-sufficiency does not apply to <u>hazardous waste or</u> radioactive waste as it is not considered practical to provide for such specialist facilities <u>on the basis of net self-sufficiency</u> within the Plan area.	Hazardous and radioactive wastes have been excluded from the overarching RWLP goal of net self-sufficiency in recognition of the fact that the quantities of waste from these streams are small. Any potential new hazardous or radioactive waste management facility would be subject to economies of scale such that the amount of waste generated in the Plan area in isolation would be insufficient to support a facility. It is considered therefore that for these waste streams, net self-sufficiency is not practicable.
<b>M3 – Policy 1 ‘Need for Waste Management Facilities’</b>	See ‘Appendix 2 – Policy 1’ in MC1 Schedule of Modifications. <ul style="list-style-type: none"> <li>• Clause a – update of shortfall capacity figure for biological treatment for non-hazardous organic waste</li> <li>• Clause b – update of shortfall capacity figure for inert waste</li> <li>• Clause c – update of term ‘other waste’ to be clearer</li> </ul>	Comments from parish councils and residents object to the modification to replace the term ‘other waste’ with ‘non-hazardous residual waste’, stating that the proposed amendment should instead state that this waste is the SRF/RDF originating from Tovi Eco Park which will be sent to Rivenhall IWMF.  The Authorities maintain that the term used in the modification (non-hazardous residual waste) is accurate. Policy 1 seeks to confirm the amount of each waste type to be managed by the plan, and should not seek to identify the origin or destination of the waste, as this is covered in other parts of the Plan.
<b>M4 – Policy 2 ‘Safeguarding Waste Management Sites and Infrastructure’</b>	See ‘Appendix 3 – Supporting Text and Policy 2’ in MC1 Schedule of Modifications <ul style="list-style-type: none"> <li>• Update to reflect consultation distance in respect of WTC, from 200m to 400m</li> <li>• Update to paragraph 6.10 and a new paragraph 6.11 to clarify operation of safeguarding policy</li> <li>• Update to the policy which act to set out the stance the WPA is likely to take to</li> </ul>	One comment was received for this modification. This was from Anglian Water and was in support of the proposed modification. This response did however confirm that the reference should be to WRC- (Water Recycling Centres), rather than WTC (Water Treatment Centres).

Modification Number	Modification Summary	Response
	applications within safeguarded areas.	
<b>M5 – Policy 3 ‘Strategic Site Allocations’</b>	<p>See ‘Appendix 4 – Policy 3’ in MC1 Schedule of Modifications.</p> <ul style="list-style-type: none"> <li>• Clause 1 – name change of Basildon Waste Water Treatment Works.</li> <li>• Clause 2 – removal of Wivenhoe Quarry allocation, with the facility proposed in the Wivenhoe locality moved to the Sunnymead, Elmstead and Heath Farms allocation.</li> <li>• Clause 3 update to clarify what is meant by ‘other waste’ management.</li> <li>• Clause 4 – inclusion of a new inert recycling allocation at Dollymans Farm, Basildon.</li> <li>• Removal of the words “as follows and”.</li> </ul>	<p><b>IWMF 2 Rivenhall</b></p> <p>A number of the comments made in relation to M1 also relate to the allocation of Rivenhall through the WLP. The modifications proposed in relation to this site (see M19) aim to update the Submission Plan in line with the current planning permission. This updated planning permission was granted in February 2016, at a time when it was too late to accommodate this revision into the Pre-Submission Plan as the governance processes of both Councils had already commenced.</p> <p>The comments received against this modification maintain that the allocation of Rivenhall IWMF is not legally compliant because it would result in LACW being transported to a facility which is privately owned.</p> <p>The Authorities continue to support the allocation of this site, and waste development in this location as a result. It is noted that the Environment Agency refused to issue a Waste Management Permit (December 2016) as the applicant had not demonstrated Best Available Techniques, specifically in relation to the height of the chimney stack. In February 2017 the applicant submitted a new application for an Environmental Permit to the Environment Agency which proposes a taller stack. The applicant has confirmed publically an intention to submit a new planning application for this stack. Any arrangement between the Rivenhall IWMF and ECC regarding residual non-hazardous waste would be subject to competitive tender and contractual agreements which have yet to commence.</p>

Modification Number	Modification Summary	Response
		<p>A number of comments correctly identify an error in Map 5 (in the Submission Plan <a href="#">CD-1</a>), which shows Rivenhall to be allocated for 'Biological Waste Treatment' only. Although not part of the modifications schedule, this is considered to be a minor issue which will be addressed in finalising the Plan. The policy and Development Principles correctly identify this site as managing residual non-hazardous waste <i>and</i> biological waste.</p> <p><b>Hastingwood</b></p> <p>Comments in relation to the need for all Green Belt sites to be reassessed relate specifically to a previously considered site 'Hastingwood' and have been submitted by the landowner's agent.</p> <p>Hastingwood was discussed during the hearing sessions, when the Inspector asked the Authorities whether such a reassessment was necessary during discussions relating to Dollymans Farm. The Authorities concluded that such reassessment was not necessary. Hastingwood is located in the green belt and continues to be supported by the operator as a suitable location for inert waste recycling. As of January 2017, a section of this site benefits from a Certificate of Lawful Use for Existing Development (<a href="#">ESS/39/16/EPF</a>). Given the preliminary comments from the Inspector during the hearing session regarding the suitability of waste operations in the green belt, the Authorities do not expect the remainder of this site to be included in the Plan. Unlike the inert landfill allocation at Dollymans Farm, the Hastingwood inert waste recycling proposal would amount to</p>

Modification Number	Modification Summary	Response
		<p>a permanent industrial use in the Green Belt. Conversely, the Dollymans Farm proposal would amount to a temporary working where long term aims are to return the existing site to its original ground levels.</p> <p>A number of comments request a further modification to Policy 3 to require that all sites allocated through the policy outline their compliance with Policy 10- Development Management Criteria. The Authorities do not support the need for such an additional modification, as the policies are to be read as a whole and cross referencing between policies is kept to a minimum as a result.</p>
<p><b>M6 – Paragraph 8.10</b></p>	<p>Proposals within the Areas of Search will normally require express planning permission and will be considered against <u>other relevant</u> policies in the RWLP, <u>including Policy 10 – Development Management</u>, and the wider Development Plan as a whole. <u>The need to consider the wider Development Plan is important as it is the relevant Local Plan which determines whether an Area of Search designation remains relevant. Should a Local Plan seek to re-allocate land pertaining to an Area of Search away from B2/B8 uses, the criteria upon which Areas of Search are based would no longer be fulfilled. In such instances, the location would cease to be an Area of Search and Policy 4 would no longer apply.</u> The design and operation of waste management facilities proposed within Areas of Search should be <b>consistent</b> <u>compatible</u></p>	<p>Two comments were received in relation to this modification to supporting text. One of these was from Basildon Borough Council supporting the modification. The other comment was from a landowner concerned about the introduction of ambiguity around the applicability of the Policy 4- Area of Search. The aim of the modification is in fact to add clarity regarding the implementation of the policy. The availability and suitability of the Areas of Search may change throughout the Plan period as a result of new spatial plans and planning permissions. The modification aims to explain the live nature of land use decisions and how this will be used to inform waste planning decisions where necessary. The Authorities therefore do not consider it necessary to modify the supporting text beyond that which is currently proposed.</p>

Modification Number	Modification Summary	Response
	with existing uses in the employment area.	
<b>M7 – Policy 4 'Areas of Search'</b>	<p>See 'Appendix 5 – Policy 4' in MC1 Schedule of Modifications.</p> <ul style="list-style-type: none"> <li>• Revised policy to include supporting text in order to aid clarity around the purpose of Areas of Search.</li> <li>• Removal of Oakwood and Crusader Business Park, Tendring.</li> </ul>	One comment was received for this modification, from Basildon Borough Council, in support of the proposed modification.
<b>M8 – Policy 5 'Enclosed Waste Facilities on Unallocated Sites or Outside Areas of Search'</b>	<p>See 'Appendix 7 – Policy 5' in MC1 Schedule of Modifications.</p> <ul style="list-style-type: none"> <li>• Title change to better reflect that the policy applies to enclosed facility proposals on unallocated sites.</li> <li>• Clause 1 – replacement of “or” with “and” and deletion of “and” from “and/or”.</li> <li>• Clause 2 – the addition of “although not exclusively” in relation to waste arising in the Plan Area.</li> <li>• Addition of a final sentence to state that proposals not according with the Policy will be assessed on their merits.</li> </ul>	<p>Comments received in relation to the allocation of Rivenhall IWMF indicate that the allocation does not comply with the clauses within Policy 5.</p> <p>The site benefits from planning permission as of February 2016 and it would therefore be remiss of the emerging WLP not to include it.</p>
<b>M9 – Policy 6 'Open Waste Facilities on Unallocated Sites or Outside Areas of Search'</b>	<p>See 'Appendix 8 – Policy 6' in MC1 Schedule of Modifications.</p> <ul style="list-style-type: none"> <li>• Title change to better reflect that the policy applies to open facility proposals on unallocated sites.</li> <li>• Clause 1 – replacement of “or” with “and”</li> </ul>	No comments were received for this modification.

Modification Number	Modification Summary	Response
	<p>and deletion of “and” from “and/or”.</p> <ul style="list-style-type: none"> <li>• Clause 2 – the addition of “although not exclusively” in relation to waste arising in the Plan Area.</li> <li>• Addition of a final sentence to state that proposals not according with the Policy will be assessed on their merits.</li> </ul>	
<b>M10 – Policy 7 ‘Radioactive Waste Management at Bradwell-on-Sea’</b>	<p>See ‘Appendix 8 – Supporting Text and Policy 7’ in MC1 Schedule of Modifications.</p> <ul style="list-style-type: none"> <li>• Title change to clarify that the policy deals with all radioactive waste and not just nuclear waste.</li> <li>• First paragraph – addition of word “management” in place of “treatment and/or storage” and addition of “supported” in place of “only be acceptable”</li> <li>• Clause b – addition of “radioactive” and “at this location” in place of “decommissioned nuclear” and “site” respectively.</li> </ul>	<p>One comment was received for this modification, from Nuclear Decommissioning Authority and Magnox Limited, in support of the changes proposed.</p>
<b>M11 – Policy 9 ‘Waste Disposal Facilities on Unallocated Sites’</b>	<p>See ‘Appendix 10 – Policy 9’ in MC1 Schedule of Modifications.</p> <ul style="list-style-type: none"> <li>• Title change to better reflect that the policy applies to new disposal facilities on unallocated sites.</li> <li>• Clause 1 – replacement of “or” with “and”, and deletion of “and” from “and/or”</li> <li>• Clause 2 – the addition of “although not exclusively” in relation to waste arising in</li> </ul>	<p>No comments were received for this modification.</p>

Modification Number	Modification Summary	Response
	<p>the Plan Area</p> <ul style="list-style-type: none"> <li>• Addition of final sentence to state that proposals not according with the Policy will be assessed on their merits</li> </ul>	
<p><b>M12 – Paragraph 9.33</b></p>	<p>The Public Rights of Way (PROW) network provides an important means of accessing the countryside. Where <u>relevant, applications for waste management</u> will be required to ensure that PROW remain usable at all times or provide satisfactory alternative routes. Alternative paths and any necessary diversions of existing paths will be required to be in place prior to the closure of the existing PROW. <u>Restoration schemes should, in the first instance, be seen as an opportunity to enhance and upgrade PROW where possible, especially with regard to the provision of Bridleways as multi-user paths as part of any permission granted. In all cases, restoration schemes should provide for access which is at least as good as that existing before workings began.</u> <del>and the</del> <u>The</u> closure of a PROW, where no alternative route is provided, will not normally be acceptable.</p>	<p>Two comments were received for this modification, from Basildon Borough Council and Natural England. Both responses were in support of the proposed modification.</p>
<p><b>M13 – Policy 10 ‘Development Management Criteria’</b></p>	<p>See ‘Appendix 11 – Policy 10’ in MC1 Schedule of Modifications.</p> <ul style="list-style-type: none"> <li>• More detail provided around clause b (protection of water resources).</li> <li>• Addition of final sentence setting out that enhancement opportunities should be</li> </ul>	<p>Two comments were received in support of the proposed modification from Basildon Borough Council and Historic England.</p> <p>The Authorities welcome the formatting change proposed by Natural England to ensure that the distinction between water quality and quantity is accurately expressed, and would support</p>

Modification Number	Modification Summary	Response
	sought.	<p>the following further amendment:</p> <p><i>b. water resources, with particular regard to:</i></p> <ul style="list-style-type: none"> <li>- <i>the quality of water within water bodies:</i> <ul style="list-style-type: none"> <li>o <i>preventing the deterioration of their existing status;</i></li> <li>or</li> <li>o <i>failure to achieve the objective of good status, and</i></li> </ul> </li> <li>- <i>the quantity of water for resource purposes within water bodies</i></li> </ul>
<b>M14 – Policy 12 ‘Transport and Access’</b>	<p>See ‘Appendix 12 – Policy 12’ in MC1 Schedule of Modifications.</p> <ul style="list-style-type: none"> <li>• Inclusion of clause d to set out a further tier in the hierarchy of preference for transportation.</li> </ul>	<p>Comments from Historic England indicate concern regarding the impact of transport/access associated with waste development on the historic environment. There was a desire for the Historic Environment to be recognised in clause d.</p> <p>The Authorities believe the proposed amendment suggested by HE could serve to overly emphasise the importance of the historic environment above other sensitive receptors. The Historic Environment is adequately protected by other policies in the Plan and impacts would not be judged solely on this policy.</p>
<b>M15 – Bellhouse Landfill Site</b>	<p>Indicative Facility Scale:</p> <p>75,000tpa – Biological Treatment Facility</p> <p><del>3,00,000m<sup>3</sup></del> <b>250,000tpa</b> – inert landfill</p> <p>Estimated Availability: <b>Upon adoption (2017)</b> <b>Between: up to 5-10 years from adoption</b></p>	No comments were received for this modification.
<b>M16 – Little Bullocks and Crumps Farm, Great and Little</b>	See ‘Appendix 14 – Table 11 Little Bullocks and Crumps Farm, Great and Little Canfield’ in MC1 schedule of modifications	The comments received from three local Parish Councils, reiterating their comments made through the Pre Submission consultation, were addressed by the Inspector during the examination hearing sessions. The Parish Councils continue to



Modification Number	Modification Summary	Response
<b>Canfield</b>	<ul style="list-style-type: none"> <li>• Site 1 Area and Boundary amended to be consistent with MLP</li> <li>• Estimated Availability for site 3 updated</li> <li>• Life of Site 2 updated</li> <li>• Life of Site 3 updated</li> <li>• Site 2 – removal of bullet point 1</li> </ul>	<p>object to the allocation of the sites in this location and consequently the modifications proposed.</p> <p>The modifications are necessary to ensure the Plan is sound; there has been no change to the circumstances of the site as discussed during the hearing sessions in September and the Authorities continue to support the modifications as included.</p>
<b>M17 – Morses Lane, Brightlingsea</b>	<p>See ‘Appendix 15 – Table 14 Morses Lane, Brightlingsea’ in MC1 Schedule of Modifications.</p> <ul style="list-style-type: none"> <li>• The inclusion of a statement that the facility would be enclosed (bullet point 5).</li> <li>• Additional bullet point regarding the need for new development to not impact on the nearby retail use (bullet point 6).</li> </ul> <p>Morses Lane Site Assessment Scores:</p> <ul style="list-style-type: none"> <li>• ‘3D – Proximity to Sensitive Receptors’ – Red.</li> <li>• ‘3K – Recreation Facilities’ – Amber 2.</li> </ul> <p>See MC2 Site Assessment Methodology Report for the site assessment proforma and rationale for allocation.</p>	<p>A number of representations made by local residents continue to reiterate previous concerns regarding Morses Lane, Brightlingsea. These include questioning the suitability of the B1029; given that a recent traffic survey indicated that 12,000 vehicles travelled in and out of Brightlingsea within one day. However, the B1029 is deemed suitable to accommodate HGV traffic by the Highways Authority as it is part of the County’s main road network.</p> <p>Representations also reiterated concerns regarding odour and impacts on local house prices. Due to the inert nature of the waste proposed to be managed at Morses Lane, odour is not likely to be an issue. House prices are not a material planning consideration and therefore are not addressed by the Authorities in preparing the Waste Local Plan.</p> <p>The proposed modifications to the Development Principles associated with the Morses Lane site allocation include the expectation for operations to be enclosed within an appropriate building. The comments received indicate that this does not address the proximity to sensitive receptors, notably the adjacent retail unit, secondary school and college- with respondents concerned that the enclosure may result in an increase in noise</p>

Modification Number	Modification Summary	Response
		<p>and dust. However, these matters were discussed as part of the examination hearings and the Authorities maintain that such a structure would serve to mitigate such issues.</p> <p>A number of comments reiterated the suggestion that the operation should take place at an alternate location (the Veolia site, off the A120). This is not a feasible option, as this site is an existing waste transfer station which was not proposed as part of the call for sites process and therefore not considered by the Authorities.</p> <p>Proximity to the SPA has been considered through both the Site Assessment and HRA, leading to the existing Development Principles for Moses Lane, Brightlingsea. These Principles are supported by Natural England.</p> <p>Comments suggest that the capacity of the site is unlikely to be delivered and therefore the site should not be allocated- due to the operators comments that capacity would be split between this allocation and another of their operational sites. The authorities maintain the site is capable of delivering the identified capacity and this has been supported by the operator. The planning application will reveal detailed capacity capabilities and should additional capacity still be required, this will be quantified through the monitoring of the Plan and can inform any future Plan reviews.</p> <p>Due to the modifications proposed to Policy 12 – Transport and Access, and the development principles for Moses Lane, Brightlingsea; Tendring District Council no longer objects to the</p>

Modification Number	Modification Summary	Response
		<p>site allocation.</p> <p>A number of further amendments to the Development Principles associated with the Morses Lane site allocation have been suggested by the East of England Co-operative Society. However, these are beyond the scope of the WLP and would be better suited as requirements of a planning application or conditions of planning permission. During the hearing sessions, a number of amendments to the site assessment scoring were suggested, and these have been incorporated as outlined in MC2 – Site Assessment and Addendum. Due to these being factual updates, no further commentary has been required.</p>
<p><b>M18 – Newport Quarry</b></p>	<p>See ‘Appendix 16 – Table 15 Newport Quarry’ in MC1 Schedule of Modifications</p> <ul style="list-style-type: none"> <li>• Update to the expected form of restoration (bullet point 1)</li> <li>• Update to environmental and landscape considerations (bullet point 2)</li> <li>• Update to routeing agreement (bullet point 6)</li> </ul>	<p>Comments from the two local Parish Councils and Natural England support the modifications.</p> <p>The site operator suggests that the reference to “visual impacts” from the first line of the second bullet point should be removed, as these weren’t a concern to residents. The Authorities do not support the removal of this reference as it seeks to establish the position of the Planning Authority in relation to restoration process and final form.</p>
<p><b>M19 - Rivenhall</b></p>	<p>Indicative Facility Scale:</p> <p>AD <del>85,000tpa</del> <u>30,000tpa</u></p> <p>CHP <del>360,000tpa</del> <u>595,000tpa</u></p>	<p>The modifications proposed in relation to this site aim to update the Submission Plan in line with the current planning permission (granted in February 2016). The Authorities continue to support the allocation of this site and waste development in this location as a result. It is noted that the Environment Agency refused to issue a Waste Management Permit (December 2016) as the applicant had not demonstrated Best Available Techniques, specifically in relation to the height of the chimney stack. In February 2017 the applicant submitted a new application for an</p>

Modification Number	Modification Summary	Response
		Environmental Permit to the Environment Agency which proposes a taller stack. The applicant has confirmed publically an intention to submit a new planning application for this stack.
<b>M20 - Sandon</b>	Indicative Facility Scale: <del>40,000tpa</del> <b>300,000tpa</b> Inert Waste Recycling Capacity	One comment was received for this modification, from Basildon Borough Council, in support of the proposed modification.
<b>M21 – Sunnymead, Elmstead and Heath Farms</b>	<p>See ‘Appendix 17 – Table 19 Sunnymead, Elmstead and Heath Farms’ in MC1 Schedule of Modifications.</p> <p>Inclusion of recycling operations (new allocation W36) originally allocated at Wivenhoe Quarry (W13). The two operations (L(i)5 and W36) proposed at Sunnymead, Elmstead and Heath Farms are now included within a single table.</p> <ul style="list-style-type: none"> <li>• Update ‘Site Allocation For’</li> <li>• Update ‘Estimated Availability’</li> <li>• Update ‘Life’</li> </ul> <p>New development principles included to reflect the outcome of the assessment process.</p> <p>See MC2 Site Assessment and Methodology Report Addendum for the site assessment proforma and rationale for allocation.</p>	<p>A number of comments from local residents and parish councils object to the proposed modification to include the allocation of the inert waste recycling (Site 2) as part of the wider inert waste disposal site allocation (Site 1).</p> <p>Comments raise concerns specifically regarding the impacts of the recycling operations (site 2) on residential amenity, including proximity to housing, noise, dust, pollution, visual and other environmental impacts.</p> <p>The issues raised have been assessed through the site assessment methodology, with the proforma for both Site 1 and Site 2 considering the potential impacts using the RAG scoring system. The results of this scoring process have not revealed issues which could not be addressed through some form of mitigation. The result of the assessment process has informed the Development Principles for this site. The Development Principles outline specific issues and possible mitigation to be implemented by any future planning permission.</p> <p>Access to the site as a whole is a significant concern identified by respondents. A comment submitted by the operator indicates a desire to create a new access directly into Site 2 along the</p>

Modification Number	Modification Summary	Response
		<p>B1027. The Plan, as modified, supports continued use of the existing access for both Site 1 and 2. This access is also supported by the Mineral Local Plan (2014), where the site is allocated for the extraction of minerals. The case for a new access has not been considered in detail by the Authorities at this late stage of Plan preparation, and although there is no in principle objection based on the information available at this point, this requires detailed consideration more appropriate for a planning application.</p>
<p><b>M22 – Wivenhoe Quarry Plant Area</b></p>	<p>Removal of the site allocation to reflect that the facility is now included as part of Sunnymead, Elmstead and Heath Farms.</p>	<p>No comments were received for this modification.</p>
<p><b>M23 – Dollymans Farm</b></p>	<p>Allocation of site.</p> <p>See ‘Appendix 18 – Table xx Dollymans Farm’ in MC1 Schedule of Modifications for development principles and MC2 Site Assessment and Methodology Report Addendum for the site assessment proforma and rationale for allocation</p>	<p>A large number of comments from parish councils, local residents, businesses and organisations object to the allocation of Dollyman’s Farm for inert waste landfill. The reasons for objection include: the green belt status of the site, concerns about impacts on public accessibility, pollution risks- particularly to the local streams and onwards to the River Crouch, and traffic impacts.</p> <p>The site falls within two district council areas. Comments in relation to the use of the site for formal flood attenuation/storage purposes are noted but this scheme is not supported by the Lead Local Flood Authority and therefore such a scheme is not currently being progressed.</p> <p>Both district councils suggest that vehicles associated with the development should be restricted to accessing the site from the west, due to the highway capacity issues in Shotgate and</p>

Modification Number	Modification Summary	Response
		<p>Wickford. Any decision to control access to the site must be based on evidence, which would become available through a transport assessment as requested in the development principles. Therefore the Authorities do not consider it appropriate to support the suggestion to restrict access at this stage, and this matter would be addressed through the planning application process.</p> <p>Pollution issues are understood to be addressed in detail through any future planning application and the EA environmental permitting processes as necessary.</p> <p>Natural England has indicated that a HRA is required to support allocation and restoration approaches should fit with the Northern Thames Basin National Character Area. The Authorities have completed the HRA, and engaged in further discussion with Natural England regarding the conclusions and implications for the site allocation. The agreed conclusions support the allocation of the site subject to amendments to the Development Principles to cover.</p> <p>The Authorities have carefully considered the concerns raised through the consultation and would support amended Development Principles to address the issues raised. <b>See Appendix A of this report.</b></p>
<b>M24 – Table 21 Development in Waste Consultation</b>	See ‘Appendix 19 – Table 21 Development in Waste Consultation Area’ in MC1 Schedule of Modifications.	One comment was received for this modification, from Basildon Borough Council, in support of the proposed modification.

Modification Number	Modification Summary	Response
<b>Areas</b>	<p>It is proposed to amend the safeguarding table to reduce the range of change of use applications to be included within the scope of Policy 2 to change of use away from B2/B8 uses and changes away from any use class to Category A and Category C uses only.</p> <p>Reference to safeguarding also applying to temporary applications for development already scoped in has been removed from the table and inserted into paragraph C2 (this is addressed in main 25).</p>	
<b>M25 – Table 21 Development in Waste Consultation Areas</b>	<p>However, it's neither practicable nor necessary for consultation to occur on all developments proposed through planning applications. The table below sets the development proposed to be subject to consultation with the Waste Planning Authorities <b><u>the development types below include those relating to temporary structures and uses:</u></b></p>	No comments were received for this modification.
<b>M26 – Oakwood and Crusader Business Park</b>	Removal of Map as the site is no longer being considered as an Area of Search.	One comment was received for this modification, from Tendring District Council, in support of the proposed modification.

## Minor Modifications

Where no comment has been made against a proposed modification, the summary of that modification has not been included.

These can be found within [MC1 Schedule of Modifications](#).

Modification Number	Modification Summary	Response
<b>M27 – Paragraph 4.11</b>	<p><b>Low Level Radioactive Waste</b></p> <p>Radioactive wastes are categorised into nuclear and non-nuclear wastes. Nuclear waste are from the nuclear power industry while “non-nuclear” wastes are generally from medical facilities and educational establishments.</p>	It is not considered necessary to incorporate the changes suggested by Cumbria County Council in this regard due to clarity provided in paragraph 4.7 that the waste streams described in paragraphs 4.8 to 4.13 are within the Plan area.
<b>M28 – Paragraph 4.12</b>	<p><b>Wastewater (sewage)</b></p> <p>Comprises liquid <b>and solid</b> waste discharged by domestic residences, commercial properties, industry and agricultural activities, <b><u>which is then carried to Water Recycling Centres via a network of foul sewers.</u></b></p>	One comment was received for this modification, from Anglian Water, in support of the proposed modification.
<b>M29 – Paragraph 4.16</b>	See MC1 Schedule of Modifications.	No comments were received for this modification.
<b>M30 – Paragraph 4.24</b>	Bradwell Nuclear Power Station is a licensed Nuclear Site and is the principal source of radioactive waste arisings within the Plan area whilst the Power Station is decommissioned. At present, there is sufficient <b><u>national LLW disposal capacity and sufficient local ILW interim storage</u></b> capacity for decommissioning process.	Comments from Magnox/NDA indicate their support for further modifications beyond those supported through this minor modification. Given the minor nature of these additional amendments, the Authorities confirm that they will be incorporated into the final draft of the Plan to be adopted. These further minor modifications are set out in Comment ID 354.
<b>M31- Paragraph</b>	Currently, wastewater treatment across Essex and	One comment was received for this modification, from Basildon



Modification Number	Modification Summary	Response
4.25	<p>Southend-on-Sea is provided via a total of 153 <u>Water Recycling Centres (WRC) Wastewater Treatment Works (WWTW)</u>;</p> <p>The vast majority of <u>WRCs WWTWs</u> have capacity to accept wastewater from <del>the</del> proposed growth <u>in the Plan Area</u> without the need for improvements to existing facilities;</p> <p>Sludge generated in the <u>WRC WWTW</u> can be sent for further treatment for use as agricultural fertiliser or power generation. The sludge treatment strategies provided by operators, indicate that there is adequate capacity for sludge treatment and disposal during the Plan period.</p>	Borough Council, in support of the proposed modification.
M32 – Paragraph 4.26	See MC1 Schedule of Modifications.	No comments were received for this modification.
M33 – Paragraph 5.2	<p>The Plan is based on the principle of net self-sufficiency, where practicable. This means having sufficient waste transfer, recycling, recovery, and disposal capacity within the Plan area to manage the amount of waste generated, with only limited cross border movements with other authorities. Such an approach recognises that waste travels across administrative boundaries, <b>particularly when the source of the waste is located close to an administrative border</b> <u>with the distance travelled being, at least in part, related to the volume of waste required to make a facility</u></p>	<p>A single comment from a member of the public raises objection to this modification, raising concerns that that commercial viability outweighs the benefit of net self-sufficiency.</p> <p>The Authorities continue to support this minor modification as it is useful context. It recognises that net self-sufficiency is unlikely to be achieved if privately funded development would be economically unviable.</p>

Modification Number	Modification Summary	Response
	<p><u>economically viable set against the amount of waste expected to arise in a given area. The smaller the quantity of a waste type generated, the less practical it is to be net self-sufficient due to economies of scale making small, purely local facilities unviable. Particularly specialist types of waste travel beyond one or more administrative boundaries.</u></p>	
<p><b>M34 – Paragraph 6.6</b></p>	<p>See MC1 Schedule of Modifications.</p>	<p>No comments were received for this modification.</p>
<p><b>M35 – Paragraph 7.1</b></p>	<p>This chapter sets out the policy for locating <del>the range</del> waste management facilities required <u>to manage waste</u> in the Plan Area to 2032. <del>The Plan meets the identified need for new capacity, set in the waste management capacity gap, by allocating strategic sites.</del> <u>Although it is recognised that capacity gaps remain in all waste streams other than for biological treatment, it is considered that all suitable sites submitted to the Waste Planning Authorities have been allocated.</u></p>	<p>Comments on the allocation of sites for inert waste management and the inclusion of the Hastingwood site are addressed by the Authorities under M5 above.</p>
<p><b>M36 – Paragraph 7.2</b></p>	<p><del>The Strategic site allocations meet the identified need for</del> <u>have been made to manage the following waste streams in the Plan Area:</u></p> <ul style="list-style-type: none"> <li>• biological waste;</li> <li>• inert waste recycling;</li> <li>• Other waste management;</li> <li>• non-hazardous residual waste;</li> </ul>	<p>Comments from parish councils and residents object to the modification to remove the term ‘other waste’, stating that the proposed amendment should instead state that this waste is the SRF/RDF originating from Tovi Eco Park which will be sent to Rivenhall IWMF.</p> <p>The Authorities maintain that the term used in the modification (non-hazardous residual waste) is accurate. Policy 1 seeks to</p>

Modification Number	Modification Summary	Response
	<ul style="list-style-type: none"> <li>Inert landfill;</li> <li>hazardous waste.</li> </ul>	confirm that the amount of each waste type to be managed by the plan, and should not seek to identify the origin or destination of the waste, as this is covered in other parts of the Plan.
<b>M37 – Paragraph 8.7</b>	See MC1 Schedule of Modifications.	No comments were received for this modification.
<b>M38 – Paragraph 8.15</b>	See MC1 Schedule of Modifications.	No comments were received for this modification.
<b>M39 – Paragraph 8.23 and 8.26</b>	<p>See ‘Appendix 9 – Supporting Text and Policy 7’ in MC1 Schedule of Modifications.</p> <ul style="list-style-type: none"> <li>Update to reflect the publication of NDA Strategy III in March 2016</li> </ul>	The WPAs would welcome an amendment to update the relevant paragraphs using the wording suggested by the NDA and Magnox as they represent matters of fact.
<b>M40 – Paragraph 8.32</b>	<p><b><u>Most disposal of LLW requires permits to be held by both the waste producer that consigns the waste and the operator of the waste management facility that receives it. Some LLW may go to landfills permitted by the Environment Agency to accept LLW for disposal, some to the national Low Level Waste Repository (LLWR) near Drigg in Cumbria, some to decontamination or recycling facilities in the UK or abroad and some to incineration facilities. Only radioactive waste from the lower spectrum of LLW can be sent to permitted landfill. The LLWR site, which generally receives waste higher in the LLW spectrum, is part of the NDA’s estate and as such it is</u></b></p>	One comment was received for this modification, from the Nuclear Decommissioning Authority and Magnox Limited, in support of the proposed modification.

Modification Number	Modification Summary	Response
	<p><u>covered by both the UK LLW Strategy 2016 and the NDA's own Strategy (as referred to above). Operators within the NDA estate such as Magnox have diverted more than 85% of LLW away from the LLWR through a wide range of more environmentally sustainable options such as waste prevention, re-use and recycling.</u> In contrast to VLLW, most disposal of LLW requires a permit to be held by both the waste producer and the operator of the waste management facility that receives it. LLW can go to a landfill permitted by the Environment Agency to accept LLW for disposal, storage at the national Low Level Waste Repository (LLWR) near Drigg in Cumbria, or may be dealt with by incineration (with or without energy recovery). Only radioactive waste from the lower spectrum of LLW can be sent to permitted landfill (ie up to 200 Becquerels per gram of activity concentration). Currently, the use of the national LLWR is the conventional management route, although it has limited capacity. The site is part of the NDAs estate and as such it is covered by both the UK LLW Strategy 2010 and the NDA's own Strategy (as referred to above). For example, the NDA has diverted more than 85% of LLW away from the LLWR through a wide range of more environmentally sustainable options such as waste prevention, re-use and recycling. LLW</p>	

Modification Number	Modification Summary	Response
	<del>disposal, except for that to the national LLWR, usually takes place at facilities used for the management of other types of waste, subject to regulatory permits.</del>	
<b>M41 – Paragraph 9.21</b>	See MC1 Schedule of Modifications.	No comments were received for this modification.
<b>M42 – Paragraph 9.23</b>	The impact on human health is <b>therefore also</b> a material consideration in making planning decisions. However, national policy expects that in determining applications, Waste Planning Authorities should not be concerned with “the control of processes which are a matter for the pollution control authorities. Waste Planning Authorities should work on the assumption that the relevant pollution control regime will be properly applied and enforced.” If <b>permission is</b> granted, planning conditions may be imposed <del>on a</del> <b>planning permission</b> to <b>help</b> mitigate any impact on local amenity.	It appears there may have been some confusion in the representations received between main/minor modifications to the RWLP and ‘material changes’ in planning terms.  Modifications relating to Rivenhall have been addressed by M19.  However, whilst allocations within the RWLP constitute an ‘in principle’ support for development, all sites must still gain planning permission, where matters material to the decision making process, as outlined in paragraph 9.23, will be considered.
<b>M43 – Paragraph 9.44</b>	See MC1 Schedule of Modifications.	No comments were received for this modification.
<b>M44 – Table 6 Monitoring Framework</b>	See MC1 Schedule of Modifications.	No comments were received for this modification.
<b>M45 – Basildon Waste Recycling Centre</b>	See MC1 Schedule of Modifications.	No comments were received for this modification.

Modification Number	Modification Summary	Response
<b>M46 – Rivenhall</b>	Site Allocation For: Biological and <del>Other</del> <b>Non-Hazardous Residual</b> Waste Management Capacity	See response to M19
<b>M47 – Little Bullocks and Crumps Farm, Great and Little Canfield and Newport Quarry</b>	See MC1 Schedule of Modifications.	No comments were received for this modification.
<b>M48 – Festival Business Park, Basildon</b>	See ‘Appendix 20 – Festival Business Park, Basildon’ in MC1 Schedule of Modifications.  Update Map to reflect that used in the Areas of Search Methodology Report	Two comments were received for this modification, one in support of the proposed modification from Basildon Borough Council, and confirmation from C A Telecom of utility service apparatus within the proposed Area of Search.
<b>M49 – Land off Axial Way, Myland, Colchester</b>	See ‘Appendix 21 – Land off Axial Way, Colchester’ in MC1 Schedule of Modifications  Boundary updated	The land between the stadium and the proposed Area of Search was removed to take into account a recent outline planning permission, 0/COL/01/1622, for a high-quality leisure-led mixed development in the area. Following discussions with Colchester Borough Council under the Duty to Co-operate, it was agreed to remove land from the Area of Search which was associated with this permission due to the nature of the proposed development. It is therefore not considered appropriate to re-allocate it at this stage.
<b>M50 – Tollgate, Stanway, Colchester</b>	See ‘Appendix 22 – Tollgate, Stanway, Colchester’ in MC1 Schedule of Modifications  Boundary updated	Land was removed from the originally proposed Area of Search designation in conformity with the constraints methodology, in recognition of an extant residential planning permission which was previously unknown to the authorities (Colchester planning reference 145494). It is not considered appropriate to re-

Modification Number	Modification Summary	Response
		introduce land which was removed in conformity with the methodology.
<b>M51 – Langston Road/Oakwood Hill, Loughton, Epping Forest</b>	See 'Appendix 23 – Langston Road/Oakwood Hill, Loughton, Epping Forest'  Boundary updated	The error in the title of the Map 43 is noted by the WPAs. The WPAs would support an amendment to update this to the correct title of ' <i>Langston Road/Oakwood Hill</i> '. The Langston Road /Oakwood Hill Area of Search boundary was amended to take into account the granting of permission EPF/0294/15. This permission allocates land away from B2/B8 uses towards retail. However, following the removal of this land, the amount of land remaining as B2/B8 is substantially over the 3ha threshold, meaning it is still appropriate for designation. Retail is also not considered to be a sensitive use under the Area of Search constraints methodology and as such its development would not further constrain land considered suitable for the type of waste management facilities that would be delivered on an Area of Search. As such, the authorities continue to support the inclusion of this Area of Search subject to the modification previously tabled.
<b>M52 – Glossary 'Residual Waste'</b>	See MC1 Schedule of Modifications.	No comments were received for this modification.
<b>M53 – Glossary 'Water Bodies'</b>	<u>Collective term for water within watercourses (rivers, ditches, drains), groundwater (held in geological strata such as chalk) and surface water (ponds, lakes, coastal waters).</u>	One comment was received for this modification, from Natural England, in support of the proposed modification.

## Unrelated Comments

A number of additional comments have been made which do not relate to the proposed modifications. These have been collated in the table below.

Response
<p>KTI Energy Ltd has submitted a comment which does not relate to any of the modifications to the Plan. The comment indicates continued support for the allocation of a site, Dunton Garden Suburbs for CHP including district heating in the County. The location of the site is suggested to be changed from that previously supported through the WLP process, to a site outside of the Green Belt in Brentwood Borough.</p> <p>The comment also requires that LACW arising in Essex/Southend-on-Sea is provided to the CHP facility.</p> <p>The Authorities maintain the position that such a site is not needed to support the management of waste in line with net self-sufficiency. Given the late stage at which this alternative site is proposed, it has not been possible to assess its suitability. In any event, the need for the CHP facility and its location at the original site (in light of the assessment results) is not supported by the evidence as discussed during the hearing sessions. The final destination of residual non-hazardous waste is to be determined through a competitive tender process, a matter which is not within the remit of the Waste Local Plan.</p>
<p>There has been a continued objection to the allocation of site W19 – Hastingwood, which is a non-selected site. This site continues to be considered as inappropriate by the Authorities.</p>
<p>With regard to issues raised by Colchester Cycling Campaign, emission standards and controls are beyond the remit of the WLP. This would be addressed by any EA environmental permit.</p>
<p>The recycling targets of 50-60% as quoted by Coggeshall Parish Council are for LACW waste only. The WLP seeks to actively move waste up the waste hierarchy as outlined in the spatial strategy and objectives.</p>
<p>The Nuclear Decommissioning Authority and Magnox suggest the need for factual updates to paragraph 5.3. This would include the addition of the following:</p> <p><i>"Proposals for the management of radioactive waste emanating from beyond the Plan area should meet a need that is not provided for in the area of origin. They should also comply with national strategies for waste management and for radioactive waste management specifically, in the latter case including those produced by the Nuclear Decommissioning Authority."</i></p> <p>It is noted by the WPAs that this update was requested during the Pre-Submission Consultation; however this was excluded from 'MC1 – Schedule of Modifications' in error. The WPAs consider that such updates are minor and factual in nature and as such would seek to</p>



**Response**

make this amendment as part of the final drafting of the Plan for adoption.

Similarly, The Nuclear Decommissioning Authority and Magnox, suggest the need to update Appendix A to include reference to the following National Strategies:

- UK Strategy for the Management of Solid Low Level Waste from the Nuclear Industry (February 2016)
- Nuclear Decommissioning Authority Strategy Effective from April 2016 ("NDA Strategy III")
- National Policy Statement for Nuclear Power Generation (EN-6)

It is noted by the WPAs that this update was requested during the Pre-Submission Consultation; however this was excluded from 'MC1 – Schedule of Modifications' in error. The WPAs consider that such updates are minor and factual in nature and as such would seek to make this amendment as part of the final drafting of the Plan for adoption.

The WPAs note the comments made by the Fairfield Partnership, however no modifications were considered necessary through the hearing sessions and therefore no changes to the allocation of W8- Elsenham have been proposed.

As requested by various respondents, the WPAs will continue to engage with all stakeholders as part of the examination process, and through the outlined consultation methods for planning applications.

## MC2 – Site Assessment and Methodology Addendum

Modification Number	Modification Detail	Response
M17 – Morses Lane, Brightlingsea	<p>See 'Appendix 15 – Table 14 Morses Lane, Brightlingsea' in MC1 Schedule of Modifications.</p> <ul style="list-style-type: none"> <li>• The inclusion of a statement that the facility would be enclosed (bullet point 5).</li> <li>• Additional bullet point regarding the need for new development to not impact on the nearby retail use (bullet point 6).</li> </ul> <p>Morses Lane Site Assessment Scores:</p> <ul style="list-style-type: none"> <li>• '3D – Proximity to Sensitive Receptors' – Red.</li> <li>• '3K – Recreation Facilities' – Amber 2.</li> </ul> <p>See MC2 Site Assessment Methodology Report for the site assessment proforma and rationale for allocation.</p>	<p>The change to criteria '3D – Proximity to Sensitive Receptors' has been to the number of receptors within 250m and to include reference to the secondary school and college. The reference to <i>"within 1km of an existing waste management facility"</i> is not a new addition. The newly constructed properties on Samson Road are in reference to the recent permission (13/00722/FUL).</p> <p>NEEB Holdings suggest the need to include reference to four dwellings to the north of Samsons Road, which were granted planning permission in January 2016 (16/00057/FUL). Although these four properties are within 250m of the proposed site, the score for this criterion is already Red, and an update to this affect would not change the overall scoring or the conclusions within the WLP.</p> <p>Morses Lane does not have three Red scores in totality across the assessment, due to the nature of the site being proposed for various waste management facilities there is the need to group these into three separate categories: Open Air, Enclosed and Enclosed Thermal. These essentially act as three separate assessments for Morses Lane.</p> <p>There has not been a change to the assessment under criteria '2B Traffic and Transportation'. The site has been assessed by the Highways Authority and the B1029 is deemed suitable to accommodate HGV traffic as it is part of the County's main road network.</p> <p>The capacity figure for the site has not been changed. This was</p>

Modification Number	Modification Detail	Response
		<p>not considered an issue previously during hearing sessions as part of the examination process.</p> <p>Criteria's '3A – Planning Background' and '3L – Proximity to Key Centres of Growth' has not been changed. This was not considered an issue previously during hearing sessions as part of the examination process.</p>
M21 - Sunnymead, Elmstead and Heath Farms	<p>See 'Appendix 17 – Table 19 Sunnymead, Elmstead and Heath Farms' in MC1 Schedule of Modifications.</p> <p>Inclusion of recycling operations (new allocation W36) originally allocated at Wivenhoe Quarry (W13). The two operations (L(i)5 and W36) proposed at Sunnymead, Elmstead and Heath Farms are now included within a single table.</p> <ul style="list-style-type: none"> <li>• Update 'Site Allocation For'</li> <li>• Update 'Estimated Availability'</li> <li>• Update 'Life'</li> </ul> <p>New development principles included to reflect the outcome of the assessment process.</p> <p>See MC2 Site Assessment and Methodology Report Addendum for the site assessment proforma and rationale for allocation.</p>	<p>It is noted that the number of sensitive receptors within 250m of Sunnymead is questioned by Tarmac. The receptors have been identified using ECC GIS address point information and is considered to be accurate at the time of assessment (Autumn 2016).</p> <p>The resultant score for this criterion has not affected the overall outcome for the site, given that it is considered in the round with other matters picked up in the site assessment methodology. Inert waste recycling and disposal in this location is supported by the WLP.</p>
M23 – Dollymans Farm	<p>Allocation of site.</p> <p>See 'Appendix 18 – Table xx Dollymans Farm' in</p>	<p>It is noted by the WPAs that under criteria '3K – Recreation Facilities' the text description and colour score do not match. The score should be updated from Green to Amber 2. This is a</p>

<b>Modification Number</b>	<b>Modification Detail</b>	<b>Response</b>
	MC1 Schedule of Modifications for development principles and MC2 Site Assessment and Methodology Report Addendum for the site assessment proforma and rationale for allocation.	minor matter which is not considered to affect the overall conclusions for this site and instead impacts are addressed through the development principles.

### MC3 - Sustainability Appraisal

Modification Number	Modification Detail	Response
M1 – ‘The Waste Challenge at a Glance’	<p>See 'Appendix 1 - The Waste Challenge at a Glance' in MC1 – Schedule of Modifications.</p> <ul style="list-style-type: none"> <li>Update of figures used in ‘The Waste Challenge – best available data, At a Glance’ section to take into account further information arising from the consultation, the Hearings and the addition of L(i)16 – Dollymans Farm.</li> </ul>	<p>This representation seeks additional detail to explain the statement that there would be ‘no significant environmental effects or changes to the SA’ in response to the Plan’s modification that indicates that the plan area will receive waste from London post-2026.</p> <p>It should be noted that this matter was dealt with during the Examination in Public hearing sessions where the waste data evidence was explored in detail. The modification (Modification 1) highlights that imports from London will also be significantly reduced post-2026. The modification also ensures that no non-recyclable or non-biodegradable waste is sent to landfill, and that ‘some provision’ may also be made for the management of residues (energy recovery) at Rivenhall (the only consented plant in the Plan area). This is directly in conformity to the waste hierarchy and the principle of moving waste up the waste hierarchy on a strategic level, with positive sustainable outcomes.</p> <p>Related modifications also respond to the revised ‘Indicative Facility Scale’ for Rivenhall; changing from 360,000tpa to 595,000tpa (Modification 19) for CHP to reflect the current planning permission for the site that was granted in February 2016, after the start of the Pre-Submission Plan</p> <p>The impacts of modifications associated with Rivenhall regarding the transportation of waste and haulage distances can be seen to have increased impacts, but not ‘significant’ impacts as identified consistently within the SA throughout the</p>

Modification Number	Modification Detail	Response
		<p>plan-making process.</p> <p>It should be additionally noted that in 2016, the residual waste output from the Tovi Eco Park Facility in Basildon was exported from the plan area, and that the modification seeks to ensure the management of this waste within the plan area. This is in conformity to notions of self-sufficiency. In so far as a 'business as usual' alternative is relevant for comparison, the export of waste outside the plan area cannot be considered as sustainable an option, or benefitting from a comparable level of certainty, as the management of this residual output at Rivenhall within the plan period and beyond.</p> <p>The SA conclusions related to Rivenhall factor in the proximity of the site to the strategic road network, and conformity to adopted Waste Local Plan Transport Policy (2001), as per the relevant SA site appraisal objective (Sustainability Objective 10) as published for the site in the initial Pre-Submission RWLP SA (February 2016). In addition, Sustainability Objective 12 explored 'public nuisance' factoring in access to and from the site. It should be noted that the SA Site Pro Forma (Pre-Submission SA Environmental Report: Annex C), against which all sites have been appraised, factors in long term impacts of site proposals, reflecting their permanence. As a permanent site proposal, reflecting the nature of the use for CHP, Rivenhall (IWMF2) has been appraised appropriately to receive waste post-2026 and beyond the plan period. The appraisal thus remains appropriate in consideration of the modification that waste will be received at the site post-2026.</p>

Modification Number	Modification Detail	Response
		<p>The SA is a strategic document relevant to the scope of the Plan it accompanies. The SA assesses the principle of allocating the Rivenhall site (IWMF2) for CHP, and concludes that it is the most appropriate site for managing waste in this manner in light of all reasonable alternatives submitted / proposed during the call-for-sites process (also factoring in the cumulative impacts of co-location where necessary). In comparison, the increase in capacity of the site, reflecting the planning permission of February 2016 (after the Pre-Submission RWLP consultation start date) for receiving residual waste cannot be considered significant to the extent that the site becomes in itself unsustainable or unsuitable to manage such waste. In short, the increase in capacity does not affect the overarching principle of managing residual waste at this site, and as a result, the effects of the change in capacity are not significant.</p>
M5 – Policy 3 ‘Strategic Site Allocations’	<p>See ‘Appendix 4 – Policy 3’ in MC1 Schedule of Modifications.</p> <ul style="list-style-type: none"> <li>• Clause 1 – name change of Basildon Waste Water Treatment Works.</li> <li>• Clause 2 – removal of Wivenhoe Quarry allocation, with the facility proposed in the Wivenhoe locality moved to the Sunnymead, Elmstead and Heath Farms allocation.</li> <li>• Clause 3 update to clarify what is meant by ‘other waste’ management.</li> <li>• Clause 4 – inclusion of a new inert recycling allocation at Dollymans Farm,</li> </ul>	<p>Annex C to the Pre-Submission SA contains the detailed site assessment pro forma, including the key criteria and description of highlighted / summarised impacts for sites within the SA. Sustainability Objective 5 seeks to conserve and enhance the historic environment, heritage assets and their settings. This identifies that a ‘negative’ (-) impact is not ‘significant’ (responding to the requirement to identify significant effects within the SEA Regulations) due to the assessment that adequate mitigation is possible. It should be further noted that this assessment has been sourced and completed by historic environmental specialists, as outlined in Annex C of the SA and recommended by Historic England.</p> <p>The allocation of W8 Elsenham is subject to a planning</p>

Modification Number	Modification Detail	Response
	<p>Basildon.</p> <ul style="list-style-type: none"> <li>• Removal of the words “as follows and”.</li> </ul>	<p>application that would be required to meet the criteria of ‘Policy 10 – Development Management Criteria’ of the Pre-Submission Waste Local Plan, which states that, <i>‘Proposals for waste management development will be permitted where it can be demonstrated that the development would not have an unacceptable impact (including cumulative impact in combination with other existing or permitted development) on: ...m) the historic environment including heritage and archaeological assets and their settings’</i>. Additionally, ‘Appendix B – Allocated Sites: Development Principles’ of the Plan, includes for the site at Elsenham, <i>‘The following specific issues and opportunities are to be addressed: ...The proposed development site falls within the setting of the Grade I listed Church of St. Mary the Virgin, the Grade II listed Elsenham Hall, and a group of non-designated heritage assets directly to the east of the church. The land to the west of the haul road should be retained for mitigation purposes only (including a robust scheme of landscaping) with the waste management facility being located entirely within land to the east of the haul road... The impacts from the proposal on designated assets as well as assessing the significance of previously unidentified undesignated assets should address: (1) the setting and significance of the listed buildings in the vicinity of the site; (2) the relationship and impact on the historic parkland including surviving elements such as boundary ditches, earthworks original trees etc. A trial trenching exercise should be undertaken to assess the area for surviving archaeological deposits. If deposits are identified then an appropriate mitigation strategy should be submitted.’</i> The SA concludes that the general and site specific Policy context of the Plan is</p>



Modification Number	Modification Detail	Response
M8 – Policy 5 ‘Enclosed Waste Facilities on Unallocated Sites or Outside Areas of Search’	<p>See ‘Appendix 7 – Policy 5’ in MC1 Schedule of Modifications.</p> <ul style="list-style-type: none"> <li>• Title change to better reflect that the policy applies to enclosed facility proposals on unallocated sites.</li> <li>• Clause 1 – replacement of “or” with “and” and deletion of “and” from “and/or”.</li> <li>• Clause 2 – the addition of “although not exclusively” in relation to waste arising in the Plan Area.</li> <li>• Addition of a final sentence to state that proposals not according with the Policy will be assessed on their merits.</li> </ul>	<p>adequate in ensuring that any potential impacts are mitigated.</p> <p>The SA is a strategic document relevant to the scope of the Plan it accompanies. The SA assesses the principle of allocating the Rivenhall site (IWMF2) for CHP, and concludes that it is the most appropriate site for managing waste in this manner in light of all reasonable alternatives. In comparison, the increase in capacity of the site, reflecting the planning permission of February 2016 (after the Pre-Submission RWLP consultation start date) for receiving residual waste cannot be considered significant to the extent that the site is in itself unsustainable or unsuitable to manage such waste. The increase in capacity does not affect the overarching principles of managing residual waste at this site and it’s appropriateness to allocate in the Plan. As a result, the effects of the change in capacity are not significant.</p> <p>The detail of this comment is not considered relevant to the SA and more relevant to any Environmental Impact Assessment (EIA) associated with the planning permission.</p>
M13 - Policy 10 ‘Development Management Criteria’	<p>See ‘Appendix 11 – Policy 10’ in MC1 Schedule of Modifications.</p> <ul style="list-style-type: none"> <li>• More detail provided around clause b (protection of water resources).</li> <li>• Addition of final sentence setting out that enhancement opportunities should be sought.</li> </ul>	<p>The comment from Natural England is considered relevant to the major modification itself, rather than its assessment in the SA Addendum. See M13 above.</p>
M17 – Morses Lane, Brightlingsea	<p>See ‘Appendix 15 – Table 14 Morses Lane, Brightlingsea’ in MC1 Schedule of Modifications.</p>	<p>The SA concludes that the proposed Modification 17 will have, ‘no significant sustainability effects, or changes to the SA as a result.’ This conclusion was reached in direct response to those</p>

Modification Number	Modification Detail	Response
	<ul style="list-style-type: none"> <li>• The inclusion of a statement that the facility would be enclosed (bullet point 5).</li> <li>• Additional bullet point regarding the need for new development to not impact on the nearby retail use (bullet point 6).</li> </ul> <p>Morses Lane Site Assessment Scores:</p> <ul style="list-style-type: none"> <li>• ‘3D – Proximity to Sensitive Receptors’ – Red.</li> <li>• ‘3K – Recreation Facilities’ – Amber 2.</li> </ul> <p>See MC2 Site Assessment Methodology Report for the site assessment proforma and rationale for allocation.</p>	<p>changes proposed to the development principles for the Morses Lane site.</p> <p>Consideration was given to those relevant hearing statements within the Examination in Public and the subsequent changes to the Site Assessment Report regarding sensitive receptors. It is the overall conclusion of the SA that the newly introduced text to Table 14 Morses Lane, Brightlingsea adequately addresses the changes to the Site Assessment Report in so far as any forthcoming development would have to be enclosed within an appropriate building and configured and operated in regard to impacts on neighbouring land uses, including the potential impacts on the adjacent retail use.</p>
M19 - Rivenhall	<p>Indicative Facility Scale:</p> <p>AD <del>85,000tpa</del> <u>30,000tpa</u></p> <p>CHP <del>360,000tpa</del> <u>595,000tpa</u></p>	<p>The SA is a strategic document relevant to the scope of the Plan it accompanies. The SA assesses the principle of allocating the Rivenhall site (IWFMF2) for CHP, and concludes that it is the most appropriate site for managing waste in this manner in light of all reasonable alternatives. In comparison, the increase in capacity of the site, reflecting the planning permission of February 2016 (after the Pre-Submission RWLP consultation start date) for receiving residual waste cannot be considered significant to the extent that the site is in itself unsustainable or unsuitable to manage such waste. The increase in capacity does not affect the overarching principles of managing residual waste at this site and it’s appropriateness to allocate in the Plan. As a result, the effects of the change in capacity are not significant.</p> <p>The detail of this comment is not considered relevant to the SA</p>

<b>Modification Number</b>	<b>Modification Detail</b>	<b>Response</b>
		and more relevant to any Environmental Impact Assessment (EIA) associated with the planning permission.

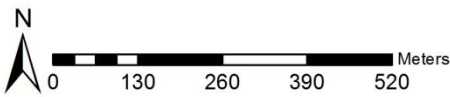
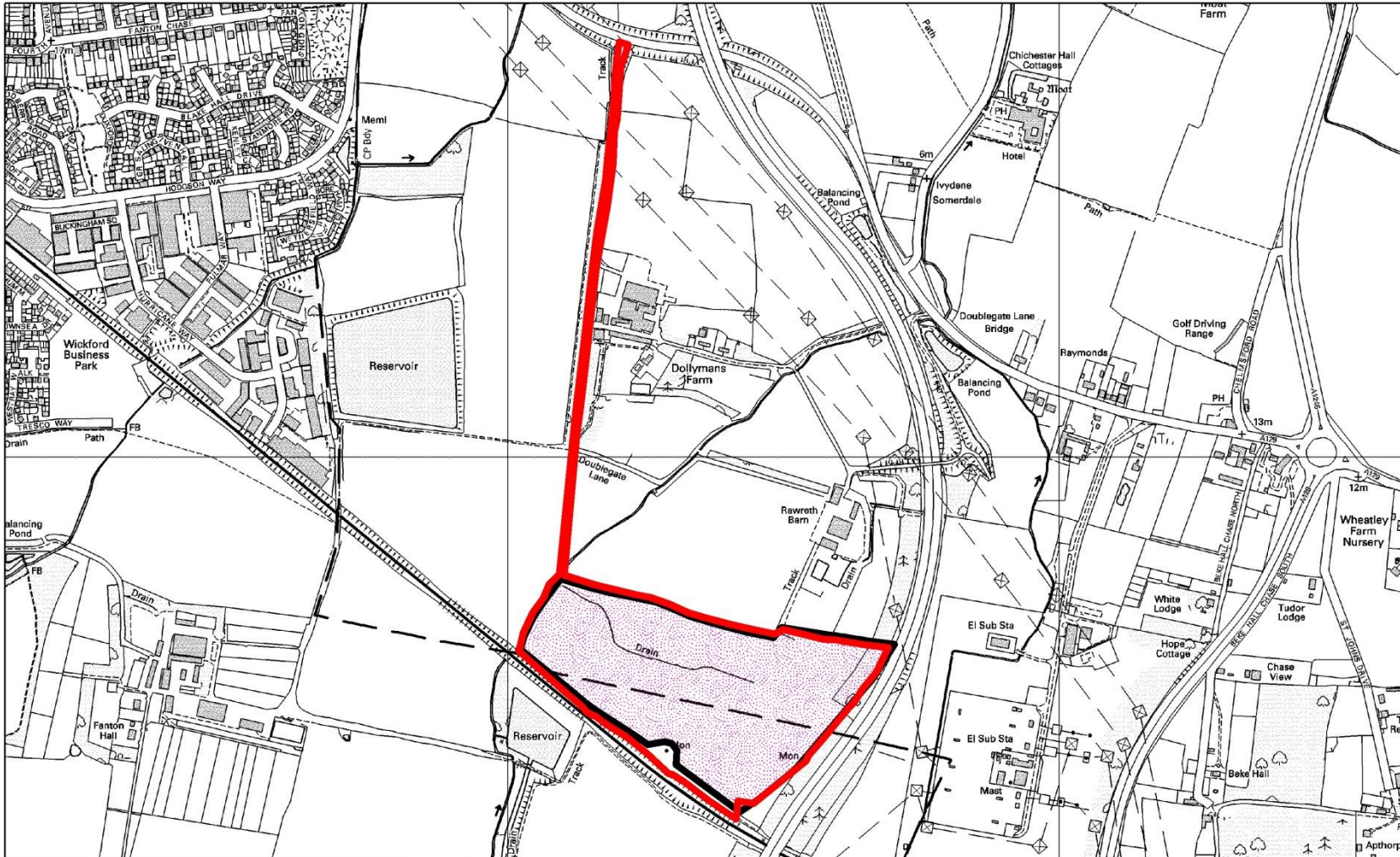
## Appendix A – Dollymans Farm Development Principles

<b>District</b>	Basildon/Rochford
<b>Area</b>	16.09ha
<b>Indicative Facility Scale</b>	500,000 tonnes
<b>Link to Waste and Mineral Activities</b>	The site constitutes a former mineral borrow pit.
<b>Site Allocation for</b>	Inert Landfill Capacity
<b>Access</b>	Via private road adjoining A129
<b>Estimated Availability</b>	2017
<b>Life</b>	Up to 5 years

This site would culminate in the restoration of a former mineral void. The following specific issues and opportunities are to be addressed:

- All access should be via the A129. A Transport Assessment would be required at the planning application stage to review access arrangements and examine safety and capacity of the local road network. This may result in the diversion of bridleway to segregate users from vehicles or other mitigation works.
- **The proposal should demonstrate that there would not be an adverse effect on a European site through HRA. Such an assessment should include consideration of functionally linked land, and must demonstrate no adverse effects on the integrity of any international site. Evidence will change over time regarding the preferences of species such as the Dark-bellied Brent Geese, so appropriate foraging distances should be reviewed as part of any HRA.**
- **Chichester Hall Brook requires protection, for example through an appropriate buffer of at least 15m and through the assessment of potential hydrological impacts with appropriate protection.**
- Restoration of the site through this allocation provides the **significant** opportunity for biodiversity, landscape, visual enhancement **and historic asset preservation**. Careful consideration of the environmental impacts of the waste development will be necessary as part of a planning application with proportionate levels of mitigation to be established. Specifically, the WPA would seek the overall landscape improvement of the site, with the final restoration and long-term aftercare to be beneficial to the Green Belt and biodiversity **with particular reference to habitat creation in line with the Northern Thames Basin National Character Area.**

- Retain trees and shrubs to screen plant and materials from the road. Consider new planting and bunding to screen views into the site **prior to commencement of landfilling operations**.
- Dust mitigation measures, limits on duration (hours of operation) and noise standards (from noise sensitive properties) will be established in the interests of protecting local amenity.
- An Archaeological Desk Based Assessment should be carried out to identify the extent of preservation within the northern part of the site and preservation requirements around war memorials.
- Areas of archaeological deposits preserved in situ will require excavation if working is likely to cause ground disturbance in the north western part of the site
- A management proposal for the survival and maintenance of the memorial for the burial sites should be submitted with any application.



### L(i)16 Dollymans Farm

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- Preferred Site Boundary
- Existing Mineral Permission

# Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Pre-submission Draft

## Equality Impact Assessment

December 2015







# Equality Impact Assessment

## Context

1. under s.149 of the Equality Act 2010, when making decisions, Essex County Council must have regard to the Public Sector Equality Duty, ie have due regard to:
  - eliminating unlawful discrimination, harassment and victimisation, and other conduct prohibited by the Act,
  - advancing equality of opportunity between people who share a protected characteristic and those who do not,
  - fostering good relations between people who share a protected characteristic and those who do not, including tackling prejudice and promoting understanding.
2. The characteristics protected by the Equality Act are:
  - age
  - disability
  - gender reassignment
  - marriage/civil partnership
  - pregnancy/maternity
  - race
  - religion/belief
  - gender and sexual orientation.
3. In addition to the above protected characteristics you should consider the cross-cutting elements of the proposed policy, namely the social, economic and environmental impact (including rurality) as part of this assessment. These cross-cutting elements are not a characteristic protected by law but are regarded as good practice to include.
4. The Equality Impact Assessment (EqIA) document should be used as a tool to test and analyse the nature and impact of either what we do or are planning to do in the future. It can be used flexibly for reviewing existing arrangements but in particular should enable identification where further consultation, engagement and data is required.
5. Use the questions in this document to record your findings. This should include the nature and extent of the impact on those likely to be affected by the proposed policy.
6. Where this EqIA relates to a continuing project, it must be reviewed and updated at each stage of the decision.
7. The EqIA will be published at:  
<http://cmis.essexcc.gov.uk/essexcmis5/BusinessManager.aspx>
8. All **Cabinet Member Actions, Chief Officer Actions, Key Decisions** and **Cabinet Reports must be** accompanied by an EqIA.
9. For further information, refer to the EqIA guidance for staff.
10. For advice, contact:  
Shammi Jalota [shammi.jalota@essex.gov.uk](mailto:shammi.jalota@essex.gov.uk)  
Head of Equality and Diversity  
Corporate Law & Assurance  
Tel 0330 134592 or 07740 901114



## Section 1: Identifying details

Your function, service area and team: Minerals and Waste Planning, Planning and Environment, Place Operations

If you are submitting this EqlA on behalf of another function, service area or team, specify the originating function, service area or team: NA

Title of policy or decision: Replacement Waste Local Plan: Pre Submission Draft

Officer completing the EqlA: Rebecca Rushmer Tel: 0333 013 6818 Email: rebecca.rushmer@essex.gov.uk

Date of completing the assessment: 1 December 2015

## Section 2: Policy to be analysed

2.1	Is this a new policy (or decision) or a change to an existing policy, practice or project? Update to an existing policy
2.2	<p>Describe the main aims, objectives and purpose of the policy (or decision): The Pre-Submission Draft sets out the policy framework for waste planning across the Plan area of Essex and Southend-on-Sea including where waste development will occur for the period to 2032. This document follows the Revised Preferred Approach (2015), Preferred Approach (2011) and Issues and Options (2010) consultations where views were sought on a range of issues and sites to ensure sufficient capacity of waste management facilities in Essex and Southend-on-Sea. The Pre-Submission Draft sets out what approaches to take in terms of the Core Strategy, Development Control Policies, Areas of Search, locational criteria and Site Allocations.</p> <p>What outcome(s) are you hoping to achieve (ie decommissioning or commissioning a service)? The Pre-Submission Draft document is a stage of preparation needed in order to produce and adopt a sound Waste Local Plan. A six-week public engagement will be carried out on the Pre-Submission Draft under regulation 19 of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2012 before an Examination in Public determines the document is 'sound' and approved for adoption. Once adopted, the Replacement Waste Local Plan will replace the existing Waste Local Plan 2001. Carrying out public engagement on the Pre-Submission Draft will allow us to move forward with the plan production process.</p>
2.3	<p>Does or will the policy or decision affect:</p> <ul style="list-style-type: none"><li>• service users</li><li>• employees</li><li>• the wider community or groups of people, particularly where there are areas of known inequalities?</li></ul> <p>Yes - the information and the engagement procedures carried out on this document</p>

	<p>will effect services users, industry, stakeholders and the wider community of Essex in general.</p> <p>Will the policy or decision influence how organisations operate?  Yes - the document sets out the policies and strategy for waste management which will ultimately affect the determination of future waste planning applications. Waste site operators submitting waste planning applications and the wider expectations of community groups will therefore be effected.</p>
2.4	<p>Will the policy or decision involve substantial changes in resources?  No.</p>
2.5	<p>Is this policy or decision associated with any of the Council's other policies and how, if applicable, does the proposed policy support corporate outcomes?</p> <p>The Waste Local Plan is a statutory development plan and the County Council, as Waste Planning Authority (working in partnership with Southend Borough Council) has a legal requirement to keep the plan up to date. The plan will guide waste development and seek to protect the environment. In doing so it will contribute towards the following Corporate Policies and Strategies, and respective themes.</p> <p>Vision for Essex 2013 – 2017. The Vision for Essex sets out the core purpose and key challenges for Essex to:</p> <ul style="list-style-type: none"> <li>• develop and maintain the infrastructure that enables our residents to travel and our businesses to grow;</li> <li>• support employment and entrepreneurship across our economy;</li> <li>• keep our communities safe and build community resilience; and</li> <li>• respect Essex's environment.</li> </ul> <p>By supporting the provision of key infrastructure in a manner that protects the environment, The Waste Local Plan is contributing towards this document.</p> <p>In February 2014 ECC adopted the Outcomes Framework for Essex (2014 – 2018) - a statement of seven outcomes that set out ECC's ambition based on its Vision for Essex 2013-17. The outcomes that are specifically relevant to this Local Plan consultation include:</p> <ul style="list-style-type: none"> <li>• Sustainable economic growth for Essex communities and businesses;</li> <li>• People in Essex experiencing a high quality and sustainable environment.</li> </ul> <p>These are set out in more detail within the Council's Commissioning Strategies. It is noted that the CCGs, which have a significant role in persons health, well-being and independence, have been engaged as prescribed bodies under the duty to co-operate in the preparation of the Replacement Waste Local Plan.</p> <p>The outcomes reflect ECC aspirations for Essex residents and communities, guiding action in the short, medium and long term hence the importance of ensuring the outcomes and strategies inform emerging spatial policy. Waste development supports sustainable growth and the Waste Local Plan will ensure any impacts on the communities of Essex are managed.</p> <p>The Essex Minerals and Waste Development Scheme May 2015 sets out the agreed timetable, key milestones and resources to produce the Waste Local Plan. The timetable sets out when the Pre-Submission Draft engagement is to take place and anticipates adoption by the end of 2016.</p>

Essex Statement of Community Involvement (SCI) 2015 sets out the methodology for consultation and engagement on the Waste Local Plan and has been approved by ECC's Cabinet (September 2015). The SCI stipulates the minimum expectations around the engagement on the Pre-Submission Draft in accordance with the National Planning Policy Framework and test of soundness, and sets out the principles and processes.

Essex Economic Growth Strategy, September 2012 sets out EEC's economic vision and how this may be delivered. The proposals in the EGS are designed to achieve five objectives of which the following two are considered most relevant:

- Essex businesses are enabled and supported to be more productive, innovate and grow thereby creating jobs for the local economy;
- Securing the highways, infrastructure and environment to enable businesses to grow.

Associated Southend Borough Council supporting documents:

Southend Community Strategy (2010)

Southend Borough Council Corporate Priorities 2015-16

Southend Local Development Scheme (2015)

Southend Statement of Community Involvement (2013)



### Section 3: Evidence/data about the user population and consultation<sup>1</sup>

As a minimum you must consider what is known about the population likely to be affected which will support your understanding of the impact of the policy, eg service uptake/usage, customer satisfaction surveys, staffing data, performance data, research information (national, regional and local data sources).

3.1	What does the information tell you about those groups identified? The Pre-Submission Draft is produced to aid the wider Essex and Southend community and will affect the protected characteristic groups equally.
3.2	Have you consulted or involved those groups that are likely to be affected by the policy or decision you want to implement? If so, what were their views and how have their views influenced your decision? No - see 3.3 below
3.3	If you have not consulted or engaged with communities that are likely to be affected by the policy or decision, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary: A six-week public engagement will be carried out on this document. The engagement will be publicised via letters/emails to stakeholders/industry/businesses/those residing within 250 metres of a proposed site, a poster campaign, the ECC website and a public notice in county-wide newspapers.

<sup>1</sup> Data sources within EEC. Refer to Essex Insight:  
<http://www.essexinsight.org.uk/mainmenu.aspx?cookieCheck=true>  
with links to JSNA and 2011 Census.



## Section 4: Impact of policy or decision

Use this section to assess any potential impact on equality groups based on what you now know.

Description of impact	Nature of impact Positive, neutral, adverse (explain why)	Extent of impact Low, medium, high (use L, M or H)
Age	<p>Adverse - Old age combined with disability, limited income or limited mobility could make it difficult to view the engagement documents.</p> <p>The elderly may not be familiar with or may face obstacles when using electronic methods of communication to view the documents and respond to the engagement.</p>	M
Disability	<p>Adverse - Depending on the nature of the disability, those in this category may have difficulty in reading the document and its associated engagement material. Those with disabilities may also have issues with hearing/speaking at any events associated with the Pre-Submission Draft engagement or in accessing venues for engagement events.</p>	H
Gender	Neutral - no perceived negative impact	L
Gender reassignment	Neutral - no perceived negative impact	L
Marriage/civil partnership	Neutral - no perceived negative impact	L
Pregnancy/maternity	Neutral - no perceived negative impact	L



Race	<p>Adverse - Engagement methods (viewing letters, publicity, documents and responding) are based around a good understanding of written English. Without this understanding letters run the risk of being ignored and the opportunity for involvement lost.</p> <p>Adverse - Certain methods of engagement also require a good command/understanding of spoken English to secure awareness and involvement - for example attending any public meetings, workshops or drop-in sessions. Spoken information could be missed or misunderstood if information is relayed too quickly or in a complex way.</p>	M
Religion/belief	Neutral - no perceived negative impact	L
Sexual orientation	Neutral - no perceived negative impact	L
<b>Cross-cutting themes</b>		
<b>Description of impact</b>	<b>Nature of impact</b> Positive, neutral, adverse (explain why)	<b>Extent of impact</b> Low, medium, high (use L, M or H)
Socio-economic	<p>Adverse - There could be issues viewing engagement documents and responding online for those without internet access at home. The cost of travelling to view engagement material and attend associated events could also be an issue for some people.</p> <p>Adverse - various issues could arise for this group due to the location of the waste sites themselves.</p>	H



<p>Environmental, eg housing, transport links/rural isolation</p>	<p><b>Poor transport links could affect attendance at engagement meetings/events and viewing documents at inspection locations.</b></p> <p><b>Rural areas of the county with poor broadband connections could hinder those wishing to use the internet to view information and respond.</b></p> <p><b>Waste sites are often situated in rural areas which could mean such areas are effected by noise, dust emissions, light pollution and any health issues associated with such sites.</b></p>	<p><b>M</b></p>
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## Section 5: Conclusion

		Tick Yes/No as appropriate	
5.1	Does the EqlA in Section 4 indicate that the policy or decision would have a medium or high adverse impact on one or more equality groups?	No <input type="checkbox"/>	
		Yes <input checked="" type="checkbox"/>	If ' <b>YES</b> ', use the action plan at <b>Section 6</b> to describe the adverse impacts and what mitigating actions you could put in place.



## Section 6: Action plan to address and monitor adverse impacts

What are the potential adverse impacts?	What are the mitigating actions?	Date they will be achieved.
<p>Age - the elderly could face issues when accessing engagement information and using electronic communications</p>	<p>Paper copies of the main engagement document and its accompanying summary document are to be made available to view at Essex and Southend libraries, Essex district/borough/city councils, at County Hall in Chelmsford and at Civic Centre in Southend during office hours. This significant undertaking ensures access to paper copies to the great majority of the County's population.</p> <p>Those who cannot travel to view the documents at libraries and local councils but have the internet can access the documents at any time via the online portal.</p> <p>Home and library computers have the facility to increase the font size of documents as well as adjust the brightness of the screen so to be seen clearer. Library computers also include magnification and narrator options.</p> <p>The team's duty phone help line is available during working hours, where officers are available to answer any questions about the Pre-Submission Draft and its associated documents.</p> <p>People can respond to this waste engagement via post if email and online responses are not an option.</p> <p>Print on demand engagement documents would be considered for those with absolutely no access whatsoever to the information.</p>	<p>Already carried out and will continue to do so</p>



<p>Disability - The disabled could face obstacles with reading or hearing engagement information as well as speaking at and attending engagement meetings/events</p>	<p>Engagement documents and information are available in alternative formats such as large print, Braille, audio tape etc.</p> <p>Home and library computers all have the facility to increase the font size of documents as well as adjust the brightness of the screen so to be seen clearer. Library computers also include magnification and narrator options.</p> <p>Hearing loops are either built into rooms or can be provided on request during any Pre-Submission Draft engagement meetings and events.</p> <p>ECC and SBC only use Disability Discrimination Act (DDA) compliant venues for consultation/engagement meetings/events.</p>	<p>Already carried out and will continue to do so</p>
<p>Race - Those without a good understanding of written and spoken English or first language is not English could be disadvantaged when becoming involved with the engagement</p>	<p>The Pre-Submission Draft will be accompanied by a summary document, which is a plain English, non-technical document.</p> <p>We ensure engagement letters, documents and public notices adhere to ECC and SBC's principles of clarity and brevity.</p> <p>ECC offers a translation/interpretation service at an appropriate level for all its documents.</p>	<p>Already carried out and will continue to do so</p>



<p>Socio-economic - Those without the internet at home and/or unable to afford the cost of travel to attend any engagement meetings/events could struggle to view and respond</p> <p>Issues with locations of waste sites.</p>	<p>Paper copies of the main engagement document and its accompanying summary document are to be made available to view at Essex and Southend libraries, Essex district/borough/city councils, at County Hall in Chelmsford and at the Civic Centre in Southend during office hours. This significant undertaking ensures access to paper copies to the great majority of the County's population.</p> <p>Free internet access and assistance to use this service is provided by all Essex libraries so that engagement documents can be viewed online by all.</p> <p>Venues for any engagement events are selected for ease of access by both car and public transport.</p> <p>The Pre-Submission Draft has been subject to a sustainability appraisal which includes objectives relating to social and economic issues e.g. To maximise opportunities for economic development.</p>	<p>Already carried out and will continue to do so</p>
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Environmental (Transport and rural areas) - Poor transport links and those living in rural areas with poor broadband could find it difficult to view engagement material, respond and/or attend meetings/events.

Issues of adverse impacts on those living near the proposed waste sites

Essex as a county is currently undergoing a faster broadband project with much of the county already seeing improvements.

The Pre-Submission Draft and its accompanying documents are not only going to be available online - Paper copy 'main' consultation documents are to be made available at Essex libraries, district/borough/city councils and at County Hall in Chelmsford to view during office hours. This means those living in rural areas will never be far from the information they require.

Sites have been chosen with regard to their environmental and social acceptability by avoiding imposing any unacceptable adverse impacts on public health and safety, amenity, the environment, local community or highways. Criteria in the site selection methodology took into account the proximity of any residential properties and sensitive uses to the proposed sites.

The assessment of the sites has been followed through into the site requirements at the Pre-Submission stage.

Such issues would also be considered in more detail at the planning application stage when an application would be subject to an Environmental Impact Assessment.

Policy 23 contains mitigations for the potential adverse communities by setting out criteria for development management. These criteria require developers to evidence that development does not have an unacceptable impact with regard to noise levels, air quality, dust emissions, light pollution and vibration; as well as the general health of the population adjoining to the site.

The Pre-Submission Draft has been subject to a sustainability appraisal which includes objectives relating to social and economic issues e.g. To maximise opportunities for economic development






**Section 7: Sign off**

**I confirm that this initial analysis has been completed appropriately.  
(A typed signature is sufficient.)**

Signature of Head of Service: Graham Thomas

Date: 16/12/15

Signature of person completing the EqlA: Rebecca Rushmer

Date: 01/12/15

**Advice**

Keep your director informed of all equality & diversity issues. We recommend that you forward a copy of every EqlA you undertake to the director responsible for the service area. Retain a copy of this EqlA for your records. If this EqlA relates to a continuing project, ensure this document is kept under review and updated, eg after a consultation has been undertaken.



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The logo for 'place services' is located in the top left corner. It consists of a solid blue square with the words 'place' and 'services' stacked vertically in a white, lowercase, sans-serif font.

**Essex County Council & Southend-on-Sea Borough Council  
Replacement Waste Local Plan: Pre-Submission**

**Sustainability Appraisal and Strategic Environmental Assessment**

**Environmental Report: Non-Technical Summary**

**February 2016**





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## Glossary of Acronyms

ANGSt	Accessible Natural Greenspace Standard
AD	Anaerobic Digestion
ALC	Agricultural Land Classification
AONB	Areas of Outstanding Natural Beauty
AQMA	Air Quality Management Area
BAP	Biodiversity Action Plan
BARR	Buildings At Risk Register
CD&E	Construction, Demolition and Excavation Waste
CH&P	Combined Heat and Power
C&I	Commercial and Industrial wastes
CPZ	Countryside Protection Zone
CWS	County Wildlife Site
DCLG	Department for Communities and Local Government
DEFRA	Department for Environment, Food and Rural Affairs
DPD	Development Plan Document
EA	Environment Agency
EC	European Community
ECC	Essex County Council
EEC	European Economic Community
EHHER	Essex Historic Environment Record
ELV	End of Life Vehicle
EU	European Union
FZ	Flood Zone
GIS	Global Information System
GWh	Giga Watt per hour
ha	Hectare
HARR	Heritage at Risk (in Essex) Register
HEC	Historic Environment Characterisation
HRA	Habitats Regulations Assessment
kW	Kilo Watt
LCA	Landscape Character Areas
LDF	Local Development Framework
LNR	Local Nature Reserves
LoWS	Local Wildlife Sites
MGB	Metropolitan Green Belt
MLP	Minerals Local Plan
MRF	Materials Recycling Facility
MW	Mega Watt
NNR	National Nature Reserve



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NO2	Nitrogen Dioxide
NPPF	National Planning Policy Framework
ODPM	Office of the Deputy Prime Minister
PAS	Planning Advisory Service
PDL	Previously Developed Land
PM10	Particle Matter
PPS	Planning Policy Statement
PRoW	Public Right of Way
RCHW	Recycling Centres for Household Waste
RWLP	Replacement Waste Local Plan
SA	Sustainability Appraisal
SA/SEA	Sustainability Appraisal incorporating the Strategic Environmental Assessment
SAC	Special Areas for Conservation
SARS	Strategic Aggregate Recycling Site
SBC	Southend Borough Council
SEA	Strategic Environmental Assessment
SFRA	Strategic Flood Risk Assessments
SM	Scheduled Monuments
SPA	Special Protection Area
SPZ	Source Protection Zone
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage Systems
TPO	Tree Preservation Order
WCA	Waste Collection Authority
WDA	Waste Disposal Authority
WDD	Waste Development Document
WPA	Waste Planning Authority

## 1 Introduction

Essex County Council (ECC) and Southend-on-Sea Borough Council (SBC) commissioned Place Services to undertake an independent Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) on the Replacement Waste Local Plan: Pre-Submission 2016.

### 1.1 The Waste Local Plan: Pre-Submission 2016

SEA Directive requires: 'An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.' Annex I (a)

As part of its work on the new Waste Local Plan, ECC and SBC as Waste Planning Authorities (WPAs) have prepared a Replacement Waste Local Plan Pre-Submission document for public consultation.

The Pre-Submission document builds on the WPAs' previous progress towards a Waste Development Document (WDD), incorporating a Core Strategy, Site Allocations and Development Management Policies, under the previous planning system. The change from a WDD to a WLP brings the document in line with current planning policy terminology, including revisions in approach to reflect new policy requirements, hence the need for a new consultation. The components of the plan are the same, and the WLP contains:

- Site allocations for waste management facilities
- Strategic Objectives and policy direction
- Development management policies

The Plan has been through a number of stages to get to this point. These are:

- WDD Issues and Options (2010)
- WDD Preferred Approach (2011)
- RWLP Revised Preferred Approach (2015)

All of these iterations of the Plan have been made available for consultation and have been accompanied by a Sustainability Appraisal.

### 1.2 Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA)

SEA originates from the European Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment" (the 'SEA Directive') which came into force in 2001. It seeks to increase the level of protection for the environment; integrate environmental considerations into the preparation and adoption of plans and programmes; and promote sustainable development.

The aim of the SEA is to identify potentially significant environmental effects created as a result of the implementation of the plan or programme

SA examines the effects of proposed plans and programmes in a wider context, taking into account economic, social and environmental considerations in order to promote sustainable development. It is mandatory for Local Plans to undergo a Sustainability Appraisal.

### **1.3 The Aim and Structure of this Report**

The Environmental Report responds to Stages B and C of the Sustainability Appraisal process. This document summaries the key impacts emanating from the Sustainability Appraisal of the Waste Local Plan Pre-Submission 2016. This document:

- Tests the local Plan objectives against the sustainability appraisal framework;
- Develops the Local Plan options including reasonable alternatives;
- Evaluates the likely effects of the Local Plan and alternatives;
- Considers ways of mitigating adverse effects and maximising beneficial effects; and
- Proposes measures to monitor the significant effects of implementing the Local Plan.

## 2 Sustainability Context, Baseline and Objectives

### 2.1 Introduction

The following section outlines the key findings of the Scoping Report which includes an outline of the plans and programmes, the baseline information profile for the Plan Area, together with the Sustainability Objectives. Annex C accompanying the main report sets out the detailed Sustainability Appraisal Framework and the Site Pro forma.

### 2.2 Plans and Programmes

Local Plans must comply with existing policies, plans and programmes at national and regional levels and strengthen and support other local plans and strategies. It is therefore important to identify and review those policies, plans and programmes and Sustainability Objectives which are likely to influence the Plan at an early stage.

**Table 1: Key Documents**

International / National Plans and Programmes
National Planning Policy Framework (Mar 2012)
National Planning Policy for Waste (2014)
The Environmental Assessment of Plans and Programmes Regulations 2004
The Public Services (Social Value) Act 2012
EU Landfill Directive
EU Waste Framework Directive
Infrastructure Bill 2014/15
Highways Act 1980
Flood and Water Management Act 2010
The Flood Risk Regulations 2009
Land Drainage Act 1991
Environmental Protection Act 1990
Water Framework Directive
EU Air Quality Directive 2008
Wildlife and Countryside Act 1981
Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011)
Countryside and Rights of Way Act 2000
Natural Environment White Paper (2011)
Active People Survey (Public Health England 2014)
The Public Health Outcomes Framework 2013-2016

The South East Local Enterprise Partnership Strategic Economic Plan
National Highways and Transportation survey (2013/14)
National Waste Management Plan for England 2013
Waste Prevention Programme for England
Accessible Natural Greenspace Standards (Natural England using 2008 baseline)
Council of Europe's European Landscape Convention 2000
Historic England Good Practice Advice notes
<b>County (inc. Southend) Plans and Programmes</b>
Updated Waste Capacity Gap Report 2016 (including Topic Paper 1: Waste Capacity Gap Update [2015])
ECC and Southend-on-Sea Borough Council Waste Local Plan (2001)
ECC Replacement Minerals Local Plan (2014)
Joint Health and Wellbeing Strategy for Essex 2013-2018
The Strategic Economic Plan for Essex 2015-2021
Local Transport Plan 2011
Speed Management Strategy (Mar 2010, with 2014 draft version)
Traffic Management Strategy (Mar 2005)
The Joint Municipal Waste Management Strategy for Essex 2007-2032
ECC SuDS Design and Adoption Guide (draft 2014)
Essex Local Flood Risk Management Strategy (Feb 2013)
Essex Surface Water Management Plans (Dec 2013)
Essex Rights of Way Improvement Plan (May 2009)
Essex Biodiversity Action Plan 2011
<b>District / Borough plans and programmes</b>
Local Plan Core Strategy Revised Preferred Options (2014) note – a Draft Local Plan (2016) due to go out on public consultation at time of writing
Basildon District Local Plan Saved Policies (Sep 2007)
Braintree District Council Local Plan Issues and Scoping document (2015), Braintree District Core Strategy (Sep 2011), Braintree District Council Local Plan Review (2005)
Brentwood Borough Council Local Development Plan (emerging), Adopted Brentwood Replacement Local Plan (Aug 2005) + Saved Policy Direction Aug 2008
Castle Point (new) Local Plan (emerging), Castle Point Local Plan Saved Policies (Sep 2007)
Chelmsford City Council Local Plan Issues and Options (2015), Chelmsford City Council Core

Strategy and Development Control Policies (Focused Review 2013), Site Allocations Plan (2012), North Chelmsford Area Action Plan (2011)
Colchester Borough Council Local Plan (emerging), Colchester Local Plan Focused Review (2014)
Epping Forest Local Plan (emerging), Epping Forest Combined Local Plan (1998) and Alterations (2006) Policy Document (Feb 2008)
Harlow Local Plan 2031 (emerging), Adopted Replacement Harlow Local Plan (Jul 2006) + Saved Policy Direction (2009)
Maldon District Local Plan (emerging), Maldon District Rural Allocations Plan (emerging), Maldon District Replacement Local Plan And Saved Policies (Nov 2008)
Rochford District Allocations Plan (2014), Rochford District Core Strategy (2011)
Tendring Local Plan (emerging), Tendring District Local Plan (Dec 2007)
Uttlesford District Council Local Plan (emerging), Uttlesford Adopted Local Plan (Jan 2005), Saved Policy Direction (Dec 2007)
Southend-on-Sea Borough Council Core Strategy (2007), Southend-on-Sea Borough Council Development Management DPD – Revised Proposed Submission (2014), Southend-on-Sea Borough Council Southend Central Area Action Plan (SCAAP) DPD – Proposed Submission (2012)
Conservation Area Appraisals and Management Plans (District level, across the Plan Area)
Green Infrastructure Strategies (for Harlow, Southend, Caste Point, Basildon, Colchester and Tendring [at present])

## 2.3 Key Baseline Issues and Problems and the Likely Evolution of the Plan Area without Implementation of the Plan

Annex B details the complete Baseline Information profile for the Plan Area relevant to the content of the Plan.

The identification of key sustainability issues and problems facing the Plan Area assist in the finalisation of a set of relevant Sustainability Objectives which would set the framework for the appraisal of the Plan during its preparation. The sustainability objectives are also derived from the review of plans and programmes and a strategic analysis of the baseline information. The following table sets out the key baseline issues and problems and the likely evolution of the Plan Area without implementation of the plan, alongside a relevant Sustainability Objective to identify the problem as relevant to the Plan.

The appraisal will then be able to evaluate, in a clear and consistent manner, the nature and degree of impact and whether significant effects are likely to emerge from the Plan's proposed policies.

**Table 2: Key Sustainability Issues and Problems and State of environment in absence of the Plan**

Key Issues	Description / Supporting Evidence	State of environment in absence of the Plan	Sustainability Objective (SO)
Protecting international biodiversity designations	<p>There are 10 SPA sites in the Plan Area (also Ramsar sites) which include Hamford Water, parts of the Colne and Blackwater estuaries, and the Dengie Marshes which cover approximately 30,524 ha and include coastal areas, estuaries, rivers and lakes/reservoirs.</p>	<p>Although biodiversity and ecological designations are protected internationally and nationally, allocating sites and devising policy criteria in a locally relevant plan-led system enables input by ecology specialists on a site-by-site basis and the best outcomes in light of all alternatives. Without factor in these designations, and general biodiversity concerns, the Plan could lead to inappropriate site allocations and policies that do not reflect the situation.</p>	<p>1) To protect and enhance biodiversity and geological diversity throughout Essex and Southend.</p>
	<p>There are 2 SAC areas in the Plan Area; a large coastal area known as Essex Estuaries stretching from Shoeburyness to Jaywick Sands; and Epping Forest.</p>		
Protecting UK based and local biodiversity designations	<p>In the Plan Area there are 81 SSSIs covering a total of 36,322 ha.</p>		
	<p>There are 7 National Nature Reserves (NNRs) located in the Plan Area.</p>		
	<p>There are currently 48 LNRs in the Plan Area.</p>		
	<p>Ancient Woodlands in the Plan Area cover approximately 12,800ha. or 3.5% of the County</p>		

Key Issues	Description / Supporting Evidence	State of environment in absence of the Plan	Sustainability Objective (SO)
	<p>In the Plan Area there are more than 1,440 LoWS covering over 13,000ha and together with statutorily protected areas they represent the minimum habitat to maintain current levels of wildlife.</p>		
<p>Ensuring policy exists that protects water quality</p>	<p>Surface water drainage can pollute waters; particularly petrol, oil, grease and metals from vehicles associated with the management of ELV facilities and landfill leachate.</p>	<p>Without the Plan’s policy direction, it is possible that permissions are granted without suitable conditions. Water quality issues such as these are often tackled through initiatives on sustainable drainage systems. Without exploring flooding as a site assessment criteria and policy requirement, the Plan could exacerbate flooding issues through inappropriate development.</p>	<p>2) To maintain and enhance water quality and resources.</p>



Key Issues	Description / Supporting Evidence	State of environment in absence of the Plan	Sustainability Objective (SO)
	<p>Adherence to the measures in the Water Framework Directive to achieve good qualitative and quantitative status of all water bodies.</p>	<p>The plan will set the policy direction of what is acceptable in terms of waste management and those of facilities. The allocation of sites will also look at water related criteria; particularly relevant considering the range of water bodies in the Plan Area, including coastal waters and numerous estuaries. The nature of waste management can lead to a deterioration of water quality. Without this being an important consideration in the assessment of site allocations and policy requirements, water quality could worsen in the Plan Area through waste development and management.</p>	
<p>Flood risk</p>	<p>The National Planning Policy Framework seeks to avoid inappropriate development in areas at risk of flooding, but where development is necessary, to ensure that it is safe and does not increase flood risk elsewhere.</p> <p>Surface water flood risk is relatively high in Essex with all main settlements being ranked in the top 1,000 settlements most susceptible to surface water flooding.</p>	<p>Site selection criteria, as well as a Flood Risk Assessment, are used to identify whether broad potential future locations for development represent the most appropriate choices in terms of flood risk. Without the Plan, the level of detail used to inform decisions of a strategic nature would not be as robust, especially regarding cumulative impacts. In addition, policy content can be used to set conditions on developments, or determine their</p>	<p>3) To minimise the risk and impact of flooding.</p>

Key Issues	Description / Supporting Evidence	State of environment in absence of the Plan	Sustainability Objective (SO)
	Significant levels of flood risk have been identified along the Essex coast and inland along river stretches.	refusal in areas of flood risk. Without this being an important consideration in the assessment of site allocations and policy requirements of flooding issues, the baseline could worsen in the Plan Area through inappropriate waste development and management.	
	Large areas of Southend are susceptible to both fluvial and tidal flooding.		
Protecting soils	In the Plan Area, approximately 75% of the land area is considered agricultural land and over half of this is of high grade soils.	The quality of agricultural land has protection within the NPPF, however for economic reasons only. The Plan would be the predominant document in which to protect the wider sustainability aspects of such land from unsuitable waste related development. Without such a focus, development may arise on high quality land.	4) To maximise the sustainable use of land and the protection of soils, safeguarding the best and most versatile agricultural land.
	There are significant areas of Grade 1 agricultural land within Tendring and Rochford Districts, and smaller areas within Maldon District and Colchester Borough.		
Ensuring the sustainable use of land	New and safeguarded waste management facilities should be located in order to adhere to all relevant themes of sustainable development singularly and collectively.	The absence of the Plan could result in permissions being given for a range of facilities that, although the principle of development may be acceptable, would not conform to a spatial distribution strategy across the Plan Area.	

Key Issues	Description / Supporting Evidence	State of environment in absence of the Plan	Sustainability Objective (SO)
<p>Protecting national and local heritage designations and their settings.</p>	<p>There are 13,991 listed buildings in the Plan Area; 272 of which are of exceptional interest (grade I) and 759 which are particularly important buildings of more than special interest (grade II*).</p>	<p>Although heritage and historic designations are protected nationally, allocating sites and devising policy criteria in a locally relevant plan-led system enables input by historic environment specialists on a site-by-site basis and the best outcomes in light of all alternatives. Without such a focus, there could be frequent and significant harm to historic assets and their settings throughout the Plan Area.</p>	<p>5) To conserve and enhance the historic environment, heritage assets and their settings</p>
	<p>There is a fairly even distribution of listed buildings within the Plan Area; however more in Uttlesford and Braintree and also around the town of Colchester.</p>		
	<p>The known archaeological resource in the Plan Area is very varied and highly significant; approximately 37,240 records of archaeological sites and finds.</p>		
	<p>Throughout the Plan Area there are 304 Scheduled Monuments, 228 designated Conservation Areas, 38 historic parks and gardens, and 1 of only 46 Registered Battlefield sites in the country.</p>		

Key Issues	Description / Supporting Evidence	State of environment in absence of the Plan	Sustainability Objective (SO)
Protecting important designated and locally significant landscapes	In the Plan Area there is one AONB, Dedham Vale, which lies on the border of Suffolk and Essex covering an area of 90 sq km.	Although landscape designations are protected nationally, allocating sites and devising policy criteria in a locally relevant plan-led system enables input by landscape specialists on a site-by-site basis resulting in the best outcomes in light of all alternatives. Waste development by nature can be harmful to landscapes. Without such a strong focus on protection and mitigation through a plan-led system, development could occur in high quality landscapes in the Plan Area.	6) To minimise the impact on landscape and townscape character.
	There are 9 local authorities in the Plan Area that have land classified as being within the Metropolitan Green Belt. There are also local authorities within the Countryside Protection Zone.		
	There are many protected lanes in the Plan Area which have significant historic and landscape values. There are also over 100 special verges designated in the Plan Area.		
Transport related air quality issues in key areas	Air quality in Essex is generally good. The largest concentration of industrial processes in Essex are along the Thames Estuary.	Without adequate policy protection, it is conceivable that facilities might be located in unsuitable areas in relation to AQMAs.	7) To protect air quality in the Plan area.
	There are currently 15 Air Quality Management Areas within the Plan Area. Brentwood has the highest number of designated AQMAs with five of these located along the A12.		

Key Issues	Description / Supporting Evidence	State of environment in absence of the Plan	Sustainability Objective (SO)
	<p>Levels of air pollution are generally similar in both rural and urban areas, with exceptions being those Air Quality Management Areas (AQMAs) in or around urban areas. All sites monitored have seen a significant fluctuation in results.</p>		
<p>Energy consumption from transport</p>	<p>In the Plan Area the largest proportion of energy consumption in 2010 was within the transport sector which accounted for 39.3% of the total energy consumed.</p> <hr/> <p>There has been a reduction in fuel consumed on all roads by HGV vehicles in the Plan Area with the exceptions of the M25 at Brentwood and A-roads in Uttlesford.</p>	<p>The Plan has scope to include energy from waste (EfW) facilities if viable and suitable in proposed locations. The likelihood of such proposals being permitted, and in the correct locations, is likely to be weaker in the absence of the Plan.</p>	<p>8) To maximise energy efficiency, the proportion of energy generated from renewable sources and adaptability to climate change.</p>
<p>Opportunities for Energy from Waste (EfW) facilities</p>	<p>Within the Plan Area there are 18 renewable energy schemes either built or in the planning system. These combine to produce a maximum total of 105.5 MW, with the energy generating capacity for two further biomass facilities and a solar farm yet to be accounted for. A number of AD and landfill facilities generate energy from waste.</p>	<p>An absence of the Plan's strategic commitment to minimise waste miles could give rise to inappropriate transport distances to facilities from the sources of waste.</p>	

Key Issues	Description / Supporting Evidence	State of environment in absence of the Plan	Sustainability Objective (SO)
<p>Promote waste prevention and material and energy prior to disposal.</p>	<p>In Essex and Southend, 342,882 tonnes which accounts for 49% of the total household waste was sent to landfill in 2012/13.</p>	<p>Without the Plan it is likely that waste would not be appropriately managed, especially on a strategic scale.</p>	<p>9) To ensure the sustainable management of waste, minimise the quantity of waste landfilled and to maximise the re-use, recovery and recycling of waste.</p>
<p>Addressing capacity deficits in relevant waste streams</p>	<p>There are few facilities that managed organic waste arisings, especially in rural areas and there is a forecasted deficit in capacity requirements over the Plan period.</p>	<p>Without the Plan it is likely that waste would not be appropriately managed, especially on a strategic scale.</p>	<p>9) To ensure the sustainable management of waste, minimise the quantity of waste landfilled and to maximise the re-use, recovery and recycling of waste.</p>
	<p>At present, there are no energy recovery facilities either operational or under construction although there is one with planning permission at Rivenhall.</p>		
	<p>In line with anticipated growth in the Plan Area, it will be important to make sure there is adequate biological treatment capacity for the management of organic waste.</p>		
	<p>In line with anticipated growth in the Plan Area, it will be important to make sure there is adequate inert (CD&amp;E) waste recycling capacity. An amount of inert (CD&amp;E) waste is also imported from London and increases the potential arisings requiring management in the Plan Area.</p>		

Key Issues	Description / Supporting Evidence	State of environment in absence of the Plan	Sustainability Objective (SO)
The capacities of strategic routes	There are persistent network efficiency issues on a number of strategic inter-urban routes - the A12 and M25 and M11 have widely recognised issues with poor reliability and delays. Congestion is common on specific sections of the Council-managed network, including sections of the A127, A130 and A414.	The Plan should seek the correct allocations to reduce waste miles and also explore the validity of sustainable transportation; neither of which could be managed on a strategic scale without the Plan. The impacts of any development on local roads can be negative, and a plan-led system will seek to alleviate these impacts through appropriate site allocations and policy requirements.	10) To promote the sustainable transport of waste and materials within Essex and Southend where viable, and to ensure safe highways access where necessary.
Reducing waste miles	Long distance waste travel occurs where larger or specialist facilities are required for that waste type.		
Importing London waste	Essex and Southend accept London's waste for management. This includes all three main waste streams, non-hazardous, construction, demolition and excavation and hazardous wastes, with the majority being CD&E (inert) and non-hazardous waste. The adopted London Plan 2015 commits to London working towards managing the equivalent of 100% of waste arising (excluding CDEW) inside their Plan Area by 2016. The Pre-Submission Waste Local Plan makes allowances for a proportion of London's CDEW as informed by the Duty to Co-operate.		
Health impacts, and perceived health impacts on neighbouring receptors	Health impacts associated with dust, noise and odour are difficult to ascertain where impacts are mitigated through a plan-led system.	Impacts related to dust, noise and odour may increase without those policies in the Plan that ensure such impacts are mitigated.	11) To protect health and well-being in the Plan Area.

Key Issues	Description / Supporting Evidence	State of environment in absence of the Plan	Sustainability Objective (SO)
The capacities of strategic routes and local roads	There are persistent network efficiency issues on a number of strategic inter-urban routes - the A12 and M25 and M11 have widely recognised issues with poor reliability and delays. Congestion is common on specific sections of the Council-managed network, including sections of the A127, A130 and A414.	Without the evidence base of the Plan, which includes specialist highways input, it is likely that permissions would be granted in less sustainable locations..	12) To minimise public nuisance from waste treatment and disposal and from access to and from facilities.
Noise impacts from waste facilities	Ambient or environmental noise is defined as noise which is either unwanted or harmful. Some waste facilities can create noise that could impact on sensitive receptors	The cumulative impact of new facilities regarding noise on sensitive receptors might not be considered in the absence of a plan-led system. Similarly a plan-led approach will ensure mitigation and locational criteria for different types of waste facilities.	
Supporting economic growth and associated projects	Economic growth and development in the Plan Area has to be supported by appropriate facilities that adhere to the waste hierarchy.	The Plan will help ensure that appropriate facilities support growth and significant infrastructure projects in terms of the capacities and locations of facilities.	13) To support economic development in the Plan Area, including jobs arising from waste related activities.
Providing jobs in waste related industries	The relationship between the location of facilities and key centres for growth.	The Plan can ensure that large scale facilities are in proximity to key centres of population and growth. It can also ensure that waste development occurs in areas that support economic growth. Policies also exist that ensure that the waste development does not give rise to any loss of wider economic benefits.	



Key Issues	Description / Supporting Evidence	State of environment in absence of the Plan	Sustainability Objective (SO)
		Without such an approach it is likely that economic growth would suffer in the Plan Area.	

## 2.4 The Appraisal of Policies

The SA of the Plan appraises the document’s policies against the Sustainability Objectives (SOs) outlined in the SA framework. The aim is to assess the sustainability effects of the Plan following implementation. The appraisal will look at the secondary, cumulative, synergistic, short, medium and long-term permanent and temporary effects in accordance with Annex 1 of the SEA Directive, as well as assess alternatives and suggest mitigation measures where appropriate. The findings will be accompanied by an appraisal matrix which will document the effects over time.

For clarity, within this Environmental Report, appraisals will be set out in the same format as shown in the following table.

**Table 3: Impact on Sustainability Objectives**

	Sustainability Objectives (SO)												
	1	2	3	4	5	6	7	8	9	10	11	12	13
Short Term													
Medium Term													
Long Term													

The content to be included within the table responds to those ‘significant effects’ of the policy or element of the Plan subject to appraisal. Appraisals will also look at the following:

- Temporal effects;
- Secondary, Cumulative and Synergistic effects;
- The appraisal of Alternatives;
- Impacts on indicators; and
- Proposed mitigation measures / recommendations

These, and ‘significant effects’ are further described in the following sub-sections.

### 2.4.1 Description of ‘Significant Effects’

The strength of impacts can vary dependant on the relevance of the policy content to certain sustainability objectives or themes. Where the policies have been appraised against the SA/SEA Sustainability Objectives the following key has been used to illustrate a range of possible impacts:

++	Significantly Positive	-	Negative
+	Positive	--	Significantly Negative
/	Uncertain	0	No impact

Commentary is also included to describe the significant effects of the policy on the sustainability objectives.

### 2.4.2 Description of ‘Temporal Effects’

The appraisals of the policies contained within the Plan recognise that impacts may vary over time. Three time periods have been used to reflect this and are shown in the appraisal tables as S (short term), M (medium term) and L (long term). For the purpose of the policy elements of the Plan S, M and L depict:

(S) Short term and (M) Medium Term: Early stages of the plan period.

(L) Long term: Latter stages of the plan period / restoration / beyond restoration (where relevant)

### **2.4.3 Description of ‘Secondary, Cumulative and Synergistic Effects’**

In addition to those effects that may arise indirectly (secondary effects), relationships between different policies will be assessed in order to highlight any possible strengthening or weakening of impacts from their implementation together. Cumulative effects respond to impacts occurring directly from two different policies together, and synergistic effects are those that offer a strengthening or worsening of more than one policy that is greater than any individual impact.

### **2.4.4 Description of ‘Alternatives Considered’**

Planning Practice Guidance states that reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable.

Alternatives for the direction of policies will be appraised and chronicled alongside each appraisal, together with the reason for their rejection / non-progression.

### **2.4.5 Description of ‘Proposed Mitigation Measures / Recommendations’**

Negative or uncertain impacts may be highlighted within appraisals. As such, mitigation measures may be needed and these will be highlighted in this section for each policy where relevant. In addition to this, this section will also include any recommendations that are not directly linked to negative or uncertain impacts, but if incorporated may lead to sustainability improvements.

### 3 The Strategy

#### 3.1 The Proposed Vision

	Sustainability Objectives (SO)												
	1	2	3	4	5	6	7	8	9	10	11	12	13
Short Term	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Medium Term	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Long Term	+	+	+	+	+	+	+	+	++	+	+	+	+

The Vision focuses on waste management, and as such the only significant effect will be realised for Sustainability Objective 9 (defined as ‘to ensure the sustainable management of waste landfilled, to maximise the re-use, recovery and recycling of waste and to promote the minimisation of waste produced at source’). The Vision strongly adheres to this objective through a commitment to the specifics of the Waste Hierarchy without disregarding the Plan Area’s key issues and requirements. Conformity to other Sustainability Objectives is more directly adhered to in the Plan’s policies appraised elsewhere in this document, although minor positive impacts across all the Sustainability Objectives can be expected through the Vision, where it iterates national requirements and guidance in a local context.

##### 3.1.1 Temporal Effects

As the Vision focuses on the Plan Area in 2032, no short or medium term impacts have been predicted although it should be recognised that steps taken in the short and medium term will themselves give rise to positive impacts. The Plan’s policies focus on how the Vision is achieved throughout the plan period, and these have been subject to appraisal elsewhere in this document. As such the Significant Effects section of the Vision appraisal focuses on the long term temporal impacts.

##### 3.1.2 Secondary, Cumulative and Synergistic Effects

A commitment to moving waste management up the waste hierarchy, particularly recycling, is also consistent with the minerals supply hierarchy as specified in the Adopted MLP, which has further synergistic positive impacts on Sustainability Objective 4 (To maximise the sustainable use of land and the protection of soils, safeguarding the best and most versatile agricultural land).

##### 3.1.3 Alternatives Considered

- Alternative 1: To plan more strictly for self-sufficiency

	Sustainability Objectives (SO)												
	1	2	3	4	5	6	7	8	9	10	11	12	13
Alternative 1	/	+	+	-	+	/	/	+	+	/	/	/	++

Reason for rejection: The Preferred Vision’s concept of planning for net self-sufficiency ‘where practicable’ aligned the Vision with current national guidance, which states that ‘there are clearly some wastes which are produced in small quantities for which it would be uneconomic to have a

facility in each local authority'. The alternative of strict net self-sufficiency, iterating the national stance before the NPPF, was re-explored and rejected for the reason that local circumstances dictate that this is not a practicable approach. The alternative of strict net self-sufficiency would, for example, require facilities for waste streams that are better managed outside the Plan Area. The plan's evidence base supports a notion that these facilities are not considered practical to be provided within the local context of the Plan Area and as such the alternative of strict self-sufficiency was rejected, and the Pre-Submission Vision has been selected in order to meet national requirements in a local context.

### 3.1.4 Proposed Mitigation Measures / Recommendations

No mitigation methods have been recommended.

## 3.2 The Strategic Objectives

RWLP Objectives	Sustainability Objectives (SA Objectives)												
	1	2	3	4	5	6	7	8	9	10	11	12	13
1 Maximise waste prevention	0	0	0	0	0	0	0	0	++	0	0	0	0
2 Re-use, Recycling & Recovery	0	0	0	+	0	0	0	0	++	0	0	0	0
3 Safeguarding existing infrastructure	0	0	0	++	0	0	0	0	+	0	0	0	0
4 Self-sufficiency / London waste	0	0	0	+	0	0	0	0	++	0	0	0	0
5 Site Allocations and flexibility	0	0	0	0	0	0	0	0	++	0	0	0	0
6 Reduce greenhouse gas emissions	0	0	0	+	0	0	+	++	0	+	0	0	+
7 Sustainable economic growth	0	0	0	0	0	0	0	++	0	0	0	0	++
8 Health / Amenity / Environment	+	0	0	0	0	/	0	0	0	0	++	+	0

There will be significant positive impacts on SA Objective 4 (to maximise the sustainable use of land and the protection of soils, safeguarding the best and most versatile agricultural land) through safeguarding and enhancing existing strategic waste infrastructure (SO3). There will also be minor positive impacts through reducing the amount of waste sent to landfill (SO2), net self-sufficiency (SO4) and promoting development on appropriate employment land in urban areas (SO6) where

they promote the sustainable use of land.

There will be significant positive impacts on SA Objective 8 (to maximise energy efficiency, the proportion of energy generated from renewable sources and adaptability to climate change) through SO6, which pursues opportunities for energy recovery and utilisation, and also SO7 which seeks to use waste as a resource as a source of energy.

There will be significant positive impacts on SA Objective 9 (to ensure the sustainable management of waste landfilled, to maximise the re-use, recovery and recycling of waste and to promote the minimisation of waste produced at source) through seeking to maximise waste prevention (SO1), increasing the quantity and quality of waste re-used, recycled and recovered (SO2) achieving and delivering net self-sufficiency (SO4) and ensuring suitable strategic site allocations are made to meet predicted demand regarding all relevant facilities (SO5). There will also be positive impacts through safeguarding and enhancing existing infrastructure (SO3).

There will be significant positive impacts on SA Objective 11 (to protect human health and well-being and maintain the quality and quantity of public open space amenity across Essex and Southend) where SO8 seeks to ensure that new waste facilities are well operated to reduce the potential adverse effects on human health, amenity and the environment.

There will be significant positive impacts on SA Objective 13 (to maximise opportunities for economic development, including jobs, arising from waste related activities) where SO7 seeks to maximise opportunities for sustainable economic growth by using waste as a resource for local industry and a source of energy. Similarly, there will be a minor positive impact where waste development is promoted on appropriate employment land in urban areas (SO6), which is likely to correlate with planned housing growth in the plan period.

There is a single uncertain element arising from SO8 on landscape and townscape character (SA Objective 6), where it is unclear whether this issue is sufficiently covered under 'general amenity'.

### **3.2.1 Temporal Effects**

There will be no temporal effects regarding the impacts of the Strategic Objectives.

### **3.2.2 Secondary, Cumulative and Synergistic Effects**

Despite SA Objectives 2 (water quality), 3 (flooding), 5 (historic environment) and 6 (landscape / townscape) not having been met directly by the Strategic Objectives, a number of indirect impacts will arise from the successful implementation of the Strategic Objective 8. Strategic level waste development plans can not be expected to focus directly on these SEA Objectives, but rather account for any impacts on receptors that may occur as a result of the plan's primary focus. Similarly, although sustainable methods of waste transportation (SA Objective 10) are not specifically mentioned within any of the Strategic Objectives, there will be indirect cumulative impacts on this objective through reducing the amount of waste at its source (SO1) and reducing imports from London (SO3).

### **3.2.3 Alternatives Considered and Reasons for Rejection**

No specific alternative approaches to the Strategic Objectives have needed identification for consideration and assessment for the purposes of Sustainability Appraisal.

### **3.2.4 Proposed Mitigation Methods / Recommendations**

There is scope for the Strategic Objectives to cover landscape, townscape and the historic

environment more clearly, possibly within Strategic Objective 8, where the issue is not directly relevant to environmental or amenity concerns. Despite this though the SA is satisfied that these issues are sufficiently covered in other Plan Policies and also through the site assessment methodology used to select appropriate sites.

### 3.3 The Overall Spatial Strategy

	Sustainability Objectives (SO)												
	1	2	3	4	5	6	7	8	9	10	11	12	13
Short Term	/	/	/	++	/	/	/	/	++	++	/	/	++
Medium Term	/	/	/	++	/	/	/	/	++	++	/	/	++
Long Term	/	/	/	++	/	/	/	/	++	++	/	/	++

There will be significant positive impacts on the sustainable management of waste (SO9), the sustainable transportation of waste (SO10) and economic growth (SO13) in line with the Spatial Strategy’s commitments to allocating and safeguarding strategic sites, the identification of suitable employment areas for which waste management facilities are deemed suitable (Areas of Search) and a general distribution focused on key centres for growth. There will also be significant positive impacts on the sustainable use of land (SO4) through the exploration of the co-location of facilities and with compatible non-waste development. The strategy has been broadly assessed as having uncertain impacts on the remaining Sustainability Objectives where they relate to local level issues that can not be adequately covered at this scale. These impacts have been explored in the appraisal of the Plan’s policies and can be found elsewhere in this report.

#### 3.3.1 Temporal Effects

The temporal effects of the Spatial Strategy will remain largely uncertain for the majority of the Sustainability Objectives due to the flexible nature of the approach in response to growth. The positive impacts highlighted above will remain and are likely to strengthen in the long term, particularly regarding the sustainable management of waste (SO9).

#### 3.3.2 Secondary, Cumulative and Synergistic Effects

There will be positive cumulative impacts in relation to the sustainable transportation of waste within Policy 12, which deals more specifically with this requirement.

#### 3.3.3 Alternatives Considered

- Alternative 1: Expansion and co-location with existing facilities;
- Alternative 2: Existing key urban centres of population and growth;
- Alternative 3: De-centralised approach;
- Alternative 4: Areas with limited existing capacity; or
- Alternative 5: A hybrid option

	Sustainability Objectives (SO)												
	1	2	3	4	5	6	7	8	9	10	11	12	13
<b>Alternative 1</b>	/	/	/	+	/	/	/	/	+	/	/	/	+
Reason for rejection: This approach would lead to certain areas, such as the north west of the Plan Area, to continue to be less well served. The approach is similarly inflexible regarding its response to growth across the Plan Area, particularly since the removal of top down regional growth targets and the requirements of the NPPF for Local Planning Authorities (LPAs) to objectively assess their needs for growth. For these reasons this alternative has been rejected.													
<b>Alternative 2</b>	/	/	/	/	/	/	/	/	++	++	/	/	+
Reason for rejection: This approach would singularly also lead to certain areas, again such as the north west of the Plan Area, to continue to be less well served. The approach, although responding better to expected growth in the Plan Area than Alternative 1, can also be considered inflexible regarding its response to growth across the Plan Area since the removal of top down regional targets and the requirements of the NPPF for Local Planning Authorities (LPAs) to objectively assess their needs for growth. This could lead to growth being focussed outside existing settlements. The alternative is limited in its scope to adapt to changing circumstances in the Plan Area and for these reasons this alternative has been rejected.													
<b>Alternative 3</b>	/	/	/	/	/	/	/	/	+	/	/	/	+
Reason for rejection: The alternative alone does not allow for economies of scale. The local level provision of facilities would require a lot more mitigation of individual impacts and improvements to the rural road network specific to each facility and with negligible secondary benefits. For these reasons the alternative has been rejected.													
<b>Alternative 4</b>	/	/	/	/	/	-	-	/	--	-	/	/	-
Reason for rejection: The alternative fails to respond to the proximity principle within the Plan Area and may be seen as too heavily influenced by London imports. Whilst areas of limited capacity are known, these may not accurately respond to a waste capacity need, particularly as waste data is not able to be collated at a district or smaller level. The alternative would also require significant improvement of infrastructure routes, which is not a feasible approach. For these reasons the option was rejected.													
<b>Alternative 5</b>	/	/	/	+	/	/	/	/	--	+	/	/	/
Reason for rejection: The Integrated Waste Management Facility at Stanway is not a Preferred Site allocation as the planning permission previously granted has now expired. This would see the Plan underproviding. As such, this Spatial Strategy option can not be considered viable or a reasonable alternative.													

### 3.3.4 Proposed Mitigation Measures / Recommendations

No mitigation measures have been recommended.



### 3.4 Policy 1: Need for Waste Management Facilities

	Sustainability Objectives (SO)												
	1	2	3	4	5	6	7	8	9	10	11	12	13
Short Term	0	0	0	0	0	0	0	0	++	0	0	0	0
Medium Term	0	0	0	0	0	0	0	0	++	0	0	0	0
Long Term	0	0	0	0	0	0	0	0	++	0	0	0	0

The Policy will have significantly positive impacts on the sustainable management of waste (SO9) in response to the preferred methodology for forecasting arisings for each of the waste streams. The Policy is flexible in adapting to possible changes over the Plan period and has been formulated in line with national guidance (Planning Practice Guidance), requirements and the principles of the Waste Hierarchy. The approach factors in growth for non-hazardous organic waste, directly responding to the possible implications of housing growth and in consideration of few adopted District-level Local Plans in the Plan Area (with growth calculated from objectively assessed need). This approach can respond to this, and in line with the Spatial Strategy and the proximity-principle, with a focus on those locations that the largest amount of growth is most likely to be experienced.

#### 3.4.1 Temporal Effects

There will be no temporal effects as a result of this Policy. The flexibility of the approach allows the WPA to plan effectively for future uncertainty surrounding growth levels in the Plan Area over the Plan Period.

#### 3.4.2 Secondary, Cumulative and Synergistic Effects

This Policy can respond to changes in growth in the Plan Area in accumulation with the Spatial Strategy and the proximity-principle, with a focus on those locations that the largest amount of growth is most likely to be experienced. There will therefore be positive cumulative impacts on a large number of relevant sustainability objectives with the Spatial Strategy.

#### 3.4.3 Alternatives Considered using (previous) Revised Preferred Approach (2015) Methodology

- Alternative 1: CD&E –reflecting an increase in arisings based on economic growth (including a mid-range scenario between a theoretical uplift of capacity on existing facilities [maximum recycling efficiency] and a reliance on existing facilities at current capacities).
- Alternative 2A: CD&E - an increase in arisings based on economic growth (including a best case scenario, reflecting a maximum recycling efficiency estimate only).
- Alternative 2B: CD&E – an increase in arisings based on economic growth (including the worst case scenario, reflecting the capacity of existing facilities only).
- Alternative 3: (C&I) - a scenario that factors in local arising estimations only.

	Sustainability Objectives (SO)												
	1	2	3	4	5	6	7	8	9	10	11	12	13
<b>Alternative 1</b>	0	0	0	0	0	0	0	0	+	0	0	0	0
Reason for rejection: Regarding inert waste, the Revised Preferred Approach (2015) approach to deriving a baseline figure for arisings assumed an increase in arisings during the Plan period based on a mid-range scenario of two scenarios reflecting the best and worst case of estimating arisings. This would be managed by a mid-range scenario between a theoretical uplift of capacity on existing facilities (maximum recycling efficiency) and a reliance on existing facilities at current capacities. This can be seen to run contrary to the waste chapter of Planning Practice Guidance (PPG), which states that 'Waste planning authorities should start from the basis that net arisings of construction and demolition waste will remain constant over time'. For this reason this alternative has been rejected.													
	Sustainability Objectives (SO)												
	1	2	3	4	5	6	7	8	9	10	11	12	13
<b>Alternative 2A</b>	0	0	0	0	0	0	0	0	/	0	0	0	0
Reason for rejection: This alternative would have issues through a reliance on existing facilities to maximise their efficiency. This would also be dependent on significantly reconfiguring existing sites, which is unlikely to be viable across all sites, and it would also potentially have significant cost implications, with site reconfiguration not necessarily being suitable for environmental reasons on individual sites. For these reasons, the alternative was rejected.													
<b>Alternative 2B</b>	0	0	0	0	0	0	0	0	-	0	0	0	0
Reason for rejection: This alternative does not factor in any planned growth in the Plan Area or London, and is similarly inflexible to any changes in arisings within the Plan period. This would also be dependent on significantly refiguring existing sites, which is unlikely to be viable across all sites, would have significant cost implications, and may not be suitable for environmental reasons on individual sites. For these reasons, the alternative was rejected.													
<b>Alternative 3</b>	0	0	0	0	0	0	0	0	+	0	0	0	0
Reason for rejection: It has been identified within the NPPW that Greater London net imports to the Plan Area requires specific consideration and for this reason it is considered that the Plan's approach must align with that forecasted in the adopted London Plan 2015. In addition, Essex County Council had been involved in the Duty to Co-operate process that governed the formation of the London Plan 2015 and it is now considered prudent to plan based on its forecasts. For these reasons, the alternative was rejected.													

### 3.4.4 Proposed Mitigation Measures / Recommendations

No mitigation measures have been recommended.

### 3.5 Policy 2: Safeguarding Waste Management Sites and Infrastructure

	Sustainability Objectives (SO)												
	1	2	3	4	5	6	7	8	9	10	11	12	13
Short Term	/	/	/	+	/	/	/	+	++	+	+	+	++
Medium Term	/	/	/	+	/	/	/	+	++	+	+	+	++
Long Term	/	/	/	+	/	/	/	+	++	+	+	+	++

There will be positive impacts on SO8 in the safeguarding of facilities that may include energy generation and also ensuring that neighbouring development does not conflict with this function through Waste Consultation Areas. There will also be positive impacts on SO10 through protecting facilities from any neighbouring development that may compromise the sustainable transportation of waste. Further positive impacts are associated with SO11 and SO12, where a degree of certainty is added to the Plan's generally flexible approach. Significant positive impacts will be realised for economic growth (SO13) in line with added flexibility regarding non-waste development in WCAs, specifically should there be wider economic benefits than the retention of the site or the infrastructure for waste use, and alternative provision is made for the displaced waste use. This element of the policy has been newly added to the policy since the Revised Preferred Approach 2015 consultation and is considered a more sustainable overall approach. The Plan's approach to safeguarding existing and allocated sites allows certainty regarding wellbeing, any impacts surrounding nuisance, and also employment opportunities regarding and resulting from strategic and non-strategic sites during the plan-period.

#### 3.5.1 Temporal Effects

Although impacts will not differ over time, it should be noted that all the positive effects of sustainable waste management can exist in perpetuity as a result of this Policy. In particular it ensures economic certainty within the waste industry.

#### 3.5.2 Secondary, Cumulative and Synergistic Effects

There will be secondary positive impacts on human health (SO11) and public nuisance (SO12). Although not the focus of the Policy, Waste Consultation Areas will indirectly protect neighbouring development from the impacts of waste facilities where presumably incompatible development will be directed to other sites post consultation from the WPA. The Policy ensures that any new development proposed within the WCAs would be objected to unless compatible with existing or future waste operations; however the WCAs themselves are also likely to act as a buffer to impacts perceived to be resulting from the waste facility.

#### 3.5.3 Alternatives Considered to Safeguarding

- Alternative 1: Safeguard existing permanent permissions, consistent with WLP policies only;
- Alternative 2: Safeguard existing permanent permissions and waste plan site allocations with an area/capacity or strategic importance exceeding 3ha only;
- Alternative 3: Safeguard existing permanent permissions and waste plan site allocations with an area/capacity or strategic importance over 100,000tpa only.

	Sustainability Objectives (SO)												
	1	2	3	4	5	6	7	8	9	10	11	12	13
<b>Alternative 1</b>	/	/	/	/	/	/	/	+	++	+	+	+	/
Reason for rejection: Singularly, this approach was not deemed to adequately meet the capacity needs of the Plan Area because allocated sites may not be able to be delivered due to incompatible uses being established in their proximity in the future. For this reason the alternative was rejected as the sole approach to safeguarding.													
<b>Alternative 2</b>	/	/	/	/	/	/	/	+	++	+	+	+	+
Reason for rejection: Singularly, this approach would potentially discount otherwise sustainable sites based on their size only. Also the qualifying threshold for what was considered 'of strategic importance' may not be appropriate across the Plan Area in response to the Spatial Strategy and the need for safeguarding small-scale but important facilities, for example Transfer Stations. For this reason the alternative was rejected as the sole approach to safeguarding.													
<b>Alternative 3</b>	/	/	/	/	/	+	/	+	++	/	+	+	+
Reason for rejection: Singularly, this approach would potentially discount otherwise sustainable sites based on their throughput only. Also the qualifying threshold for what was considered 'of strategic importance' may not be appropriate across the Plan Area in response to the Spatial Strategy and the need for safeguarding small-scale but important facilities, for example Transfer Stations. For this reason the alternative was rejected as the sole approach to safeguarding.													

### 3.5.4 Alternatives Considered to Waste Consultation Areas

- Alternative 1: Issues and Options (Issue 18) B – To only safeguard those types of waste facilities which have greater potential for adverse effects on people and the environment;
- Alternative 2: Issues and Options (Issue 18) C – The number and extent of Waste Consultation Zones should be established by local planning authorities through Local Development Frameworks, to take account of local circumstances;

	Sustainability Objectives (SO)												
	1	2	3	4	5	6	7	8	9	10	11	12	13
<b>Alternative 1</b>	0	0	0	/	0	0	0	+	+	+	0	0	0
Reasons for rejection: The alternative approach does not directly conform to the function of the Plan, or the WPA, in terms of safeguarding sites integral to waste management in the Plan Area. As such this approach was rejected.													
<b>Alternative 2</b>	0	0	0	/	0	0	0	/	/	/	0	0	0
Reasons for rejection: The determination of WCAs by district level LPAs would not have positive impacts for the sustainable management of waste in the Plan Area. Similarly, the issue is best managed at the appropriate tier due to extent of the Plan Area as a whole, the need for a strategic approach, and economies of scale. The notion is not compatible with the requirements of the NPPW and is beyond the remit of LPAs. For these reasons the approach was rejected.													

### 3.5.5 Proposed Mitigation Measures / Recommendations

No mitigation measures have been recommended

## 4 Strategic Waste Management Allocations

### 4.1 Policy 3: Strategic Site Allocations

Sites for: BIOLOGICAL WASTE MANAGEMENT														
Site Ref.	Temp Effect	Sustainability Objectives (SO)												
		1	2	3	4	5	6	7	8	9	10	11	12	13
W29 Bellhouse	S / M	/	-	++	++	/	-	/	/	+	+	--	++	++
	L	/	-	++	++	/	-	/	/	+	+	/	++	++
W3 Basildon WWTW	S / M	/	-	/	/	+	/	++	0	++	+	-	++	++
	L	/	-	/	/	+	/	++	0	++	+	/	++	++
W20 Courtauld Road	S / M	/	-	++	/	++	/	++	0	++	+	-	+	++
	L	/	-	++	/	++	/	++	0	++	+	/	+	++
IWMF2 - Rivenhall	S / M	+	-	++	-	++	-	++	++	++	+	--	++	++
	L	+	-	++	-	++	-	++	++	++	+	/	++	++
Sites for: INERT WASTE RECYCLING														
Site Ref.	Temp Effect	Sustainability Objectives (SO)												
		1	2	3	4	5	6	7	8	9	10	11	12	13
W32 Crumps Farm	S / M	/	-	--	-	/	-	/	0	+	+	/	++	+
	L	/	-	--	-	/	-	/	0	+	+	/	++	+
W8 Elsenham	S / M	+	++	++	/	-	-	/	0	+	+	-	++	/
	L	+	++	++	/	-	-	/	0	+	+	/	++	/
W7 Sandon East	S / M	+	-	--	/	+	+	++	0	++	/	-	+	++
	L	+	-	--	/	+	+	++	0	++	/	/	+	++
L(n)1R Slough Farm	S / M	+	-	++	++	/	/	++	0	+	/	-	+	++
	L	+	-	++	++	/	/	++	0	+	/	/	+	++
L(i)10R Blackley (Site 1)	S / M	+	-	++	++	+	/	++	0	+	+	--	++	++
	L	+	-	++	++	+	/	++	0	+	+	/	++	++
W13 Wivenhoe Quarry	S / M	/	-	++	-	++	/	/	0	++	/	--	+	++
	L	/	-	++	-	++	/	/	0	++	/	/	+	++
W31 Morses	S / M	+	++	++	/	/	/	/	0	++	+	-	++	++
	L	+	++	++	/	/	/	/	0	++	+	/	++	++

Lane														
L(i)17R Newport Quarry	S / M	/	-	++	-	+	++	++	0	+	/	-	+	+
	L	/	-	++	-	+	++	++	0	+	/	/	+	+
<b>Site for: OTHER WASTE MANAGEMENT</b>														
Site Ref.	Temp Effect	Sustainability Objectives (SO)												
		1	2	3	4	5	6	7	8	9	10	11	12	13
IWMF2 Rivenhall	S / M	+	-	++	-	++	/	++	++	++	+	--	++	/
	L	+	-	++	-	++	/	++	++	++	+	/	++	/
<b>Sites for: INERT LANDFILL</b>														
Site Ref.	Temp Effect	Sustainability Objectives (SO)												
		1	2	3	4	5	6	7	8	9	10	11	12	13
L(n)7R Little Bullocks A22	S / M	/	--	--	++	/	/	/	0	+	+	--	++	+
	L	/	--	--	/	0	/	0	0	0	0	/	0	0
L(n)1R Slough Farm	S / M	+	--	++	++	/	/	++	0	+	/	--	+	++
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
L(i)10 Blackley (Site 1)	S / M	+	--	++	++	+	/	++	0	+	+	--	++	++
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
L(i)6 Sandon	S / M	-	--	--	++	+	/	++	0	++	/	--	++	++
	L	/	--	--	/	0	/	0	0	0	0	/	0	0
L(i)5 Sunnym- ead	S / M	/	--	++	++	/	++	/	0	+	/	--	+	++
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
L(i)17R Newport Quarry	S / M	/	--	++	-	+	++	++	0	+	/	--	+	+
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
L(n)5 Bellhou- se	S / M	/	--	++	++	+	+	/	0	++	+	--	++	++
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
L(i)15 Fingring- hoe	S / M	/	--	++	/	+	++	++	0	++	++	--	++	++
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
<b>Sites for: (STABLE NON-REACTIVE) HAZARDOUS WASTE LANDFILL</b>														
Site Ref.	Temp Effect	Sustainability Objectives (SO)												
		1	2	3	4	5	6	7	8	9	10	11	12	13

L(n)8R Little Bullocks	S / M	/	--	++	++	+	-	/	0	+	+	--	++	/
	L	/	--	++	/	0	/	0	0	0	0	/	0	0

- As can be seen from the above there will be largely positive impacts from the allocated sites. Despite this, overall water quality (SO2) in the Plan Area could be seen to suffer from the allocations. It should be noted however that many of these impacts will be localised and that development principles, exist within the Plan for each site to ensure that such impacts are appropriately mitigated. In addition, Policy 10 of the Plan has integrated a stronger stance on the protection of water quality, in response to these highlighted impacts.
- A majority proportion of those impacts predicted for landscape quality (SO6) are either uncertain or negative, which translate as moderate to high impacts. The cumulative impact of landscapes in the Plan Area could be seen to deteriorate as a result of the allocations; however again, development principles exist to mitigate such impacts on a site-by-site basis.
- The Plan's allocated sites can be seen to have a large degree of negative impacts on health and well-being (SO11), associated largely with one or more sensitive receptors (properties) being in close proximity to sites and/or PROWs being on or adjacent to sites. Whilst the extent of these negative impacts appears significant, it should be acknowledged that a single property being within 250m of the allocation (regardless of facility type) qualified for a negative score and that such an impact would be capable of mitigation. It should also be acknowledged that, in line with the proximity principle, allocations in close proximity to key centres of growth are invariably more likely to encounter properties in their vicinity. Development principles exist for all the allocated sites, as specified in Appendix B of the Plan, and these contain a number of measures to protect local amenity. In addition, PROWs will have to be re-routed should they be disrupted and the Environment Agency addresses odour issues through the Pollution regime. As such, the negative impacts highlighted are unlikely to be forthcoming from any of the proposals.
- There will be a significant positive cumulative impact on employment opportunities from waste management (SO13) resulting from the allocated sites' proximity to key towns and centres for growth.

#### 4.1.1 Cumulative Impacts of the Strategic Site Allocations by Broad Area

It should be noted that this section explores those impacts where clusters of sites exist, or where any other similarities between sites have been identified and discussed. The potential for cumulative impacts have been identified on the following clusters or groupings of sites as follows:

- L(n)8R, L(n)7R, and W32 (Uttlesford cluster 1)
- W7 and L(i)6 (Chelmsford cluster)
- L(n)5 and W29 (Colchester cluster)
- L(i)15, L(i)5 and W13 (Colchester / Tendring cluster)
- W3 and W20 (Basildon cluster)
- W8 and (Li)17R (Uttlesford cluster 2)

The potential for cumulative impacts on these clusters is explored in the following tables.

**Table 4: Cumulative Impacts of sites L(n)8R, L(n)7R and W32**

Site Ref.	Temp Effect	Sustainability Objectives (SO)												
		1	2	3	4	5	6	7	8	9	10	11	12	13
L(n)8R Little Bullocks	S / M	/	--	++	++	+	-	/	0	+	+	--	++	/
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
L(n)7R Little Bullocks A22	S / M	/	--	--	++	/	/	/	0	+	+	--	++	+
	L	/	--	--	/	0	/	0	0	0	0	/	0	0
W32 Crumps Farm	S / M	/	-	--	-	/	-	/	0	+	+	/	++	+
	L	/	-	--	-	/	-	/	0	+	+	/	++	+

- The sites of L(n)8R, L(n)7R and W32 are all in close proximity to each other, and share a lot of impacts as a result. It can be seen that, in addition to there being significant negative impacts on water quality (SO2) as a result of each allocation individually, there may be further cumulative negative impacts on this objective. The Plan however, recognises the shared impacts of these sites, and although grouped and allocated for different facility types within the Plan, looks at them as a suite of allocations. Each site has different development principles in Appendix B of the Plan that are closely linked and relevant to each specific use, but there will be shared common benefits. The need for a hydrological assessment for site L(n)8R ensures that water quality issues are addressed in terms of hazardous landfill operations in the area. Inert recycling at site W32 will have a lesser impact on water quality and has been raised due to the proximity of a water body and can be mitigated through the requirements of Policy 10, which includes added emphasis on potential water quality issues. It is therefore viewed that the recommendation has been sufficiently factored into the Plan, where effective measures to mitigate the impacts on water quality in the area will be sought and adequately addressed.
- All of the sites will have uncertain impacts on biodiversity, due to their proximity to a LoWS. It is therefore possible that any impacts could magnify cumulatively. The SA at the Revised Preferred Approach (2015) stage indicated that a stance on mitigation would be required for the individual sites. The development principles for both landfill sites state that the LoWS would require protection for example through an appropriate buffer of at least 15m and that existing vegetation should be protected and retained. This seeks to alleviate the possible impacts resulting from these sites.
- Although the sites can be seen to have appropriate transport infrastructure individually, the SA at the Revised Preferred Approach (2015) stage highlighted the cumulative impact of these sites on the localised transport network, and that these would have to be explored in further detail due to their proximity to each other. The development principle for L(n)7R states that a vehicle routing agreement is required to ensure the site would be accessed via the existing access for Crumps Farm onto Stortford Road (B1256) to travel via the A120/M11 and that an internal haul road would be required between the site and the Crumps Farm access. It is considered that this individual requirement would go some way to alleviate the cumulative impact that could arise from this cluster of allocated sites.
- No other significant negative cumulative impacts have been highlighted that can not be



mitigated through each site individually. This includes those impacts associated with sensitive receptors within 250m of each site.

**Table 5: Cumulative Impacts of sites W7 and L(i)6**

Site Ref.	Temp Effect	Sustainability Objectives (SO)												
		1	2	3	4	5	6	7	8	9	10	11	12	13
W7 Sandon East	S / M	+	-	--	/	+	+	++	0	++	/	/	+	++
	L	+	-	--	/	+	+	++	0	++	/	/	+	++
L(i)6 Sandon	S / M	-	--	--	++	+	/	++	0	++	/	--	++	++
	L	/	--	--	/	0	/	0	0	0	0	/	0	0

- Regarding the cumulative impacts of the two sites at Sandon, it should be noted the area of L(i)6 includes the area of W7 and has been appraised as such in this SA. With that in mind, the appraisal of L(i)6 can be seen as reflective of the cumulative impacts of the two Sandon sites.
- The Sandon sites both have a range of negative impacts on water quality (SO2) and flooding (SO3). Despite this, there will be no further cumulative impacts, due to different water bodies being affected that are distinctly separate to specific areas of the site and as such unrelated to each other. The proportion of the site in FZ3 is very small in comparison to the total size of the site and the planning permission of the current operation on the site ensures that there will be no impacts resulting from the allocated uses.
- The SA at the Revised Preferred Approach (2015) stage stated that the cumulative impact of these sites on the localised transport network would also have to be explored in further detail due to their proximity to each other. It should be noted the development principles for the combined site states that improvements will be required to the A1114 (Essex Yeomanry Way) /Southend Road southbound off slip road and that a traffic management/priority control system to manage the single width private haul road in the vicinity of the site access, or alternative solution e.g. road widening/passing bays will be required. These development principles, outlining issues and opportunities to be addressed, sufficiently remove the possibility of cumulative negative impacts on transport where implemented.
- No other significant negative cumulative impacts have been highlighted that can not be mitigated through each site individually.

**Table 6: Cumulative Impacts of sites L(n)5 and W29**

Site Ref.	Temp Effect	Sustainability Objectives (SO)												
		1	2	3	4	5	6	7	8	9	10	11	12	13
L(n)5 Bellhouse	S / M	/	--	++	++	+	+	/	0	++	+	--	++	++
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
W29 Bellhouse	S / M	/	-	++	++	/	-	/	/	+	+	--	++	++
	L	/	-	++	++	/	-	/	/	+	+	/	++	++

- Although considered a single site, the site contains two different operations, namely biological treatment and inert landfill, and these have therefore been assessed separately. Proposed activities on the Bellhouse allocation can be seen to have negative impacts on water quality (SO2) due to the proximity of water bodies to both portions of the site and biodiversity (SO1) due to the presence of nearby LoWSs. The two different operations on site could lead to cumulative impacts on both of these objectives. The development principles for the combined site identifies these issues as a single theme, and states that an appropriate buffer of at least 15m would be provided around CO5 8 Gol Grove and Hanging Wood Local Wildlife Sites and the Roman River. Any new scheme will need to be consistent with the approved restoration scheme for the existing landfill site. As such, it is considered that there would be no cumulative impacts associated with water quality (SO2) or biodiversity (SO1).
- In addition, both operations can be seen to have significantly negative impacts on health and well-being (SO11) due to sensitive receptors (properties) being located within 250m of the combined site area. Again, cumulative impacts are not expected to occur, through the existence of a combined site development principle that states that limits on duration (hours of operation) and noise standards (from noise sensitive properties including Bellhouse Farm) would be required in the interests of protecting local amenity. In addition, any potential odour issues will be addressed by the Environment Agency in the interests of protecting local amenity.

**Table 7: Cumulative Impacts of sites W13, L(i)15 and L(i)5**

Site Ref.	Temp Effect	Sustainability Objectives (SO)												
		1	2	3	4	5	6	7	8	9	10	11	12	13
W13 Wivenhoe Quarry	S / M	/	-	++	-	++	/	/	0	++	/	--	+	++
	L	/	-	++	-	++	/	/	0	++	/	/	+	++
L(i)15 Fingring- hoe	S / M	/	--	++	/	+	++	++	0	++	++	--	++	++
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
L(i)5 Sunnym- ead	S / M	/	--	++	++	/	++	/	0	+	/	--	+	++
	L	/	--	++	/	0	/	0	0	0	0	/	0	0

- The sites of W13, L(i)15 and L(i)5 have been grouped where they are located in a broadly similar location, and also in regard to their possible impacts on biodiversity through the international designation of the Colne Estuary as an SPA and Ramsar. In addition to development principles for these sites stating that likely significant effects on the nearby international wildlife sites need to be considered, it should additionally be noted that the Plan, as per the recommendation of the HRA, states that 'planning permission for waste management development within or otherwise affecting an international site (Natura 2000 site) will only be granted where the conclusions of a project-level Habitats Regulations Assessment (HRA), as required for those proposals highlighted within the HRA of the Plan, demonstrate that the proposal will have no adverse impacts on the integrity of any site, either alone or in combination with other plans or projects.' Screening distances are also provided as a guide for potential applicants in relation to the triggers for project-level HRA. The inclusion of this requirement in the Plan will effectively determine whether any impacts

on internationally designated sites are likely. Additionally, project-level HRA will also identify the impacts of proposals in combination with other relevant projects, plans and programmes within the Plan Area. As such there will be no cumulative impacts on biodiversity.

- The sites also have individual negative impacts on water quality (SO2), associated with water bodies in or adjacent to the sites. The differences between negative impacts and significantly negative impacts in the case of these sites is related to the use; landfill warranting more significant impacts due solely to the nature of waste disposal. It is recommended that the mitigation of these water quality issues is included as a development principle for each site. Despite this, and although no development principles exist for any of these sites regarding water quality issues currently, the general theme of water quality has been given additional weight in Policy 10 of the Plan. As such, and in accordance with Policy 10, 'proposals for waste management development will be permitted where it can be demonstrated that the development would not have an unacceptable impact (including cumulative impact in combination with other existing or permitted development) on...(b) The quality and quantity of water within water courses, groundwater and surface water.' This effectively alleviates any concerns regarding the cumulative impacts of water quality regarding this cluster of sites.
- Any cumulative impacts associated with the individual significant negative impacts highlighted for health and well-being (SO11) on all of the sites, are effectively neutralised by each site's development principles that require dust mitigation measures, limits on duration (hours of operation) and noise standards (from noise sensitive properties) in the interests of protecting local amenity.

**Table 8: Cumulative Impacts of sites W3 and W20**

Site Ref.	Temp Effect	Sustainability Objectives (SO)												
		1	2	3	4	5	6	7	8	9	10	11	12	13
W3 Basildon WWTW	S / M	/	-	/	/	+	/	++	0	++	+	-	++	++
	L	/	-	/	/	+	/	++	0	++	+	/	++	++
W20 Courtau- ld Road	S / M	/	-	++	/	++	/	++	0	++	+	-	+	++
	L	/	-	++	/	++	/	++	0	++	+	/	+	++

- As can be seen from the above comparative assessments of the sites W3 and W20 in Basildon, there are a number of significant positive impacts associated with minimising environmental effects, and in the sustainable management of waste (SO9).
- The cumulative impact of these sites on the localised transport network (SO10) would have to be explored in further detail, due to the sites being located in very close proximity to another. This was an issue raised in the SA of the Revised Preferred Approach (2015). Since then, development principles for the sites have been included within the Plan to address specific issues and / or opportunities. With regard to site W3 Basildon WWTW, confirmation will be needed as to how internal access arrangements in relation to Courtauld Road in order to adequately alleviate any cumulative impacts.
- No other significant negative cumulative impacts have been highlighted that can not be mitigated through each site individually.
- Any cumulative impacts associated with the individual negative impacts highlighted for

health and well-being (SO11) on the sites, are effectively neutralised by the fact that any potential odour issues will be addressed by the Environment Agency in the interests of protecting local amenity.

**Table 9: Cumulative Impacts of sites W8 and L(i)17R**

Site Ref.	Temp Effect	Sustainability Objectives (SO)												
		1	2	3	4	5	6	7	8	9	10	11	12	13
L(i)17R Newport Quarry	S / M	/	--	++	-	+	++	++	0	+	/	--	+	+
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
W8 Elsenham	S / M	+	++	++	/	-	-	/	0	+	+	-	++	/
	L	+	++	++	/	-	-	/	0	+	+	/	++	/

- The sites of W8 and L(i)17R are unlikely to have many cumulative impacts, as can be seen above. It should be noted that, in the case of L(i)17R (Newport), the impacts highlighted for inert landfill have been explored for the purposes of this cumulative assessment.
- These sites have been explored as a cluster due to the uncertain transport impacts (SO10) associated with Newport and any subsequent implications this might have on the local road network which could affect the allocation at Elsenham. However, the development principles regarding Newport Quarry state that, 'a vehicle routing agreement is required to ensure the site is accessed via the existing access to Newport Quarry and via the Main Road network (and) consideration would need to be given at the planning application stage to the safe operation of the road bridge over the railway line west of the site access and the requirement for any additional traffic management.' With this in mind, no cumulative impacts have been identified for this objective.

## 5 Areas of Search & Locational Criteria

### 5.1 Policy 4: Areas of Search

	Sustainability Objectives (SO)												
	1	2	3	4	5	6	7	8	9	10	11	12	13
Short Term	0	/	0	+	0	0	/	0	++	+	0	0	/
Medium Term	0	/	0	+	0	0	/	0	++	+	0	0	/
Long Term	0	/	0	+	0	0	/	0	++	+	0	0	/

There will be significant positive impacts on the sustainable management of waste (SO9) through the approach of designating Areas of Search around suitable B2 and / or B8 land as defined in the Local Plans of the districts, boroughs and City in the Plan Area. This allows flexibility within the Plan period in terms of providing sufficient facilities, but also in any instances where it can be justified that a direct site allocation is not suitable, through assessed maintenance of the Plan-led system prior to other, non-allocated locations being submitted. This therefore has a minor positive impact on the sustainable use of land (SO4). Minor positive impacts will also be realised for the transportation of waste (SO10) through the locations specified, and the access criteria against which potential sites have been assessed.

There will be no impacts on a large amount of the Sustainability Objectives in line with their initial assessment being undertaken through the Areas of Search criteria in the Areas of Search Methodology and Assessment document. Despite this however, uncertain impacts have been predicted for water quality (SO2) where the possibility of sites being located in close proximity to water bodies has not been taken into account. It is acknowledged however that any negative impacts in this regard are unlikely on B2 and / or B8 land uses, particularly in existing or allocated employment sites in district-level Local Plans. There will also be uncertain impacts on air quality (SO7) where criteria to protect such (e.g. factoring in the locations of, and impacts on, AQMAs) do not exist in the Areas of Search Methodology and Assessment document; however again it should be acknowledged that the report does not seek to allocate any new areas beyond those already existing or allocated in district-level Local Plans.

There will be uncertain impacts on economic growth and employment opportunities (SO13) where the possible eventual development of B2 or B8 land for waste management facilities is done so to the detriment of any alternative identified employment need in specific sectors and areas. To a lesser extent, although possible however, is that waste infrastructure supports other employment uses and could give rise to increased employment opportunities itself.

#### 5.1.1 Temporal Effects of the approach to identifying Areas of Search

There will be no temporal effects resulting from this Policy.

#### 5.1.2 Secondary, Cumulative and Synergistic Effects of the approach to identifying Areas of Search

There will be a cumulative strengthening of the Spatial Strategy's notion of distribution throughout the Plan Area resulting from this Policy.

### 5.1.3 Alternatives Considered for the approach to identifying Areas of Search

- Alternative 1: To not identify suitable B2 (General Industry) and / or B8 (Storage or Distribution) land for the consideration of waste management facilities.
- Alternative 2: To expand the area of search to employment areas beyond B2 and B8 use classes.
- Alternative 3: To safeguard portions / units of identified suitable areas.

	Sustainability Objectives (SO)												
	1	2	3	4	5	6	7	8	9	10	11	12	13
<b>Alternative 1</b>	0	0	0	/	0	0	0	0	/	/	0	0	0
Reasons for rejection: The alternative would not respond to planning for flexibility within the Plan period. In addition, the approach may see applications for required facilities coming forward on land that does not respond to key centres of growth or in line with the Spatial Strategy. For these reasons this alternative was rejected.													
<b>Alternative 2</b>	0	/	0	/	0	0	/	0	++	/	0	0	/
Reasons for rejection: Under the Use Class Order, waste management facilities are considered sui generis ('in a class of its own') and therefore do not fit under a specific use class. It is, however, considered that of the Use Classes available, B2 and B8 represent the closest fit, as many waste processing activities are similar to the processes that take place on industrial estates. The alternative would likely see incompatibility between uses and there would likely be less interest from landowners of non-B2 / B8 uses to develop their land for waste management facilities. For this reason the alternative was rejected.													
<b>Alternative 3</b>	0	/	0	+	0	0	/	0	++	+	0	0	/
Reasons for rejection: This alternative could not be considered viable. The potential of a specific proposal coming forward from within any such area has not been demonstrated by interested landowners or developers due to the high-level nature of the Areas of Search exercise. As such the alternative was rejected.													

### 5.1.4 Proposed Mitigation Measures / Recommendations for the approach to identifying Areas of Search

No mitigation measures have been recommended.

## 5.2 Policy 5: Enclosed Waste Facilities

	Sustainability Objectives (SO)												
	1	2	3	4	5	6	7	8	9	10	11	12	13
<b>Short Term</b>	0	0	0	++	0	0	/	++	++	++	0	+	+
<b>Medium Term</b>	0	0	0	++	0	0	/	++	++	++	0	+	+
<b>Long Term</b>	0	0	0	++	0	0	/	++	++	++	0	+	+

There will be significant positive impacts on the sustainable use of land (SO4) and transport (SO10) through co-location and a focus on previously developed land; energy (SO8) through a favourable stance on CHP proposals; and the sustainable management of waste (SO9) through a

flexible approach that will assess proposals on their individual merits.

There will also be minor positive impacts on economic growth / job creation (SO13) through the majority of locational criteria focusing enclosed sites in current or traditional employment areas. Minor positive impacts will also be realised on public nuisance and access (SO12) through the utilisation of existing infrastructure and a general presumption against sites in previously undeveloped areas.

Uncertainty has been predicted regarding transport related air quality (SO7) due to many enclosed facilities being compatible with, and suitable within, existing industrial areas that may already experience large movements of vehicles.

### 5.2.1 Temporal Effects

There will be no temporal effects as a result of this Policy.

### 5.2.2 Secondary, Cumulative and Synergistic Effects

There will be secondary positive impacts on biodiversity (SO1), cultural heritage (SO5), landscape (SO6), and health and well-being (SO11) resulting from the majority of criteria responding to co-location, existing industrial sites, redundant farm buildings and brownfield land. The impacts on biodiversity and landscape will also be strengthened through the policy specifying that enclosed thermal facilities would need additional criteria and additional site assessment work to demonstrate that new facilities are more appropriate to those that are allocated.

### 5.2.3 Alternatives Considered

- Alternative 1: To have separate location criteria for the enclosed waste facilities of, materials recycling / recovery and waste transfer stations (Alternative 1A); metal recycling and vehicle dismantling (Alternative 1B); in-vessel composting (Alternative 1C); clinical waste (Alternative 1D); MBT, autoclaving and AD (Alternative 1E); and inert waste recycling (1F).

	Sustainability Objectives (SO)												
	1	2	3	4	5	6	7	8	9	10	11	12	13
Alternative 1A	0	0	0	++	0	0	/	0	++	+	0	/	+
Alternative 1B	+	0	0	++	0	+	/	0	++	+	0	+	+
Alternative 1C	0	0	0	++	0	0	/	0	++	+	0	+	+
Alternative 1D	0	0	0	++	0	0	/	0	+	++	0	/	+
Alternative 1E	0	0	0	++	0	0	/	++	++	+	0	+	+
Alternative 1F	0	0	0	++	0	0	++	0	++	++	0	/	+

Reasons for rejection: Although the alternative is not significantly different from the impacts predicted for the Pre-Submission policy approach, the single approach to enclosed waste facilities can be considered a more flexible approach. The alternative could be considered as more restrictive, limiting certain facilities to specific types of site and the preferred Policy approach instead seeks to direct them to broadly acceptable locations and determine them on their own merits. For these reasons the approach of separate locational criteria for specific facility types has been rejected, albeit with certain elements progressed to inform the Pre-Submission approach to

the Policy.
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## 5.2.4 Proposed Mitigation Measures / Recommendations

No mitigation measures have been recommended.

## 5.3 Policy 6: Open Waste Facilities

	Sustainability Objectives (SO)												
	1	2	3	4	5	6	7	8	9	10	11	12	13
Short Term	0	0	0	++	0	0	/	0	++	++	0	+	+
Medium Term	0	0	0	++	0	0	/	0	++	++	0	+	+
Long Term	0	0	0	++	0	0	/	0	++	++	0	+	+

There will be significant positive impacts resulting from the Policy's approach to open waste facilities on the sustainable use of land (SO4) and transport (SO10) through co-location and a focus on brownfield land; and the sustainable management of waste (SO9) through the assessment of sites on their individual merits in line with changing needs.

There will also be minor positive impacts on economic growth / job creation (SO13) through the majority of locational criteria focusing open sites in existing industrial areas. Minor positive impacts will also be realised on public nuisance and access (SO12) through the utilisation of existing infrastructure and a general presumption against sites in previously undeveloped areas.

Uncertainty has been predicted regarding transport related air quality (SO7) due to many facilities being compatible with, and suitable within, existing industrial areas that may already experience large movements of vehicles.

### 5.3.1 Temporal Effects

There will be no temporal effects as a result of this Policy.

### 5.3.2 Secondary, Cumulative and Synergistic Effects

There will be secondary positive impacts on biodiversity (SO1), cultural heritage (SO5), landscape (SO6), and health and well-being (SO11) resulting from the majority of criteria responding to co-location, existing industrial sites, redundant farm buildings and brownfield land.

### 5.3.3 Alternatives Considered

- Alternative 1: To have separate location criteria for the open (air) waste facilities of, outdoor composting (Alternative 1A); Waste Water Treatment Works (Alternative 1B); and inert waste recycling (Alternative 1C).

	Sustainability Objectives (SO)												
	1	2	3	4	5	6	7	8	9	10	11	12	13
Alternative 1A	/	0	0	++	/	+	0	0	++	/	0	/	+
Alternative 1B	0	+	/	++	0	0	0	0	++	+	0	+	+



<b>Alternative 1C</b>	0	0	0	++	0	0	++	0	++	++	0	/	+
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Reasons for rejection: Although the alternative is not significantly different from the Preferred Approach (2015) approach, the changes made can be considered a more flexible approach. The alternative could be considered as more restrictive, limiting certain facilities to specific types of site and the Preferred Approach (2015) instead seeks to direct them to broadly acceptable locations and on their own merits. For these reasons the approach has developed. Although the alternative is not significantly different from the impacts predicted for the Pre-Submission policy approach, the single approach to open waste facilities can be considered a more flexible approach. The alternative could be considered as more restrictive, limiting certain facilities to specific types of site and the preferred Policy approach instead seeks to direct them to broadly acceptable locations and determine them on their own merits. For these reasons the approach of separate locational criteria for specific facility types has been rejected, albeit with certain elements progressed to inform the Pre-Submission approach to the Policy.

### 5.3.4 Proposed Mitigation Measures / Recommendations

No mitigation measures have been recommended.

## 5.4 Policy 7: Nuclear Waste Treatment and Storage at Bradwell-on-Sea

	Sustainability Objectives (SO)												
	1	2	3	4	5	6	7	8	9	10	11	12	13
<b>Short Term</b>	0	0	0	++	0	0	0	0	++	++	0	0	+
<b>Medium Term</b>	0	0	0	++	0	0	0	0	++	++	0	0	+
<b>Long Term</b>	0	0	0	++	0	0	0	0	++	++	0	0	+

There will be significant positive impacts associated with the sustainable use of land (SO4) and the sustainable management of waste (SO9) through the criterion of storage only being acceptable within the Nuclear Licensed Areas at Bradwell. There will also be significant positive impacts regarding the sustainable transportation of waste (SO10) where VLLW, LLW and ILW would be received, stored and processed at source.

There will be a minor positive impact on economic growth (SO13) through the Policy considering Bradwell's selection as a Nationally Significant Infrastructure Project for future nuclear power generation.

### 5.4.1 Temporal Effects

There will be no temporal effects resulting from this Policy.

### 5.4.2 Secondary, Cumulative and Synergistic Effects

There will be secondary, or indirect positive impacts on biodiversity (SO1), water quality (SO2) and flooding (SO3) where the Policy seeks to minimise any adverse impacts on the environment. There will also be positive secondary impacts on health and well-being (SO11) and nuisance and access (SO12) through the approach to minimising the impacts on human health associated with minimising impacts. These impacts will be minimised in accordance with the same site assessment criteria and method used for selecting allocated sites within the Plan, as set out in the additional

### 5.4.3 Alternatives Considered

The following reasonable alternative was considered, along with its reason for rejection:

- Alternative 1: Permission for nuclear or radioactive waste (except low level clinical waste) will not be favoured and the Councils will seek to ensure that any nuclear wastes continue to be disposed of and/or reprocessed at appropriate national facilities (Issues and Options 2010)

	Sustainability Objectives (SO)												
	1	2	3	4	5	6	7	8	9	10	11	12	13
<b>Alternative 1</b>	/	0	0	+	0	+	/	0	/	/	0	0	0
Reasons for rejection: Although not necessary to allocate new sites to deal with non-nuclear VLLW, the Plan must still set out the means by which new facilities would be assessed. The alternative can be considered an inflexible approach in line with the possibility that Bradwell is selected as a Nationally Significant Infrastructure Project for future nuclear power generation. For this reason, the alternative was rejected.													

### 5.4.4 Proposed Mitigation Measures / Recommendations

No mitigation measures have been recommended.

## 5.5 Policy 8: Non-Nuclear Very Low-Level and Low-Level Radioactive Waste

	Sustainability Objectives (SO)												
	1	2	3	4	5	6	7	8	9	10	11	12	13
<b>Short Term</b>	0	0	0	++	0	0	0	0	++	0	0	0	+
<b>Medium Term</b>	0	0	0	++	0	0	0	0	++	0	0	0	+
<b>Long Term</b>	0	0	0	++	0	0	0	0	++	0	0	0	+

There will be significant positive impacts associated with the sustainable use of land (SO4) and the sustainable management of waste (SO9) through the requirements to identify a need to manage waste arising from within Essex and Southend-on-Sea in the first instance, alongside proposed developments (including landfill) demonstrating that they are the most appropriate and acceptable development in relation to the Waste Hierarchy.

There will be minor positive impacts on waste related employment opportunities (SO13) through the Policy's flexibility in being positioned to respond to any proven need, where adequately demonstrated, for non-nuclear LLW and VLLW facilities within the Plan Area and in line with the Spatial Strategy.

### 5.5.1 Temporal Effects

There will be no temporal effects resulting from this Policy.

### 5.5.2 Secondary, Cumulative and Synergistic Effects

There will be secondary, or indirect positive impacts on biodiversity (SO1), water quality (SO2) and flooding (SO3) where the Policy seeks to minimise any adverse impacts on the environment. There will also be positive secondary impacts on health and well-being (SO11) and nuisance and access (SO12) through the approach to minimising the impacts on human health associated with minimising impacts.

### 5.5.3 Alternatives Considered

- Alternative 1a: Permission for nuclear or radioactive waste disposal (except low level clinical waste) will not be granted and the Councils will seek to ensure that any nuclear wastes continue to be disposed of and/or reprocessed at appropriate national facilities.
- Alternative 1b: Assess the potential of existing non-hazardous landfill sites within the Plan Area for disposal of certain LLW and VLLW.

	Sustainability Objectives (SO)												
	1	2	3	4	5	6	7	8	9	10	11	12	13
<b>Alternative 1a</b>	/	0	0	+	0	+	/	0	/	/	0	0	0
Reasons for rejection: A Government commissioned report (Data collection on solid low-level waste from the non-nuclear sector DECC [2008]) stated that this waste stream is likely to reduce over the Plan period, and because there was sufficient capacity nationally to treat the non-nuclear LLW arising in Essex and Southend-on-Sea, there is no requirement to make further provision for non-nuclear radioactive waste facilities. This has previously been the stance taken by the Plan throughout the plan-making process and was explored initially at the Issues and Options (2010) stage; however, in order for the Waste Local Plan to be able to respond to any changing circumstances, it has been considered that a requirement exists to set out a policy stance on non-nuclear LLW and VLLW. For this reason, the alternative has since been rejected.													
	Sustainability Objectives (SO)												
	1	2	3	4	5	6	7	8	9	10	11	12	13
<b>Alternative 1b</b>	/	0	0	+	0	+	/	0	/	/	0	0	0
Reasons for rejection: The alternative to assess the potential of existing non-hazardous landfill sites within the Plan Area for the disposal of certain LLW and VLLW has been rejected as a single method for the management of this waste, with a separate policy having been formulated to deal with locational criteria for landfill proposals. The approach to only consider the potential of existing non-hazardous landfill sites within the Plan Area for disposal of certain LLW and VLLW can be seen as inflexible in regards to the possibility of capacity being needed to manage this waste stream.													

### 5.5.4 Proposed Mitigation Measures / Recommendations

No mitigation measures have been recommended.

## 5.6 Policy 9: Waste Disposal Facilities

	Sustainability Objectives (SO)												
	1	2	3	4	5	6	7	8	9	10	11	12	13
Short Term	+	0	0	++	0	++	0	++	++	+	+	0	0
Medium Term	+	0	0	++	0	++	0	++	++	+	+	0	0
Long Term	+	0	0	++	0	++	0	++	++	+	+	0	0

There will be significantly positive impacts on the sustainable management of waste (SO9) through the Policy's criteria and flexibility to ensure that capacity exists over the Plan Period for the landfilling of waste. There will also be significantly positive impacts on the sustainable use of land / agricultural land (SO4), and landscapes (SO6) through the benefits of landfill of the appropriate materials for restoration purposes. Further significant positive impacts will be realised on energy (SO8) where applicants would have to demonstrate how proposals for non-inert landfill are required to demonstrate the capture of landfill gas for energy generation by the most efficient means.

There will be minor positive impacts on biodiversity (SO1), transport (SO10) and health and well-being (SO11) where any proposals that come forward on land use types not identified above will be assessed on their merits, based on the policies in the adopted RWLP.

### 5.6.1 Temporal Effects

There will be no temporal effects resulting from this Policy.

### 5.6.2 Secondary, Cumulative and Synergistic Effects

There will be significant positive impacts associated with the sustainable management of waste (SO9) and landscape (SO6) with this Policy's stance in accumulation with the plan's policy stance on Landraising (Policy 13).

### 5.6.3 Alternatives Considered

- Alternative 1: Location for landfill - void space within allocated mineral sites only
- Alternative 2: Location for landfill - within extensions to existing landfill facilities
- Alternative 3: To have separate locational criteria for the landfill requirements of, Inert landfill (Alternative 3A); non-hazardous landfill (Alternative 3B); and hazardous landfill (Alternative 3C)
- Alternative 4: To state different criteria for the landfill proposals of different types of waste

	Sustainability Objectives (SO)												
	1	2	3	4	5	6	7	8	9	10	11	12	13
Alternative 1	/	+	/	++	+	+	/	/	++	+	+	+	0
Reasons for rejection: It was considered that this approach would not be viable as it could conflict with the restoration proposals and requirements of minerals sites in the Adopted MLP. As such it was rejected for this purpose.													

<b>Alternative 2</b>	/	+	/	+	/	/	/	/	+	+	/	/	+
<p>Reasons for rejection: This alternative would be dependent upon mineral extraction preceding landfilling. Extending a landfill that is not associated with mineral extraction would not be preferable to filling existing void spaces that require it for restoration. However, in reality most allocated inert landfill sites are extensions either to existing landfill or mineral sites (on the proviso that mineral extraction is feasible in the first instance) and so this approach is not as dissimilar to the Policy as it may seem. As a sole approach however it was rejected, with elements progressed to the preferred Policy approach and Site Assessment Criteria.</p>													
<b>Alternative 3A</b>	0	0	0	++	0	++	0	0	+	+	0	0	0
<b>Alternative 3B</b>	+	0	0	++	+	++	0	++	++	0	+	+	0
<b>Alternative 3C</b>	+	0	0	++	+	++	0	0	++	0	+	+	0
<p>Reasons for rejection: It was considered limiting and inflexible to have separate criteria for non-allocated landfill sites. Proposals for a specific type of landfill may be compatible with extensions for existing landfill for another type. The approach could also be seen to be in conflict with elements of the spatial strategy and the proximity principle; where landfill capacity of a certain type may be required in more specific broad locations than this approach could deliver. For these reasons the alternative was rejected.</p>													
<b>Alternative 4</b>	+	0	0	++	0	++	0	++	++	+	+	0	0
<p>Reasons for rejection: The Revised Preferred Approach (2015) explored an amalgamated approach to landfill, incorporating elements of the 2011 Preferred Approach. Since consultation on the revised Preferred Approach (2015), the Policy has progressed from stating different criteria for landfill proposals of different types of waste. Despite this, the impacts highlighted in the SA of both the Revised Preferred Approach (2015) and Policy 9 are similar, and the implementation of each is not distinctly different. Despite this, the Revised Preferred Approach (2015) can be considered less flexible than that of Policy 9 in the Pre-Submission Plan and for that reason was rejected.</p>													

#### 5.6.4 Proposed Mitigation Measures / Recommendations

No mitigation measures have been recommended.

## 6 Development Management Policies

### 6.1 Policy 10: Development Management Criteria

	Sustainability Objectives (SO)												
	1	2	3	4	5	6	7	8	9	10	11	12	13
Short Term	++	++	+	+	++	++	+	0	0	++	++	++	0
Medium Term	++	++	+	+	++	++	+	0	0	++	++	++	0
Long Term	++	++	+	+	++	++	+	0	0	++	++	++	0

Significant positive impacts will be realised for the historic environment (SO5) where waste management development proposals will only be acceptable where it can be demonstrated that the development would not have an unacceptable impact on the historic environment including heritage and archaeological assets and their settings. Further significant positive impacts will be realised regarding landscape character (SO6) regarding the appearance, quality and character of the landscape, countryside and visual environment and any local features that contribute to its local distinctiveness.

There will be significant positive impacts on health and well-being (SO11) through the Policy's stance on Public Open Space, the definitive Public Rights of Way network and outdoor recreation facilities. Further significant impacts will be realised for public nuisance and access (SO12) through avoiding unacceptable impacts on local amenity (including noise levels, odour, air quality, dust, litter, light pollution and vibration).

There will also be significant positive impacts on water quality (SO2) through the Policy's approach to avoiding unacceptable impacts on the quality and quantity of water within water courses, groundwater and surface water. Similarly there will be significant positive impacts on transport (SO10) through the Policy's stance on the safety and capacity of the road and other transport networks.

It was stated in the SA of the Revised Preferred Approach (2015) that there will be positive impacts on biodiversity (SO1) but despite this, negative impacts of proposals could be experienced on Natura 2000 sites within certain distances. It added that the Habitats Regulations Assessment (HRA) stressed that the flexible approach of the Plan could result in negative impacts on Natura 2000 sites, particularly in accumulation with other developments, plans and programmes within the Plan Area over the plan period. The Pre-Submission Policy has factored in this recommendation, and also the recommendation of the HRA in including a requirement that proposals for waste management facilities will have to demonstrate that they would not have an unacceptable impact on internationally, nationally or locally designated sites. The supporting text, in elaborating on what would be required to demonstrate this, includes the possible need for project-level HRA to accompany certain schemes in certain locations. The Policy, as a result, will now have significant positive impact on biodiversity (SO1).

There will be minor positive impacts on flooding (SO3) through the Policy's stance on the capacity of existing drainage systems. There will also be minor positive impacts on the sustainable use of land, soils and agricultural land (SO4) where waste management development proposals will only be acceptable where they avoid unacceptable impacts on agricultural land, in particular loss of Grades 1, 2 or 3a agricultural land.

It was also stated in the SA of the Revised Preferred Approach (2015) that there will be an uncertain impact on air quality (SO7) where air quality issues were not directly covered. The policy has since been amended to include air quality, resulting in a minor positive impact.

### 6.1.1 Temporal Effects

There will be no temporal effects resulting from this Policy.

### 6.1.2 Secondary, Cumulative and Synergistic Effects

There will be no secondary, cumulative or synergist effects resulting from this Policy.

### 6.1.3 Alternatives Considered

- Alternative 1: To have separate policies on the following development management issues – Health Impact Assessments, landscape and townscape, and biodiversity.
- Alternative 2: To adopt the Revised Preferred Approach (2015) criteria and policy content

	Sustainability Objectives (SO)												
	1	2	3	4	5	6	7	8	9	10	11	12	13
<b>Alternative 1</b>	++	+	+	+	/	++	+	/	/	/	++	+	/
Reasons for rejection: Analysis of the consultation responses, the Annual Monitoring Report, Waste Local Plan policies, and input from Development Management officers indicated that rationalising policy into a single preferred approach dealing with DM issues would be most appropriate. The criteria put forward were selected with the aim of addressing all of the key issues without unnecessary repetition. Thus this alternative of multiple single policy issues was rejected.													
	Sustainability Objectives (SO)												
	1	2	3	4	5	6	7	8	9	10	11	12	13
<b>Alternative 2</b>													
Reasons for rejection: The range of criteria stated in the Policy is similar to the Previous Revised Preferred Approach (2016) approach to development management criteria. Despite this, the Pre-Submission Policy elaborates on certain issues and criteria, predominantly in the supporting text, offering a stronger and more sustainable stance on issues such as transport networks, air quality and water quality. Notably the Policy also has an increased focus on protecting internationally, nationally and locally designated wildlife sites, with an notable inclusion that proposals may be required to be accompanied with a project-level HRA in certain instances and within specific distances, which was lacking and a criticism of the Revised Preferred Approach (2015) approach. As such, the Policy approach has been selected in favour of the approach espoused in the Revised Preferred Approach (2015), which has since been rejected.													

### 6.1.4 Proposed Mitigation Measures / Recommendations

The SA of the Revised Preferred Approach (2015) recommended that, ‘the supporting text highlights the range of sites with international designation in the Plan Area, and recognises the fact that the impacts of development on biodiversity should be fully understood; however it is recommended that this Policy, or the supporting text, be expanded to reflect the possibility of impacts on Natura 2000 sites in line with the findings of the HRA. The policy could be more specific as to the possible requirements of the developer to, in accompaniment to any planning application, undertake project-level HRA or Appropriate Assessment to ascertain the implications of development on such designations and in accumulation with other developments, plans and programmes in the Plan Area.’ The WPAs, through Policy 10, have factored in this

recommendation, and the approach has been amended accordingly. The policy now includes that proposals for waste management facilities will have to demonstrate that they would not have an unacceptable impact on internationally, nationally or locally designated sites and the supporting text, in elaborating on what would be required to demonstrate this, includes the possible need for project-level HRA to accompany certain schemes in certain locations.

## 6.2 Policy 11: Mitigating and Adapting to Climate Change

	Sustainability Objectives (SO)												
	1	2	3	4	5	6	7	8	9	10	11	12	13
Short Term	0	++	++	0	/	/	++	++	+	++	+	0	0
Medium Term	0	++	++	0	/	/	++	++	+	++	+	0	0
Long Term	0	++	++	0	/	/	++	++	+	++	+	0	0

There will be significant positive impacts on water quality (SO2) where proposals for new waste management facilities should incorporate water efficient design measures. Similarly, proposals will not be permitted where they fail to demonstrate that there would not be an unacceptable risk to the quantity and quality of surface water and groundwaters, or impediment to groundwater flow. As well as aiming to ensure that emissions are reduced, there will be significant positive impacts on flood risk (SO3) where proposals will only be permitted where there would not be an unacceptable risk of flooding on site or elsewhere and where existing and proposed flood defences are protected. Proposals should also set out their use of sustainable drainage systems where applicable.

There will be significant positive impacts resulting from this Policy on air quality (SO7) through a commitment to reduce carbon emissions directly from waste management facilities in construction and operation, as well as regarding associated transport movements. This also applies for renewable energy generation (SO8) through proposals being required to set out how they support opportunities for decentralised and renewable or low-carbon energy supply, a requirement to minimise carbon emissions through energy efficient design measures and the requirements included within section 3 of the policy for all those proposals capable of producing energy or a fuel from waste. Section 3 of the policy is a new inclusion at this stage of the Plan and is viewed as clearly setting out the requirements of proposals for the purpose of maximising energy production from waste activities and exploring it in all relevant proposals. This is viewed as a more sustainable approach than previous iterations of this Policy. There will also be significant positive impacts on transport (SO10) where proposals for new waste facilities should set out how the location and transportation related to the development will limit carbon emissions, as well as incorporating proposals for sustainable travel including travel plans where appropriate.

There will be minor positive impacts on the sustainable management of waste (SO9) through increasing the energy efficiency of waste management facilities that are adaptable to future climatic conditions, and the recovery of energy in relevant instances. The Policy is unlikely to impact on moving waste management up the waste hierarchy in the Plan Area, thus positive impacts are limited. There will be positive impacts on health (SO11) in so far as a reduction in carbon emissions from waste management facilities will minimise any related air quality issues. This has impacts on human health; however the policy is not relevant to the rest of this objective's criteria.

Uncertain impacts are predicted on the historic environment (SO5) and landscape character (SO6) where design measures specific to energy and water efficiency may not be compatible with nearby historical assets or local landscape features, and the implementation may be difficult in certain circumstances. Despite this, negative impacts are unlikely to occur as a result of the wider strategy



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and are effectively neutralised by the criteria of Policy 10.

### 6.2.1 Temporal Effects

There will be no temporal effects resulting from this Policy.

### 6.2.2 Secondary, Cumulative and Synergistic Effects

There will be secondary positive impacts on biodiversity (SO1) through a reduction in carbon emissions and the impacts on water bodies (SO2) and reduced flood risk (SO3) which can impact negatively on species and habitats. Similarly, there will be a secondary positive impact on public nuisance and access (SO12) through a reduction in emissions that could affect local and neighbouring developments were this Policy not implemented. Similarly, the indirect impacts on neighbouring uses in regards to flood risk and access arrangements should also be positive through detailed criteria to minimise flooding and travel plans where appropriate.

### 6.2.3 Alternatives Considered

There have been no distinctively alternative approaches developed for mitigating and adapting to climate change. It is considered that no possible alternative approaches could be deemed reasonable for the purposes of the SA. Any alternative approaches would not reflect national policy requirements of WPAs in formulating a Waste Local Plan or the evidence base of the Plan itself.

### 6.2.4 Proposed Mitigation Measures / Recommendations

No mitigation measures have been recommended.

## 6.3 Policy 12: Transport and Access

	Sustainability Objectives (SO)												
	1	2	3	4	5	6	7	8	9	10	11	12	13
Short Term	0	0	0	0	0	0	+	0	0	++	0	+	0
Medium Term	0	0	0	0	0	0	+	0	0	++	0	+	0
Long Term	0	0	0	0	0	0	+	0	0	++	0	+	0

There will be significant positive impacts on transport (SO10) through seeking opportunities for the transportation of waste by rail or water in the first instance. It should be acknowledged that the use of rail or water in transporting waste may result in an increase in the distance waste travels, due to the nature of the required infrastructure, however these are more sustainable options in terms of both emissions and congestion. This increase in waste miles via rail or wharf transshipment facilities may result in more cross boundary movements, however the approach strikes a good balance between increasing sustainable transportation within the realms of what is practicable in terms of cost and impacts on the road infrastructure. The Policy accepts that road infrastructure is still likely to be utilised predominantly for the transportation of waste in the Plan Area, and addresses this with a hierarchical approach to access arrangements so as not to significantly impact on local roads and the general population. The Policy is therefore a viable and realistic approach.

Additionally there will be a minor positive impact on minimising public nuisance / access (SO12) through an approach to waste transportation that seeks to, in part, minimise situations where

HGVs will directly impact on local residential amenity. There will also be positive impacts on air quality (SO7) through seeking opportunities for the transportation of waste by rail or water in the first instance. It is felt that a large number of the Sustainability Objectives are better covered in other Policies regarding the locational criteria of facilities and the development management criteria stated in Policy 10.

### 6.3.1 Temporal Effects

There will be no temporal effects resulting from this Policy.

### 6.3.2 Secondary, Cumulative and Synergistic Effects

There will be no secondary, cumulative or synergistic effects resulting from this Policy.

### 6.3.3 Alternatives Considered

- Alternative 1: An approach of seeking to reduce transport distances by taking account of where the majority of waste arises and the destination of recycled, treated and recovered outputs and residual waste for disposal (with an additional focus on regional interchange centres and inter-urban/intra-urban routes with existing capacity as defined by the main highway network)

	Sustainability Objectives (SO)												
	1	2	3	4	5	6	7	8	9	10	11	12	13
<b>Alternative 1</b>	+	0	0	0	+	+	+	0	0	++	+	+	/
Reasons for rejection: The alternative was considered too broadly focused on the location of facilities in line with the proximity principle. This approach would result in very few facilities being appropriate or available in line with the spatial strategy and the capacity gap requirements of the Plan. For these reasons, the alternative was rejected in favour of an approach that additionally factors in the suitability of access into and out of any site and the nature of the roads that the vehicles use in line with local Route Hierarchy Plans relevant to the Plan Area.													

### 6.3.4 Proposed Mitigation Measures / Recommendations

No mitigation measures have been recommended.

## 6.4 Policy 13: Landraising

	Sustainability Objectives (SO)												
	1	2	3	4	5	6	7	8	9	10	11	12	13
<b>Short Term</b>	++	+	+	++	+	++	0	0	++	0	+	0	++
<b>Medium Term</b>	++	+	+	++	+	++	0	0	++	0	+	0	++
<b>Long Term</b>	++	+	+	++	+	++	0	0	++	0	+	0	++

There are likely to be positive impacts on biodiversity (SO1), the sustainable use of land and agricultural land (SO4), landscape (SO6) and sustainable waste management (SO9) where landraising would only be acceptable for the restoration of mineral extraction sites or for essential

engineering projects or where it would provide a significant improvement to damaged or degraded land and/or provide a greater environmental or agricultural land value than the previous land use.. This would also see positive impacts on economic growth through the approach’s acknowledgement of the need for inert material for infrastructure projects.

A range of minor positive impacts will additionally be realised due to the approach’s restrictions regarding the use of inert material for landraising. This approach will limit the potential negative impacts on water quality (SO2), flooding (SO3), the historic environment (SO5) and well-being (SO11) by ensuring that landraising occurs only where necessary and not to the detriment of these factors as could otherwise be expected with a less restrictive stance.

### 6.4.1 Temporal Effects

There will be no temporal effects as a result of this Policy at this stage. The Sustainability Appraisal of the potential criteria for a landraising policy in the WDD Issues and Options (2010) document highlighted long term significant positive impacts associated with biodiversity, landscape and the sustainable use of land (SO1, SO6 and SO4) only due to the restoration implications of landraising, however these have been extended into the short and mid-term due to ECC, as the MPA, having a recently adopted Minerals Local Plan in addition to the need for the restoration of historic landfill sites.

### 6.4.2 Secondary, Cumulative and Synergistic Effects

There are likely to be positive cumulative and synergistic impacts on the majority of the Sustainability Objectives through all inert landfill and landraise proposals having to meet the policies in the RWLP once adopted. In addition, there will be significant positive impacts associated with the sustainable management of waste (SO9) and landscape (SO6) with this Policy’s stance in accumulation with the plan’s policy stance on Waste Disposal (Policy 9).

### 6.4.3 Alternatives Considered

- Alternative 1: To adopt a less restrictive ‘locational criteria’ based approach to landraising - Revised Preferred Approach stage (2015)

	Sustainability Objectives (SO)												
	1	2	3	4	5	6	7	8	9	10	11	12	13
<b>Alternative 1</b>	-	0	0	-	0	-	0	0	-	/	0	0	0
Reasons for rejection: The alternative would not reflect the recycling of inert material as defined within the Waste Hierarchy. In addition, there would be less material available that would be required for restoration purposes; of great benefit and importance within the Plan Area in respect of existing mineral voids and the Plan’s approach to Waste Disposal (Policy 9).													

### 6.4.4 Proposed Mitigation Measures / Recommendations

No mitigation measures have been recommended

## 6.5 Policy 14: Landfill Mining and Reclamation

	Sustainability Objectives (SO)												
	1	2	3	4	5	6	7	8	9	10	11	12	13
Short Term	+	+	0	0	0	0	0	+	+	0	+	0	+
Medium Term	+	+	0	0	0	0	0	+	+	0	+	0	+
Long Term	/	/	/	/	/	/	/	/	/	/	/	/	/

There will be no significant impacts on any of the Sustainability Objectives through this Policy. There will be minor positive impacts on biodiversity (SO1), water quality (SO2), energy generation (SO8), the sustainable management of waste (SO9), human health (SO11) and economic growth (SO13) through the approach to only permit the mining of waste in instances of sites endangering human health or the environment, or where required to facilitate major infrastructure projects and where there would be additional energy yield. These impacts will not extend into the long term.

### 6.5.1 Temporal Effects

The long term effects of this Policy are uncertain. This surrounds any newly created void space from mining and these locations may or may not be suitable or sustainable for landfill in line with modern requirements and the Site Assessment Methodology of the RWLP. The Plan states that any widespread re-working could affect the perceived lifetime of sites. Currently landfills are temporary use of land, which would be returned to another use, whether this be for agriculture, biodiversity or local amenity. If old sites are re-opened, this may (re)introduce blight into the area.

### 6.5.2 Secondary, Cumulative and Synergistic Effects

There may be long term negative synergistic impacts on the Plan's Spatial Strategy where the mining of waste could create new void space for landfill that do not conform to the Spatial Strategy and requirements of void space to serve particular areas / key centres of growth.

### 6.5.3 Alternatives Considered

- Alternative 1: To not have a policy on the mining of waste - Revised Preferred Approach (2015)

	Sustainability Objectives (SO)												
	1	2	3	4	5	6	7	8	9	10	11	12	13
Alternative 1	/	/	0	0	0	0	0	0	0	0	/	0	/

Reasons for rejection: Although in the shorter term it is difficult to see how the reworking of general landfills, notably those containing municipal solid waste, could yield worthwhile revenue to offset the costs (including environmental assessments, securing planning and other consents and any necessary mitigation), the RWLP must remain flexible. As such, this alternative was rejected in favour of including a policy on the mining of waste.

### 6.5.4 Proposed Mitigation Measures / Recommendations

No mitigation measures have been recommended.

## 7 Conclusions

### 7.1 The Vision, Strategic Objectives and Spatial Strategy

	Sustainability Objectives (SO)												
	1	2	3	4	5	6	7	8	9	10	11	12	13
Vision	+	+	+	+	+	+	+	+	++	+	+	+	+
Strategic Objs	+	0	0	++	0	/	+	++	++	+	++	+	++
Spatial Strategy	/	/	/	+	/	/	/	/	++	++	/	/	++

- The Vision focuses on waste management, and as such the only significant effect will be realised for Sustainability Objective 9 (defined as ‘to ensure the sustainable management of waste landfilled, to maximise the re-use, recovery and recycling of waste and to promote the minimisation of waste produced at source’). The Vision strongly adheres to this objective through a commitment to the specifics of the Waste Hierarchy without disregarding the Plan Area’s key issues and requirements.
- The Strategic Objectives will have significant positive impacts on SO4 (to maximise the sustainable use of land and the protection of soils, safeguarding the best and most versatile agricultural land), SO8 (to maximise energy efficiency, the proportion of energy generated from renewable sources and adaptability to climate change); SO9 (to ensure the sustainable management of waste landfilled, to maximise the re-use, recovery and recycling of waste and to promote the minimisation of waste produced at source); SO11 (to protect human health and well-being and maintain the quality and quantity of public open space amenity across Essex and Southend); and SO13 (to maximise opportunities for economic development, including jobs, arising from waste related activities). There is a single uncertain impact on landscape and townscape character (SO6) where it is unclear whether this issue is covered under ‘general amenity’. It should be acknowledged however that there will be indirect positive impacts on a number of the Sustainability Objectives assessed as having ‘no impact’.
- The Spatial Strategy will have significant positive impacts on the sustainable management of waste (SO9), the sustainable transportation of waste (SO10) and economic growth (SO13) in line with commitments to allocating and safeguarding strategic sites, a network of LACW transfer stations and a general distribution focused on key centres for growth.

#### 7.1.1 Recommendations Regarding the Proposed Vision, Strategic Objectives and Spatial Strategy

- There is scope for the Strategic Objectives to cover landscape, townscape and the historic environment more clearly, possibly within Strategic Objective 8, where the issue is not directly relevant to environmental or amenity concerns.

## 7.2 The Policies (Excluding Strategic Allocations [Policy 3])

	Sustainability Objectives (SO)												
	1	2	3	4	5	6	7	8	9	10	11	12	13
Policy 1	0	0	0	0	0	0	0	0	++	0	0	0	0
Policy 2	/	/	/	+	/	/	/	+	++	+	+	+	++
Policy 4	0	/	0	+	0	0	/	0	++	+	0	0	/
Policy 5	0	0	0	++	0	0	/	++	++	++	0	+	+
Policy 6	0	0	0	++	0	0	/	0	++	++	0	+	+
Policy 7	0	0	0	++	0	0	0	0	++	++	0	0	+
Policy 8	0	0	0	++	0	0	0	0	++	0	0	0	+
Policy 9	+	0	0	++	0	++	0	++	++	+	+	0	0
Policy 10	++	++	+	+	++	++	+	0	0	++	++	++	0
Policy 11	0	++	++	0	/	/	++	++	+	++	+	0	0
Policy 12	0	0	0	0	0	0	+	0	0	++	0	+	0
Policy 13	++	+	+	++	+	++	0	0	++	0	+	0	++
Policy 14	+	+	0	0	0	0	0	+	+	0	+	0	+

- The Plan's policies, excluding Policy 3 which looks at Strategic Site Allocations and has been explored separately, will have significant positive impacts on all of the Sustainability Objectives. Most clearly, they can be seen to adhere to the Plan's principle aim; that being the sustainable management of waste (SO9) in the Plan Area.
- The Plan will also have a large number of significant positive impacts on the sustainable use of land, predominantly as a result of the Plan's locational criteria policies.
- The Plan's general approach to the sustainable transportation of waste, emanating through the majority of Policies, will also give rise to a large number of significantly positive impacts.
- The Plan can be seen to have a comparatively large amount of uncertain impacts on Sustainability Objective 7, regarding air quality. This is due to the Plan's approach to co-location of waste management facilities with non-waste development, predominantly resulting from the Areas of Search and locational criteria. This is due to the possibility of existing industrial areas, the preferred locations identified as suitable for such co-location, already experiencing large movements of vehicles. It should be acknowledged however, that the principle of development, including waste development as a compatible and similar use to industrial uses, is already established and designed on such sites.

### 7.2.1 Recommendations Regarding the Policies (Excluding Strategic Allocations)

One recommendation has been made to the Plan's Strategic Objectives. This is:

- Strategic Objectives - There is scope for the Strategic Objectives to cover landscape, townscape and the historic environment more clearly, possibly within Strategic Objective 8, where the issue is not directly relevant to environmental or amenity concerns. Despite this

though the SA is satisfied that these issues are sufficiently covered in other Plan Policies and also through the site assessment methodology used to select appropriate sites.

There are no other recommendations to any of the Policies at this stage. Recommendations have been factored into the Plan at various stages of the SA and plan-making process. These are highlighted below:

- Policy 10 - The SA of the Revised Preferred Approach (2015) recommended that, ‘the supporting text highlights the range of sites with international designation in the Plan Area, and recognises the fact that the impacts of development on biodiversity should be fully understood; however it is recommended that this Policy, or the supporting text, be expanded to reflect the possibility of impacts on Natura 2000 sites in line with the findings of the HRA. The policy could be more specific as to the possible requirements of the developer to, in accompaniment to any planning application, undertake project-level HRA or Appropriate Assessment to ascertain the implications of development on such designations and in accumulation with other developments, plans and programmes in the Plan Area.’ The WPAs, through Policy 10, have factored in this recommendation, and the approach has been amended accordingly. The policy now includes that proposals for waste management facilities will have to demonstrate that they would not have an unacceptable impact on internationally, nationally or locally designated sites and the supporting text, in elaborating on what would be required to demonstrate this, includes the possible need for project-level HRA to accompany certain schemes in certain locations.

### 7.3 The Strategic Site Allocations (Policy 3)

The following table shows the sustainability impacts of the strategic site allocations of the Plan.

Sites for: BIOLOGICAL WASTE MANAGEMENT														
Site Ref.	Temp Effect	Sustainability Objectives (SO)												
		1	2	3	4	5	6	7	8	9	10	11	12	13
W29 Bellhouse	S / M	/	-	++	++	/	-	/	/	+	+	--	++	++
	L	/	-	++	++	/	-	/	/	+	+	/	++	++
W3 Basildon WWTW	S / M	/	-	/	/	+	/	++	0	++	+	-	++	++
	L	/	-	/	/	+	/	++	0	++	+	/	++	++
W20 Courtauld Road	S / M	/	-	++	/	++	/	++	0	++	+	-	+	++
	L	/	-	++	/	++	/	++	0	++	+	/	+	++
IWMF2 - Rivenhall	S / M	+	-	++	-	++	-	++	++	++	+	--	++	++
	L	+	-	++	-	++	-	++	++	++	+	/	++	++
Sites for: INERT WASTE RECYCLING														
Site Ref.	Temp Effect	Sustainability Objectives (SO)												
		1	2	3	4	5	6	7	8	9	10	11	12	13
W32 Crumps Farm	S / M	/	-	--	-	/	-	/	0	+	+	/	++	+
	L	/	-	--	-	/	-	/	0	+	+	/	++	+

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W8 Elsenham	S / M	+	++	++	/	-	-	/	0	+	+	-	++	/
	L	+	++	++	/	-	-	/	0	+	+	/	++	/
W7 Sandon East	S / M	+	-	--	/	+	+	++	0	++	/	-	+	++
	L	+	-	--	/	+	+	++	0	++	/	/	+	++
L(n)1R Slough Farm	S / M	+	-	++	++	/	/	++	0	+	/	-	+	++
	L	+	-	++	++	/	/	++	0	+	/	/	+	++
L(i)10R Blackley (Site 1)	S / M	+	-	++	++	+	/	++	0	+	+	--	++	++
	L	+	-	++	++	+	/	++	0	+	+	/	++	++
W13 Wivenhoe Quarry	S / M	/	-	++	-	++	/	/	0	++	/	--	+	++
	L	/	-	++	-	++	/	/	0	++	/	/	+	++
W31 Morses Lane	S / M	+	++	++	/	/	/	/	0	++	+	-	++	++
	L	+	++	++	/	/	/	/	0	++	+	/	++	++
L(i)17R Newport Quarry	S / M	/	-	++	-	+	++	++	0	+	/	-	+	+
	L	/	-	++	-	+	++	++	0	+	/	/	+	+
<b>Site for: OTHER WASTE MANAGEMENT</b>														
Site Ref.	Temp Effect	Sustainability Objectives (SO)												
		1	2	3	4	5	6	7	8	9	10	11	12	13
IWMF2 Rivenhall	S / M	+	-	++	-	++	/	++	++	++	+	--	++	/
	L	+	-	++	-	++	/	++	++	++	+	/	++	/
<b>Sites for: INERT LANDFILL</b>														
Site Ref.	Temp Effect	Sustainability Objectives (SO)												
		1	2	3	4	5	6	7	8	9	10	11	12	13
L(n)7R Little Bullocks A22	S / M	/	--	--	++	/	/	/	0	+	+	--	++	+
	L	/	--	--	/	0	/	0	0	0	0	/	0	0
L(n)1R Slough Farm	S / M	+	--	++	++	/	/	++	0	+	/	--	+	++
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
L(i)10 Blackley (Site 1)	S / M	+	--	++	++	+	/	++	0	+	+	--	++	++
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
L(i)6 Sandon	S / M	-	--	--	++	+	/	++	0	++	/	--	++	++
	L	/	--	--	/	0	/	0	0	0	0	/	0	0



L(i)5 Sunnymead	S / M	/	--	++	++	/	++	/	0	+	/	--	+	++
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
L(i)17R Newport Quarry	S / M	/	--	++	-	+	++	++	0	+	/	--	+	+
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
L(n)5 Bellhouse	S / M	/	--	++	++	+	+	/	0	++	+	--	++	++
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
L(i)15 Fingringhoe	S / M	/	--	++	/	+	++	++	0	++	++	--	++	++
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
Sites for: (STABLE NON-REACTIVE) HAZARDOUS WASTE LANDFILL														
Site Ref.	Temp Effect	Sustainability Objectives (SO)												
		1	2	3	4	5	6	7	8	9	10	11	12	13
L(n)8R Little Bullocks	S / M	/	--	++	++	+	-	/	0	+	+	--	++	/
	L	/	--	++	/	0	/	0	0	0	0	/	0	0

- The Strategic Site Allocations can be seen to have a range of positive and negative impacts on the sustainability objectives. Their comparison to alternative sites however indicates that these offer the most sustainable solutions, especially in regard to both capacity gap requirements and conformity to the principles and rationale of the Plan's Spatial Strategy.
- The Strategic Site Allocations have changed since the Revised Preferred Approach (2015). This is largely due to some sites now not being promoted for some specific facility types, the withdrawal of others from the process, the re-assessment of sites in response to the consultation of the Revised Preferred Approach (2015) stage Plan, and also the update to the Waste Capacity Gap Report.
- In focusing on the allocations' negative impacts, most can be seen as individual impacts associated with the nature and principle of waste management facilities, and a cautious approach to assessment regarding the impacts on social indicators and general amenity.
- Particularly, this has responded to negative impacts being predicted for well-being (SO11) should any properties lie within 250m of sites, and also water quality (SO2) where water bodies lie within or adjacent to sites. It should be acknowledged however that individual impacts can often be mitigated on site and those impacts highlighted above do not factor in the development principles stated in Appendix B of the Plan that outline issues and opportunities to be addressed on a site-by-site basis. These principles exist in response to negative impacts highlighted, and have been identified for this reason.

### 7.3.1 Cumulative Impacts of the Strategic Site Allocations by Sustainability Objective

This section looks at the combined impacts of the allocated sites per Sustainability Objective. This goes some way to highlight the cumulative and synergistic impacts of all the sites in total. These impacts are elaborated on and explained in the corresponding commentary. The following table indicates the proportion (and number) of all sites that have a specific impact on each Sustainability

Objective.

**Table 10: Cumulative Impacts of all Preferred Sites by Sustainability Objective**

Sustainability Objectives (SO)	Cumulative Impacts of all Preferred Sites			
1 Biodiversity	9	12		1
2 Water	2	11	9	
3 Flooding	17			1 4
4 Sustainable use of land	10		6	6
5 Cultural Heritage	4	10		7 1
6 Landscape	4	2	11 5	
7 Air Quality	13		5	4
8 Energy	2	1	19	
9 Waste management	10		12	
10 Transport	1	13		8
11 Health & well-being	1	7	14	
12 Nuisance and access	14		8	
13 Economic growth	15		4	3

- As can be seen from the above there will be largely positive impacts from the allocated sites. Despite this, overall water quality (SO2) in the Plan Area could be seen to suffer from the allocations. It should be noted however that many of these impacts will be localised and that development principles, exist within the Plan for each site to ensure that such impacts are appropriately mitigated. In addition, Policy 10 of the Plan has integrated a stronger stance on the protection of water quality, in response to these highlighted impacts.
- A majority proportion of those impacts predicted for landscape quality (SO6) are either uncertain or negative, which translate as moderate to high impacts. The cumulative impact of landscapes in the Plan Area could be seen to deteriorate as a result of the allocations; however again, development principles exist to mitigate such impacts on a site-by-site basis.
- The Plan's allocated sites can be seen to have a large degree of negative impacts on

health and well-being (SO11), associated largely with one or more sensitive receptors (properties) being in close proximity to sites and/or PROWs being on or adjacent to sites. Whilst the extent of these negative impacts appears significant, it should be acknowledged that a single sensitive use being within 250m of the allocation (regardless of facility type) reduced the stated impacts accordingly and in fact such an impact would be capable of mitigation. It should also be acknowledged that, in line with the proximity principle, allocations in close proximity to key centres of growth are invariably more likely to encounter sensitive uses in their vicinity. Development principles exist for all the allocated sites, as specified in Appendix B of the Plan, and these contain a number of measures to protect local amenity. In addition, PROWs will have to be re-routed should they be disrupted and the Environment Agency addresses odour issues through the Pollution regime. As such, the negative impacts highlighted are unlikely to be forthcoming from any of the proposals.

- There will be a significant positive cumulative impact on employment opportunities from waste management (SO13) resulting from the allocated sites' proximity to key towns and centres for growth.

### 7.3.2 Recommendations Regarding the Strategic Site Allocations

There are no recommendations to any of the Sites at this stage. Recommendations have been factored into the Plan at various stages of the SA and plan-making process. These are highlighted below:

- The sites of L(n)8R, L(n)7R and W32 are all in close proximity to each other, and share a lot of impacts as a result. It can be seen that, in addition to there being significant negative impacts on water quality (SO2) as a result of each allocation individually, there may be further cumulative negative impacts on this objective. The Plan however, recognises the shared impacts of these sites, and although grouped and allocated for different facility types within the Plan, looks at them as a suite of allocations. Each site has different development principles in Appendix B of the Plan that are closely linked and relevant to each specific use, but there will be shared common benefits. The need for a hydrological assessment for site L(n)8R ensures that water quality issues are addressed in terms of hazardous landfill operations in the area. Inert recycling at site W32 will have a lesser impact on water quality and has been raised due to the proximity of a water body and can be mitigated through the requirements of Policy 10, which includes added emphasis on potential water quality issues. It is therefore viewed that the recommendation has been sufficiently factored into the Plan, where effective measures to mitigate the impacts on water quality in the area will be sought and adequately addressed.
- The sites of W13, L(i)15 and L(i)5 have been grouped where they are located in a broadly similar location, and also in regard to their possible impacts on biodiversity through the international designation that exists of the Colne Estuary (SPA, Ramsar). In addition to development principles for these sites stating that likely significant effects on the nearby international wildlife sites need to be considered, it should additionally be noted that the Plan, as per the recommendation of the HRA, states that 'planning permission for waste management development within or otherwise affecting an international site (Natura 2000 site) will only be granted where the conclusions of a project-level Habitats Regulations Assessment (HRA), as required for those proposals highlighted within the HRA of the Plan, demonstrate that the proposal will have no adverse impacts on the integrity of any site, either alone or in combination with other plans or projects.' Screening distances are also provided as a guide for potential applicants in relation to the triggers for project-level HRA. The inclusion of this requirement in the Plan will effectively determine whether any impacts

on internationally designated sites are likely. Additionally, project-level HRA will also identify the impacts of proposals in combination with other relevant projects, plans and programmes within the Plan Area. As such there will be no cumulative impacts on biodiversity.

- In the SA of the Revised Preferred Approach (2015) it was recommended that mitigation measures should be incorporated where possible in a forthcoming site related policy post-consultation, due to significant negative impacts having been highlighted for health and well-being (SO11). This was associated with the loss of a PROW and proximity to properties at the W29 Bellhouse site. It should be noted that the development principles stated for this site in the Pre-Submission Plan include those related to hours of operation and noise standards. It should also be noted that the Environment Agency will also address any potential odour issues in the interests of protecting local amenity. It is considered at this stage that the recommendations of the SA have been successfully factored into the Plan.
- In the SA of the Revised Preferred Approach (2015) it was recommended that significant negative impacts associated with flooding (SO3) resulting from W7 Sandon, due to portions of the site being in Flood Zone 3 would require effective mitigation. This issue is sufficiently covered by the Plan's policies. Mitigation was also recommended for L(i)10R regarding the site's negative impact on well-being (SO11) resulting from its location to nearby properties. This has been addressed in the development principles for the site which state that dust mitigation measures, limits on duration (hours of operation) and noise standards (from noise sensitive properties) will be established in the interests of protecting local amenity. The approach taken by the WPAs to cover these issues in policy and development principles can be seen to have successfully factored in the recommendations of the Revised Preferred (2015) stage SA.
- At the Revised Preferred Approach (2015) stage, it was stated that a negative impact on well-being (SO11) will exist for IWMF2 due to the proximity of nearby properties, which will require mitigation. The development principles for the site, as listed in Appendix B of the Plan, state that dust mitigation measures, limits on duration (hours of operation) and noise standards (from noise sensitive properties) will be established in the interests of protecting local amenity. As a result, the recommendation of the AS has been successfully factored into the Plan.
- Site L(n)8R will have a negative impact on well-being (SO11) associated with a small number of properties within 250m of the site boundary. It was stated within the SA of the Revised Preferred Approach (2015) that this impact on sensitive receptors should be mitigated within any forthcoming site policy. It is considered that the development principles formulated for this site as stated in Appendix B of the Plan adequately address this recommendation.

## **8 Monitoring**

The significant sustainability effects of implementing a Local Plan must be monitored in order to identify unforeseen adverse effects and to be able to undertake appropriate remedial action. The Sustainability Framework contained in Annex C accompanying this report contains suggested indicators in order to monitor each of the Sustainability Objectives, however these may not all be collected due to limited resources and difficulty in data availability or collection.

Guidance stipulates that it is not necessary to monitor everything included within the Sustainability Framework, but that monitoring should focus on significant sustainability effects, e.g. those that indicate a likely breach of international, national or local legislation, that may give rise to irreversible damage or where there is uncertainty and monitoring would enable preventative or mitigation measures to be taken.

Upon adoption the Plan will be accompanied by an Adoption Statement which will outline those monitoring indicators most appropriate for future monitoring of the Plan in line with Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004.

## 9 Next Steps – Consulting on the Sustainability Appraisal

This Environmental Report will be subject to consultation. There are three statutory consultees that are required to be consulted for all Sustainability Appraisal and Strategic Environmental Assessment documents. These are:

- The Environment Agency;
- Natural England; and
- English Heritage.

In addition to these, consultation will seek to engage the wider community in order to encompass comprehensive public engagement. Essex County Council and Southend-on-Sea Borough Council may additionally wish to invite comments from focussed groups, relevant stakeholders and interested parties.

All comments on the content of this Environmental Report should be sent to:

Minerals and Waste Planning  
Policy Team  
Essex County Council  
County Hall  
Chelmsford  
Essex  
CM1 1QH

Email: [mineralsandwastepolicy@essex.gov.uk](mailto:mineralsandwastepolicy@essex.gov.uk)

Telephone: 03330 139 808

Comments can also be made in the relevant section of the Council's consultation portal:

<http://consult.essexcc.gov.uk/portal/>.

## 10 Appendix A – Reasons for Selecting Site Allocations in Light of Reasonable Alternatives

This Appendix offers an explanation as to why the Plan’s allocations have been preferred over alternative sites. In the case of alternative sites, the reason for rejection is set out.

**Table 11: Appraisal of sites put forward for Enclosed Waste Facilities: In-vessel composting facilities**

Sites for: IN-VESSEL COMPOSTING FACILITIES														
Site Ref.	Temp Effect	Sustainability Objectives (SO)												
		1	2	3	4	5	6	7	8	9	10	11	12	13
W3	S / M	+	-	/	++	+	++	++	0	++	+	-	++	++
	L	+	-	/	++	+	++	++	0	++	+	/	++	++
Preferred Site – Reason for allocation:		<p>The site scored highly against other sites considered for allocation in the Waste Site Assessment Report. It is also considered suitable to meet the capacity gap requirements and its conformity to the general principles of the Spatial Strategy and the proximity principle. This site is preferred for its suitability for allocation for biological treatment, although the specific facility type has not been determined at this point.</p> <p>An amendment to the impacts previously highlighted in the SA of the Revised Preferred Approach (2015) regarding health and well-being (SO11) on Site W3 (Basildon WWTW) has also been made. This is due to there being sensitive receptors within 250m of the site. As such the previously highlighted uncertain impacts are now judged to be negative. The site is also now recognised as being in FZ2 (previously erroneously judged to be in FZ1 for some uses) which sees an amendment to the impacts highlighted for flooding (SO3) as uncertain, where previously they were considered significantly positive.</p>												
W7	S / M	+	-	--	/	/	+	++	0	++	/	/	+	++
	L	+	-	--	/	/	+	++	0	++	/	/	+	++
Preferred Site – Reason for allocation:		Not allocated for use as biological treatment. Has been allocated in the Plan for another use.												

W8	S / M	+	++	++	/	-	-	/	0	+	+	-	++	/
	L	+	++	++	/	-	-	/	0	+	+	/	++	/
Reason for rejection:		<p>Not allocated for use as biological treatment. Has been allocated in the Plan for another use.</p> <p>An amendment has been made since the SA of the Revised Preferred Approach (2015) regarding historic environment impacts at W8 - Elsenham. Uncertain impacts were previously highlighted for certain facility types due to moderate issues regarding the historic environment (SO5), however a re-assessment of the site has led to a major impact issue (which may be acceptable subject to mitigation) being highlighted for all facility types. As such impacts are now negative.</p>												
W20	S / M	+	-	++	/	++	+	++	0	++	+	-	+	++
	L	+	-	++	/	++	+	++	0	++	+	/	+	++
Preferred Site – Reason for allocation:		<p>The site scored highly against other sites considered for allocation in the Waste Site Assessment Report in consideration also of its suitability to meet the capacity gap requirements and its conformity to the general principles of the Spatial Strategy and the proximity principle. This site is preferred for its suitability for allocation for biological treatment, although the specific facility type has not been determined at this point.</p> <p>An amendment has also been necessary for the impact on water quality (SO2) previously stated on site W20 Courtauld Road. The alteration to the route of the Nevendon Brook now sees it run along the eastern boundary of the proposed site. As such previously significantly positive impacts are now negative due to the proximity of this water body.</p>												
W21	S / M	+	-	--	/	+	--	++	0	+	+	--	++	++
	L	+	-	--	/	+	--	++	0	+	+	/	++	++
Reason for rejection:		The site is within the Greenbelt.												
W30	S / M	-	-	--	/	+	--	/	0	++	+	-	++	++
	L	-	-	--	/	+	--	/	0	++	+	/	++	++
Reason for rejection:		The site is within the Greenbelt.												
W32	S / M	/	-	--	-	/	-	/	0	+	+	/	++	+



	L	/	-	--	-	/	-	/	0	+	+	/	++	+
<b>Reason for rejection:</b>		<p>Not allocated for use as biological treatment. Has been allocated in the Plan for another use.</p> <p>W32 Crumps Farm will see an amendment from the Revised Preferred Approach (2015) SA. This responds to impacts regarding the sustainable management of waste (SO9) and an amendment from the significantly positive impact previously stated to a minor positive. This has been reassessed due to parts of the site not having relevant planning / history.</p>												
SIE5	S / M	+	++	++	++	++	+	/	0	++	--	++	++	++
	L	+	++	++	++	++	+	/	0	++	--	/	++	++
<b>Reason for rejection:</b>		<p>At the Revised Preferred Approach (2015) stage, the site was deemed to have scored highly against other sites considered for allocation in the Waste Site Assessment Report in consideration also of its suitability to meet the capacity gap requirements and its conformity to the general principles of the Spatial Strategy and the proximity principle. This site was, as a result, a preferred allocation for its suitability for allocation for biological treatment. Since then, the site has been considered to not be suitable in Highway Terms and/or does not comply with Transport Policy. This is due to Grange Road being of an insufficient width to allow two HGVs to pass satisfactorily.</p>												

**Table 12: Appraisal of sites put forward for Enclosed Thermal Facilities: Combined Heat and Power Facilities (CHP)**

Sites for: COMBINED HEAT AND POWER FACILITIES (CHP)														
Site Ref.	Temp Effect	Sustainability Objectives (SO)												
		1	2	3	4	5	6	7	8	9	10	11	12	13
IWMF2	S / M	+	-	++	-	++	-	++	++	++	+	--	++	/
	L	+	-	++	-	++	-	++	++	++	+	/	++	/
<b>Allocated Site – Reason for allocation:</b>		<p>At present, the Waste Disposal Authority is exploring long term options surrounding the final destination for the stabilised residual waste output of the Tovi Eco Park Facility. Currently the 200,000t output of the facility is exported from the Plan Area. A competitive tender process will identify the long-term management solution for this waste, which includes continued exportation from the Plan Area. However, in line with net self-sufficiency, the Plan includes IWMF2 as a site allocation for 'other waste management' which could accommodate this waste.</p>												

		<p>It should be noted that a change in a positive impact identified in the SA at the Revised Preferred Approach (2015) stage for IWMF2 – Rivenhall has been necessary at this stage regarding SO2 (water quality). This is due to a number of water bodies being within the existing adjacent operational quarry and the presence of a lake located north of the IWMF as part of the mineral restoration. The site will now have a negative impact on water quality as identified. In addition, a significant negative impact was highlighted for flooding due to the site being partly within FZ2 and FZ3; however it has been re-assessed that the vast majority of the site sits within FZ1 - a very small portion of the access track to the site goes over a waterway (River Blackwater) designated as both FZ2 and FZ3 however, a bridge over the waterway significantly reduces the risk of the access road flooding. The site has also re-assessed as having significant positive impacts on the historic environment (SO5) where the listed and ancillary buildings at Woodhouse Farm are to be archaeologically recorded and renovated under the present approved application.</p>													
W3	S / M	/	-	/	/	+	/	++	/	++	+	-	++	++	
	L	/	-	/	/	+	/	++	/	++	+	/	++	++	
<b>Reason for rejection:</b>		<p>While close to the source of waste W3 Basildon is considered to be too small a site to accommodate a facility of the nature needed to meet this specific need. The site is however allocated for another use.</p> <p>An amendment to the impacts previously highlighted in the SA of the Revised Preferred Approach (2015) regarding health and well-being (SO11) on Site W3 (Basildon WWTW) has also been made. This is due to there being sensitive receptors within 250m of the site. As such the previously highlighted uncertain impacts are now judged to be negative. The site is also now recognised as being in FZ2 (previously erroneously judged to be in FZ1 for some uses) which sees an amendment to the impacts highlighted for flooding (SO3) as uncertain, where previously they were considered significantly positive. There will also now be uncertain impacts on landscape (SO6) for enclosed-thermal and open-air facilities as well as uncertain impacts on biodiversity due to the site being within 10km of internationally designated sites.</p>													
W7	S / M	/	-	--	/	/	-	++	/	++	/	-	+	++	
	L	/	-	--	/	/	-	++	/	++	/	/	+	++	
<b>Reason for rejection:</b>		<p>Not as sustainable, and did not score as highly as other sites considered for allocation for CHP. The site is however allocated for another use.</p>													
W8	S / M	/	++	++	/	-	-	/	/	+	+	-	++	/	

	L	/	++	++	/	-	-	/	/	+	+	/	++	/
<b>Reason for rejection:</b>		<p>Not as sustainable, and did not score as highly as other sites considered for allocation for AD. The site is however allocated for another use.</p> <p>An amendment has been made since the SA of the Revised Preferred Approach (2015) regarding historic environment impacts at W8 - Elsenham. Uncertain impacts were previously highlighted for certain facility types due to moderate issues regarding the historic environment (SO5), however a re-assessment of the site has led to a major impact issue (which may be acceptable subject to mitigation) being highlighted for all facility types. As such impacts are now negative.</p>												
W27	S / M	/	++	++	/	/	--	++	/	+	+	-	++	++
	L	/	++	++	/	/	--	++	/	+	+	/	++	++
<b>Reason for rejection:</b>		Not as sustainable, and did not score as highly as other sites considered for allocation for AD.												
W31	S / M	/	++	++	/	/	-	/	/	++	+	-	++	++
	L	/	++	++	/	/	-	/	/	++	+	/	++	++
<b>Reason for rejection:</b>		<p>It is noted in the commentary for W31 in the Site Assessment Report that should an Energy from Waste facility include flues it would have significant negative impacts (requiring an amendment to a red score using the methodology of that assessment) given the high number of residential neighbours within 250m of the site. For this reason, the site was rejected for use as CHP. The site is however allocated for another use.</p> <p>An amendment since the Revised Preferred Approach (2015) stage SA regards the previous positive impact stated for the sustainable management of waste (SO9). This has been amended to a significant positive impacts associated with its positive waste use / permission history.</p>												

**Table 13: Appraisal of sites put forward for Enclosed Thermal Facilities: Anaerobic Digestion / Biogas (AD)**

Sites for: ANAEROBIC DIGESTION (AD) / BIOGAS														
Site Ref.	Temp Effect	Sustainability Objectives (SO)												
		1	2	3	4	5	6	7	8	9	10	11	12	13

IWMF2	S / M	+	-	++	-	++	-	++	++	++	+	--	++	/
	L	+	-	++	-	++	-	++	++	++	+	/	++	/
<b>Allocated Site – Reason for allocation:</b>		<p>The site scored highly against other sites considered for allocation in the Waste Site Assessment Report. It is also considered suitable to meet the capacity gap requirements and its conformity to the general principles of the Spatial Strategy. The site has been allocated for Biological Treatment and it could be developed as AD if required in the Plan period.</p> <p>It should be noted that a change in a positive impact identified in the SA at the Revised Preferred Approach (2015) stage for IWMF2 – Rivenhall has been necessary at this stage regarding SO2 (water quality). This is due to a number of water bodies being within the existing adjacent operational quarry and the presence of a lake located north of the IWMF as part of the mineral restoration. The site will now have a negative impact on water quality as identified. In addition, a significant negative impact was highlighted for flooding due to the site being partly within FZ2 and FZ3; however it has been re-assessed that the vast majority of the site sits within FZ1 - a very small portion of the access track to the site goes over a waterway (River Blackwater) designated as both FZ2 and FZ3 however, a bridge over the waterway significantly reduces the risk of the access road flooding. The site has also re-assessed as having significant positive impacts on the historic environment (SO5) where the listed and ancillary buildings at Woodhouse Farm are to be archaeologically recorded and renovated under the present approved application.</p>												
W1	S / M	+	-	++	-	+	--	/	/	++	--	/	--	++
	L	+	-	++	-	+	--	/	/	++	--	/	--	++
<b>Reason for rejection</b>		The site is not considered to be suitable in Highway Terms and/or does not comply with Transport Policy.												
W3	S / M	/	-	/	/	+	/	++	/	++	+	-	++	++
	L	/	-	/	/	+	/	++	/	++	+	/	++	++
<b>Allocated Site – Reason for allocation:</b>		<p>The site scored highly against other sites considered for allocation in the Waste Site Assessment Report. It is also considered suitable to meet the capacity gap requirements and conforms to the general principles of the Spatial Strategy and the proximity principle. This site is preferred for its suitability for allocation for biological treatment, although the specific facility type has not been determined at this point.</p> <p>An amendment to the impacts previously highlighted in the SA of the Revised Preferred Approach (2015) regarding health and well-being (SO11) on Site W3 (Basildon WWTW) has also been made. This is due to there being</p>												

		sensitive receptors within 250m of the site. As such the previously highlighted uncertain impacts are now judged to be negative. The site is also now recognised as being in FZ2 (previously erroneously judged to be in FZ1 for some uses) which sees an amendment to the impacts highlighted for flooding (SO3) as uncertain, where previously they were considered significantly positive. There will also now be uncertain impacts on landscape (SO6) for enclosed-thermal and open-air facilities as well as uncertain impacts on biodiversity due to the site being within 10km of internationally designated sites.												
W7	S / M	/	-	--	/	/	-	++	/	++	/	-	+	++
	L	/	-	--	/	/	-	++	/	++	/	/	+	++
<b>Reason for rejection:</b>		Not as sustainable, and did not score as highly as other sites considered for allocation for AD. Has been allocated in the Plan for another use.												
W8	S / M	/	++	++	/	-	-	/	/	+	+	-	++	/
	L	/	++	++	/	-	-	/	/	+	+	/	++	/
<b>Reason for rejection:</b>		Not as sustainable, and did not score as highly as other sites considered for allocation for AD. Has been allocated in the Plan for another use.  An amendment has been made since the SA of the Revised Preferred Approach (2015) regarding historic environment impacts at W8 - Elsenham. Uncertain impacts were previously highlighted for certain facility types due to moderate issues regarding the historic environment (SO5), however a re-assessment of the site has led to a major impact issue (which may be acceptable subject to mitigation) being highlighted for all facility types. As such impacts are now negative.												
W13	S / M	/	-	++	-	++	/	/	/	++	/	--	+	++
	L	/	-	++	-	++	/	/	/	++	/	/	+	++
<b>Reason for rejection:</b>		The site scored relatively well against other sites considered for allocation in the Waste Site Assessment Report. It was considered suitable to meet the capacity gap requirements and conforms to the general principles of the Spatial Strategy and the proximity principle. As such, this site was a preferred site at the Revised Preferred Approach (2015) stage.  Since the Revised Preferred Approach (2015) stage, the site owner / developer has specified that Treatment – Anaerobic Digestion/Biogas is no longer promoted for consideration on the site.												

W17	S / M	/	-	++	++	+	+	++	/	++	--	--	--	++
	L	/	-	++	++	+	+	++	/	++	--	/	--	++
Reason for rejection		The site is not considered to be suitable in Highway Terms and/or does not comply with Transport Policy.												
W20	S / M	/	-	++	/	++	/	++	/	++	+	-	+	++
	L	/	-	++	/	++	/	++	/	++	+	/	+	++
Allocated Site – Reason for allocation:		<p>The site scored highly against other sites considered for allocation in the Waste Site Assessment Report. It is also considered suitable to meet the capacity gap requirements and conforms to the general principles of the Spatial Strategy and the proximity principle. This site is preferred for its suitability for allocation for biological treatment, although the specific facility type has not been determined at this point.</p> <p>An amendment has also been necessary for the impact on water quality (SO2) previously stated on site W20 Courtauld Road. The alteration to the route of the Nevendon Brook now sees it run along the eastern boundary of the proposed site. As such previously significantly positive impacts are now negative due to the proximity of this water body. There will also now be an uncertain impact on landscape (SO6), and amendment to the previously stated positive impact, due to a re-assessment of the site for enclosed thermal facilities. This is also the case for biodiversity (SO1) due to a re-assessment of the site for enclosed thermal facilities due to the proximity of internationally designated sites.</p>												
W21	S / M	/	-	--	/	+	--	++	/	+	+	--	++	++
	L	/	-	--	/	+	--	++	/	+	+	/	++	++
Reason for rejection:		The site is within the Greenbelt.												
W29	S / M	/	-	++	++	/	-	/	/	+	+	--	++	++
	L	/	-	++	++	/	-	/	/	+	+	/	++	++
Allocated Site – Reason for allocation:		<p>The site scored highly against other sites considered for allocation in the Waste Site Assessment Report. It is also considered suitable to meet the capacity gap requirements and conforms to the general principles of the Spatial Strategy and the proximity principle. This site is preferred for its suitability for allocation for biological treatment, although the specific facility type has not been determined at this point.</p>												
W31	S / M	/	++	++	/	/	-	/	/	++	+	-	++	++

	L	/	++	++	/	/	-	/	/	++	+	/	++	++
<b>Reason for rejection:</b>		<p>Not as sustainable, and did not score as highly as other sites considered for allocation for AD. Has been allocated in the Plan for another use.</p> <p>An amendment since the Revised Preferred Approach (2015) stage SA regards the previous positive impact stated for the sustainable management of waste (SO9). This has been amended to a significant positive impacts associated with its positive waste use / permission history.</p>												
W32	S / M	/	-	--	-	/	-	/	/	+	+	/	++	+
	L	/	-	--	-	/	-	/	/	+	+	/	++	+
<b>Reason for rejection:</b>		<p>Not as sustainable, and did not score as highly as other sites considered for allocation for AD. Has been allocated in the Plan for another use.</p> <p>W32 Crumps Farm will see an amendment from the Revised Preferred Approach (2015) SA. This responds to impacts regarding the sustainable management of waste (SO9) and an amendment from the significantly positive impact previously stated to a minor positive. This has been reassessed due to parts of the site not having relevant planning / history.</p>												
SIE5	S / M	/	++	++	++	++	+	/	/	++	--	++	++	++
	L	/	++	++	++	++	+	/	/	++	--	/	++	++
<b>Reason for rejection:</b>		<p>At the Revised Preferred Approach (2015) stage, the site was deemed to have scored highly against other sites considered for allocation in the Waste Site Assessment Report. It was also considered suitable to meet the capacity gap requirements and conformed to the general principles of the Spatial Strategy and the proximity principle. This site was, as a result, a preferred allocation for its suitability for allocation for biological treatment.</p> <p>Since then, the site has been considered to not be suitable in Highway Terms and/or does not comply with Transport Policy. This is due to Grange Road being of an insufficient width to allow two HGVs to pass satisfactorily.</p>												

**Table 14: Appraisal of sites put forward for Open Air Facilities: Construction, Demolition and Excavation Waste (CD&EW) Recycling Facilities (or inert recycling/soil screening and non-inert recycling)**

Sites for: CONSTRUCTION, DEMOLITION AND EXCAVATION (CD&EW) RECYCLING FACILITIES (OR INERT AND NON-INERT RECYCLING)														
Site Ref.	Temp Effect	Sustainability Objectives (SO)												
		1	2	3	4	5	6	7	8	9	10	11	12	13
L(i)4R	S / M	/	-	++	++	/	--	/	0	++	/	--	/	++
	L	/	-	++	++	/	--	/	0	++	/	/	/	++
Reason for rejection		The site is within the Green Belt.												
L(i)7	S / M	/	-	++	++	/	++	/	0	++	+	--	++	++
	L	/	-	++	++	/	++	/	0	++	+	/	++	++
Safeguarded site – Reason for safeguarding:		The granting of planning permission for this activity means that this site must now be considered to contribute towards the total waste capacity in the Plan Area. Allocation of the site to support this activity is therefore unnecessary.												
L(i)10R	S / M	+	-	++	++	+	/	++	0	+	+	--	++	++
	L	+	-	++	++	+	/	++	0	+	+	/	++	++
Allocated Site – Reason for allocation:		The site scored highly against other sites considered for allocation in the Waste Site Assessment Report. It is also considered suitable to meet the capacity gap requirements and conforms to the general principles of the Spatial Strategy and the proximity principle.												
L(i)17R	S / M	/	-	++	-	+	++	++	0	+	/	-	+	+
	L	/	-	++	-	+	++	++	0	+	/	-	+	+
Allocated Site – Reason for allocation		Site L(i)17R Newport Quarry was put forward during the Revised Preferred Approach (2015) consultation. The site scored highly against other sites considered for allocation in the Waste Site Assessment Report and was identified as being able to meet inert landfill and recycling needs particularly in the west of the County. For these												



		reasons the site has been allocated for both inert recycling and inert landfill.													
L(n)1R	S / M	+	-	++	++	/	/	++	0	+	/	-	+	++	
	L	+	-	++	++	/	/	++	0	+	/	/	+	++	
<b>Allocated Site – Reason for allocation:</b>		The site scored highly against other sites considered for allocation in the Waste Site Assessment Report. It is also considered suitable to meet the capacity gap requirements and conforms to the general principles of the Spatial Strategy and the proximity principle.													
L(n)6R	S / M	-	-	--	++	+	--	/	0	++	+	-	++	++	
	L	-	-	--	++	+	--	/	0	++	+	/	++	++	
<b>Reason for rejection</b>		The site is within the Green Belt.													
L(n)7R	S / M	/	-	--	++	/	/	/	0	+	+	/	++	+	
	L	/	-	--	++	/	/	/	0	+	+	/	++	+	
<b>Reason for rejection:</b>		<p>The WPAs do not consider that this site would be capable of operating independently for this specific use with other sites at Crumps Farm / Little Bullocks Farm having been allocated. The site however has been allocated for another use.</p> <p>There is an amendment from the SA of the Revised Preferred Approach (2015) regarding an erroneous impact on the sustainable management of waste (SO9) at site L(n)7R – Little Bullocks Farm Site A22. This is due to the site being Greenfield land with no planning history within the specific red-line boundary of the site. As such, the significant positive impact highlighted at the Revised Preferred Approach (2015) stage SA has been amended to be a minor positive impact. In addition, the site was also previously erroneously judged to have significant positive impacts on flooding (SO3) for certain uses / facilities, however a small amount of the site is within FZ3. As such the site will now have significantly negative impacts on this objective. A re-assessment of the site now also indicates that there will moderate impacts on landscape which will give rise to an uncertain impact on SO6; an amendment of a significantly positive score highlighted in the SA at the Revised Preferred Approach (2015) stage.</p>													
L(n)8R	S / M	/	-	++	++	+	-	/	0	+	+	--	++	/	
	L	/	-	++	++	+	-	/	0	+	+	/	++	/	

<b>Reason for rejection:</b>		<p>The WPAs do not consider that this site would be capable of operating independently for this specific use with other sites at Crumps Farm / Little Bullocks Farm having been allocated. The site has however been allocated in the Plan for another use.</p> <p>There is an amendment from the SA of the Revised Preferred Approach (2015) regarding an erroneous impact on the sustainable management of waste (SO9) at site L(n)8R. This is due to the site being Greenfield land with no planning history within the specific red-line boundary of the site. As such, the significant positive impact highlighted at the Revised Preferred Approach (2015) stage SA has been amended to be a minor positive impact. A re-assessment of the site now also indicates that there will moderate to major effects on landscape which will give rise to an negative impact on SO6; an amendment of an uncertain score highlighted in the SA at the Revised Preferred Approach (2015) stage.</p>												
W1	S / M	+	-	++	++	+	/	/	0	++	--	/	--	++
	L	+	-	++	++	+	/	/	0	++	--	/	--	++
<b>Reason for rejection</b>		The site is not considered to be suitable in Highway Terms and/or does not comply with Transport Policy.												
W3	S / M	+	-	/	++	+	/	++	0	++	+	-	++	++
	L	+	-	/	++	+	/	++	0	++	+	/	++	++
<b>Reason for rejection:</b>		<p>The WPAs have decided to prioritise meeting the forecasted biological recovery capacity need over the recycling of inert waste. This approach will reduce the amount of biological waste going to landfill. Sending biological waste to landfill, rather than inert waste, is considered to have greater environmental impacts, given the potential for such waste to generate bio-aerosols and greenhouse gases. As a result, this site has not been allocated for inert recycling and has been allocated in the Plan for biological treatment.</p> <p>An amendment to the impacts previously highlighted in the SA of the Revised Preferred Approach (2015) regarding health and well-being (SO11) on Site W3 (Basildon WWTW) has also been made. This is due to there being sensitive receptors within 250m of the site. As such the previously highlighted uncertain impacts are now judged to be negative. The site is also now recognised as being in FZ2 (previously erroneously judged to be in FZ1 for some uses) which sees an amendment to the impacts highlighted for flooding (SO3) as uncertain, where previously they were considered significantly positive.</p>												
W7	S / M	+	-	--	/	+	+	++	0	++	/	/	+	++
	L	+	-	--	/	+	+	++	0	++	/	/	+	++

<b>Allocated Site – Reason for allocation:</b>		<p>The site scored relatively highly against other sites considered for allocation in the Waste Site Assessment Report. It is also considered suitable to meet the capacity gap requirements and conforms to the general principles of the Spatial Strategy and the proximity principle.</p> <p>The WPAs have decided to prioritise meeting the forecasted biological recovery capacity need over the recycling of inert waste. This approach will reduce the amount of biological waste going to landfill. Sending biological waste to landfill, rather than inert waste, is considered to have greater environmental impacts, given the potential for such waste to generate bio-aerosols and greenhouse gases. As a result, this site was a preferred site for biological treatment at the Revised Preferred Approach (2015) stage. It scored highly against other sites considered for allocation in the Waste Site Assessment Report, was also considered suitable to meet the capacity gap requirements and conformed to the general principles of the Spatial Strategy and the proximity principle.</p> <p>Since the Revised Preferred Approach (2015) stage, it has been determined that the previous five preferred sites for biological treatment can deliver a total of 259,000tpa which is over and above the 217,000tpa needed. As the site W7 Sandon East scored significantly lower than the other four sites and those four sites on their own would provide sufficient capacity it has been discounted for biological waste treatment. The site has instead been allocated for inert recycling.</p>												
<b>W8</b>	<b>S / M</b>	+	++	++	/	-	-	/	0	+	+	-	++	/
	<b>L</b>	+	++	++	/	-	-	/	0	+	+	/	++	/
<b>Allocated Site – Reason for allocation:</b>		<p>The site scored highly against other sites considered for allocation in the Waste Site Assessment Report. It is also considered suitable to meet the capacity gap requirements and conforms to the general principles of the Spatial Strategy and the proximity principle.</p> <p>An amendment has been made since the SA of the Revised Preferred Approach (2015) regarding historic environment impacts at W8 - Elsenham. Uncertain impacts were previously highlighted for certain facility types due to moderate issues regarding the historic environment (SO5), however a re-assessment of the site has led to a major impact issue (which may be acceptable subject to mitigation) being highlighted for all facility types. As such impacts are now negative.</p>												
<b>W13</b>	<b>S / M</b>	/	-	++	++	++	++	/	0	++	/	--	+	++
	<b>L</b>	/	-	++	++	++	++	/	0	++	/	/	+	++
<b>Allocated Site – Reason for</b>		At the Revised Preferred Approach (2015) stage, this site was not allocated for inert recycling as its preferred												

<b>allocation:</b>		<p>use was for biological treatment. This was due to the WPAs having decided to prioritise meeting the forecasted biological recovery capacity need over the recycling of inert waste in order to reduce the amount of biological waste going to landfill.</p> <p>It should be noted that since the Revised Preferred Approach (2015) stage, the site owner / developer of site W13 (Wivenhoe Quarry Plant Area, Colchester) has specified that Anaerobic Digestion/Biogas is no longer to be promoted on the site. As the site also scored highly against other sites considered for inert recycling allocation in the Waste Site Assessment Report and due to its suitability in meeting the capacity gap requirements and conformity to the general principles of the Spatial Strategy and the proximity principle, the site has now been selected for inert recycling.</p>												
W14	S / M	/	-	++	++	++	++	/	0	++	--	-	--	++
	L	/	-	++	++	++	++	/	0	++	--	/	--	++
<b>Reason for rejection</b>		The site is not considered to be suitable in Highway Terms and/or does not comply with Transport Policy.												
W15	S / M	-	-	++	/	+	-	/	0	++	/	-	+	/
	L	-	-	++	/	+	-	/	0	++	/	/	+	/
<b>Reason for rejection:</b>		<p>Not as sustainable, and did not score as highly as other sites considered for allocation in the Waste Site Assessment Report. In addition, there is an application for another incompatible use (housing) on the site which is pending.</p> <p>Since the Revised Preferred Approach (2015) stage, the impact highlighted in the SA for landscape (SO6) has needed amendment from significantly negative to minor negative. This is due to a re-assessment of the site.</p>												
W18	S / M	/	++	++	++	+	/	/	0	++	--	-	--	++
	L	/	++	++	++	+	/	/	0	++	--	/	--	++
<b>Reason for rejection</b>		The site is not considered to be suitable in Highway Terms and/or does not comply with Transport Policy.												
W19	S / M	+	++	++	-	++	--	++	0	+	+	-	++	++
	L	+	++	++	-	++	--	++	0	+	+	/	++	++
<b>Reason for rejection</b>		At the Revised Preferred Approach (2015) stage the Council initially allocated this site, despite it failing the Stage 2 sieving criterion of being located within the Green Belt. Despite being located in the Green Belt, W19 was at												

		that stage deemed to have fewer other negative impacts than the sites for inert recycling that passed Stage 2. At this Pre-Submission stage however, the decision to allocate has been reversed which is consistent with other sites that also failed at Stage 2 due to being located within the Green Belt.												
W21	S / M	+	-	--	/	+	--	++	0	+	+	--	++	++
	L	+	-	--	/	+	--	++	0	+	+	/	++	++
<b>Reason for rejection:</b>		The site is within the Greenbelt.												
W24	S / M	+	-	++	-	++	/	++	0	++	--	/	--	-
	L	+	-	++	-	++	/	++	0	++	--	/	--	-
<b>Reason for rejection</b>		The site is not considered to be suitable in Highway Terms and/or does not comply with Transport Policy.												
W31	S / M	+	++	++	/	/	/	/	0	++	+	-	++	++
	L	+	++	++	/	/	/	/	0	++	+	/	++	++
<b>Allocated Site – Reason for allocation:</b>		<p>The site scored highly against other sites considered for allocation in the Waste Site Assessment Report in consideration also of its suitability to meet the capacity gap requirements and conforms to the general principles of the Spatial Strategy and the proximity principle.</p> <p>An amendment since the Revised Preferred Approach (2015) stage SA regards the previous positive impact stated for the sustainable management of waste (SO9). This has been amended to a significant positive impacts associated with its positive waste use / permission history.</p>												
W32	S / M	/	-	--	-	/	-	/	0	+	+	/	++	+
	L	/	-	--	-	/	-	/	0	+	+	/	++	+
<b>Allocated Site – Reason for allocation:</b>		<p>At the Revised Preferred Approach (2015) stage, this site was not selected. The site promoter put forward three proposals for inert recycling in this location: L(n)7R (55,000tpa), L(n)8R (30,000tpa) and W32 (80,000tpa) and previously L(n)7R was selected for inert recycling. The WPAs do not consider that three separate inert waste facilities at each of these three sites within the Little Bullocks / Crumps Farm operation would be capable of operating independently of each other and simultaneously from a practical standpoint. For this reason only one of the proposed sites has been included as a site allocation for inert waste recycling.</p> <p>W32 Crumps Farm has been selected because it provides for the most efficient use of the total waste site in</p>												

		<p>conjunction with other existing and permitted operations. It has the largest potential capacity of the three proposals (80,000tpa), is located closer to the highway and would not displace any part of landfill operation on L(n)7R. L(n)8R is a less appropriate location for an inert recycling operation and has been selected for taking hazardous waste.</p> <p>W32 Crumps Farm will see an amendment from the Revised Preferred Approach (2015) SA. This responds to impacts regarding the sustainable management of waste (SO9) and an amendment from the significantly positive impact previously stated to a minor positive. This has been reassessed due to parts of the site not having relevant planning / history.</p>												
W35	S / M	/	-	++	-	/	/	/	0	++	--	-	--	+
	L	/	-	++	-	/	/	/	0	++	--	/	--	+
<b>Reason for rejection</b>		The site is not considered to be suitable in Highway Terms and/or does not comply with Transport Policy.												
SIE5	S / M	+	++	++	++	++	+	/	0	++	--	++	++	++
	L	+	++	++	++	++	+	/	0	++	--	/	++	++
<b>Reason for rejection:</b>		Since the Revised Preferred Approach (2015) stage, the site has been considered to not be suitable in Highway Terms and/or does not comply with Transport Policy. This is due to Grange Road being of an insufficient width to allow two HGVs to pass satisfactorily.												

**Table 15: Appraisal of sites put forward for Open Air Facilities: Windrow Composting Facilities**

Sites for: WINDROW COMPOSTING FACILITIES														
Site Ref.	Temp Effect	Sustainability Objectives (SO)												
		1	2	3	4	5	6	7	8	9	10	11	12	13
W7	S / M	+	-	--	/	+	+	++	0	++	/	/	+	++
	L	+	-	--	/	+	+	++	0	++	/	/	+	++
<b>Reason for rejection:</b>		The WPAs have decided to prioritise meeting the forecasted biological recovery capacity need over the recycling of inert waste. This approach will reduce the amount of biological waste going to landfill. Sending biological waste to												

		<p>landfill, rather than inert waste, is considered to have greater environmental impacts, given the potential for such waste to generate bio-aerosols and greenhouse gases. As a result, this site was a preferred site for biological treatment at the Revised Preferred Approach (2015) stage. It scored highly against other sites considered for allocation in the Waste Site Assessment Report, was also considered suitable to meet the capacity gap requirements and conformed to the general principles of the Spatial Strategy and the proximity principle.</p> <p>Since the Revised Preferred Approach (2015) stage, it has been determined that the previous five preferred sites for biological treatment can deliver a total of 259,000tpa which is over and above the 217,000tpa needed. As the site W7 Sandon East scored significantly lower than the other four sites and those four sites on their own would provide sufficient capacity it has been discounted for biological waste treatment. The site has instead been allocated for inert recycling.</p>												
W8	S / M	+	++	++	/	-	-	/	0	+	+	-	++	/
	L	+	++	++	/	-	-	/	0	+	+	/	++	/
<b>Reason for rejection:</b>		<p>This site has not been allocated for use for open windrow composting as it is also proposed for inert waste recycling, which has a greater capacity gap. Therefore, it is recommended as suitable for allocation for inert waste recycling instead and has been allocated for this use instead.</p> <p>An amendment has been made since the SA of the Revised Preferred Approach (2015) regarding historic environment impacts at W8 - Elsenham. Uncertain impacts were previously highlighted for certain facility types due to moderate issues regarding the historic environment (SO5), however a re-assessment of the site has led to a major impact issue (which may be acceptable subject to mitigation) being highlighted for all facility types. As such impacts are now negative.</p>												
W21	S / M	+	-	--	/	+	--	++	0	+	+	--	++	++
	L	+	-	--	/	+	--	++	0	+	+	/	++	++
<b>Reason for rejection:</b>		The site is within the Greenbelt.												
W24	S / M	+	-	++	-	++	/	++	0	++	--	/	--	-
	L	+	-	++	-	++	/	++	0	++	--	/	--	-
<b>Reason for rejection</b>		The site is not considered to be suitable in Highway Terms and/or does not comply with Transport Policy.												
W25	S / M	+	-	++	-	+	/	/	0	--	--	--	--	++

	L	+	-	++	-	+	/	/	0	--	--	/	--	++
<b>Reason for rejection</b>		The site was not considered to be suitable in Highway Terms and/or did not comply with Transport Policy. This site has since been withdrawn by the site owner / developer.												
W29	S / M	/	-	++	++	+	+	/	0	++	+	--	++	++
	L	/	-	++	++	+	+	/	0	++	+	/	++	++
<b>Allocated Site – Reason for allocation:</b>		The site scored highly against other sites considered for allocation in the Waste Site Assessment Report. It is also considered suitable to meet the capacity gap requirements and conforms to the general principles of the Spatial Strategy and the proximity principle. This site is preferred for its suitability for allocation for biological treatment, although the specific facility type has not been determined at this point.												
W30	S / M	-	-	--	/	+	--	/	0	++	+	-	++	++
	L	-	-	--	/	+	--	/	0	++	+	/	++	++
<b>Reason for rejection:</b>		The site is within the Greenbelt.												

**Table 16: Appraisal of sites put forward for Open Air Facilities: Inert Landfill Sites**

Sites for: INERT LANDFILL SITES														
Site Ref.	Temp Effect	Sustainability Objectives (SO)												
		1	2	3	4	5	6	7	8	9	10	11	12	13
L(i)4R	S / M	/	--	++	++	/	--	/	0	++	/	--	+	++
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
<b>Reason for rejection</b>		The site is within the Green Belt.												
L(i)5	S / M	/	--	++	++	/	++	/	0	+	/	--	+	++
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
<b>Allocated Site – Reason for</b>		The site scored highly against other sites considered for allocation in the Waste Site Assessment Report. It is also												



<b>allocation:</b>		<p>considered suitable to meet the capacity gap requirements and conforms to the general principles of the Spatial Strategy and the proximity principle.</p> <p>The decision to prioritise sites for the treatment of biological waste over inert waste recycling and also not to take sites forward where located in the greenbelt has resulted in fewer sites being available for inert waste treatment. As a consequence, the need for sites suitable for inert waste landfill has increased. There is therefore a continued need for the same preferred sites previously identified in the Revised Preferred Approach as L(i)10R Blackley Quarry, L(n)7R – Little Bullocks Farm site, L(n)1R Slough Farm, L(i)6 Sandon and L(i)5 Sunnymead, Elmstead and Heath Farms</p>												
L(i)6	S / M	-	--	--	++	+	/	++	0	++	/	--	++	++
	L	/	--	--	/	0	/	0	0	0	0	/	0	0
<b>Allocated Site – Reason for allocation:</b>		<p>The site scored highly against other sites considered for allocation in the Waste Site Assessment Report. It is also considered suitable to meet the capacity gap requirements and conforms to the general principles of the Spatial Strategy and the proximity principle.</p> <p>The decision to prioritise sites for the treatment of biological waste over inert waste recycling and also not to take sites forward where located in the greenbelt has resulted in fewer sites being available for inert waste treatment. As a consequence, the need for sites suitable for inert waste landfill has increased. There is therefore a continued need for the same preferred sites previously identified in the Revised Preferred Approach as L(i)10R Blackley Quarry, L(n)7R – Little Bullocks Farm site, L(n)1R Slough Farm, L(i)6 Sandon and L(i)5 Sunnymead, Elmstead and Heath Farms</p>												
L(i)7R	S / M	/	--	++	++	/	++	/	0	++	+	--	++	++
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
<b>Safeguarded site – Reason for safeguarding:</b>		<p>The grant of planning permission for this activity means that this site must now be considered to contribute towards the total waste capacity in the Plan Area. Allocation of the site to support this activity is therefore unnecessary.</p>												
L(i)10R	S / M	+	--	++	++	+	/	++	0	+	+	--	++	++
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
<b>Allocated Site – Reason for allocation:</b>		<p>The site scored highly against other sites considered for allocation in the Waste Site Assessment Report. It is also considered suitable to meet the capacity gap requirements and conforms to the general principles of the Spatial Strategy and the proximity principle.</p>												

		<p>The decision to prioritise sites for the treatment of biological waste over inert waste recycling and also not to take sites forward where located in the greenbelt has resulted in fewer sites being available for inert waste treatment. As a consequence, the need for sites suitable for inert waste landfill has increased. There is therefore a continued need for the same preferred sites previously identified in the Revised Preferred Approach as L(i)10R Blackley Quarry, L(n)7R – Little Bullocks Farm site, L(n)1R Slough Farm, L(i)6 Sandon and L(i)5 Sunnymead, Elmstead and Heath Farms</p>												
L(i)13	S / M	/	--	++	/	+	/	/	0	++	/	--	+	+
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
<b>Reason for rejection:</b>		There is an application for another incompatible use (housing) on the site which is pending.												
L(i)15	S / M	/	--	++	/	+	++	++	0	++	++	--	++	++
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
<b>Allocated Site – Reason for allocation:</b>		<p>Fingringhoe Quarry (Li15) was submitted as a site suitable for inert waste landfill by the landowner as part of the call for sites. Despite scoring well in the Waste Site Assessment Report, and being considered suitable for inert waste disposal, at the Revised Preferred Approach (2015) stage the WPAs chose not to include Fingringhoe Quarry as a preferred site allocation where it was considered that the inert fill material to be used at this site would be entirely sourced from London and imported to the site by barge via Ballast Quay Wharf. Waste arising in Essex or Southend-on-Sea would not be used to fill the void space (currently being created by the extraction of sand and gravel) and thus the site was not taken forward.</p> <p>Since then the site promoter, through their representation (through the Revised Preferred Approach [2015] consultation) and subsequent correspondence, has been able to satisfy the Waste Planning Authorities that a reasonable portion of inert fill material to be used at this site can be sourced from within the Plan Area. For this reason, and the fact that an existing mineral void exists at the quarry, the site has now been allocated to contribute in meeting void space requirements..</p>												
L(i)16	S / M	+	--	--	/	+	--	++	0	+	+	--	++	++
	L	/	--	--	/	0	/	0	0	0	0	/	0	0
<b>Reason for rejection :</b>		The site is within the Green Belt.												
L(i)17R	S / M	/	--	++	-	+	++	++	0	+	/	--	+	+

	L	/	--	++	/	0	/	0	0	0	/	0	0	
<b>Allocated Site – Reason for allocation:</b>		Site L(j)17R Newport Quarry was put forward during the Revised Preferred Approach (2015) consultation. The site scored highly against other sites considered for allocation in the Waste Site Assessment Report and was identified as being able to meet inert landfill and recycling needs particularly in the west of the County. For these reasons the site has been allocated for both inert recycling and inert landfill.												
L(n)1R	S / M	+	--	++	++	/	/	++	0	+	/	--	+	++
	L	/	--	++	/	0	/	0	0	0	/	0	0	
<b>Allocated Site – Reason for allocation:</b>		<p>The site scored highly against other sites considered for allocation in the Waste Site Assessment Report. It is also considered suitable to meet the capacity gap requirements and conforms to the general principles of the Spatial Strategy and the proximity principle.</p> <p>The decision to prioritise sites for the treatment of biological waste over inert waste recycling and also not to take sites forward where located in the greenbelt has resulted in fewer sites being available for inert waste treatment. As a consequence, the need for sites suitable for inert waste landfill has increased. There is therefore a continued need for the same preferred sites previously identified in the Revised Preferred Approach as L(i)10R Blackley Quarry, L(n)7R – Little Bullocks Farm site, L(n)1R Slough Farm, L(i)6 Sandon and L(i)5 Sunnymead, Elmstead and Heath Farms</p>												
L(n)5	S / M	/	--	++	++	+	+	/	0	++	+	--	++	++
	L	/	--	++	/	0	/	0	0	0	/	0	0	
<b>Allocated Site – Reason for allocation:</b>		<p>Despite scoring well as part of the site selection process the large L(n)5 Bellhouse site (which currently takes non-hazardous wastes and has an agreed restoration plan) was not taken forward as part of the Revised Preferred Approach. This was due to reservations that it was close to other sites in this area near Colchester (such as L(i)7 Stanway). However, given re-assessment it is prudent to now include it as an inert landfill site.</p> <p>It should be noted that a change in a significant positive impact identified in the SA at the Revised Preferred Approach (2015) stage for L(n)5 – Bellhouse has been necessary at this stage regarding SO6 (landscape). This is due to a re-assessment which has established that there would be a minor adverse effect regarding views from receptors (properties and a PROW).</p>												
L(n)7R	S / M	/	--	--	++	/	/	/	0	+	+	/	++	/

	L	/	--	--	/	0	/	0	0	0	0	/	0	0
<b>Allocated Site – Reason for allocation:</b>		<p>The site scored highly against other sites considered for allocation in the Waste Site Assessment Report. It is also considered suitable to meet the capacity gap requirements and conforms to the general principles of the Spatial Strategy and the proximity principle.</p> <p>The decision to prioritise sites for the treatment of biological waste over inert waste recycling and also not to take sites forward where located in the greenbelt has resulted in fewer sites being available for inert waste treatment. As a consequence, the need for sites suitable for inert waste landfill has increased. There is therefore a continued need for the same preferred sites previously identified in the Revised Preferred Approach as L(i)10R Blackley Quarry, L(n)7R – Little Bullocks Farm site, L(n)1R Slough Farm, L(i)6 Sandon and L(i)5 Sunnymeade, Elmstead and Heath Farms</p> <p>There is also an amendment from the SA of the Revised Preferred Approach (2015) regarding an erroneous impact on the sustainable management of waste (SO9) at site L(n)7R – Little Bullocks Farm Site A22. This is due to the site being Greenfield land with no planning history within the specific red-line boundary of the site. As such, the significant positive impact highlighted at the Revised Preferred Approach (2015) stage SA has been amended to be a minor positive impact. In addition, the site was also previously erroneously judged to have significant positive impacts on flooding (SO3) for certain uses / facilities, however a small amount of the site is within FZ3. As such the site will now have significantly negative impacts on this objective. A re-assessment of the site now also indicates that there will moderate impacts on landscape which will give rise to an uncertain impact on SO6; an amendment of a significantly positive score highlighted in the SA at the Revised Preferred Approach (2015) stage.</p>												
L(n)8R	S / M	/	--	++	++	+	-	/	0	+	+	--	++	/
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
<b>Reason for rejection:</b>		<p>This is the only landfill site that has been proposed as suitable for taking hazardous waste, which may be required during the plan period. The site has been allocated for the landfill of hazardous waste and as such rejected for allocation for inert landfill in the Plan.</p> <p>There is an amendment from the SA of the Revised Preferred Approach (2015) regarding an erroneous impact on the sustainable management of waste (SO9) at site L(n)8R. This is due to the site being Greenfield land with no planning history within the specific red-line boundary of the site. As such, the significant positive impact highlighted at the Revised Preferred Approach (2015) stage SA has been amended to be a minor positive impact. A re-assessment of the site now also indicates that there will moderate to major effects on landscape which will give rise to an negative impact on SO6; an amendment of an uncertain score highlighted in the SA at the Revised</p>												

Preferred Approach (2015) stage.

**Table 17: Appraisal of sites put forward for Open Air Facilities: Hazardous Landfill Sites**

Sites for: HAZARDOUS LANDFILL SITES														
Site Ref.	Temp Effect	Sustainability Objectives (SO)												
		1	2	3	4	5	6	7	8	9	10	11	12	13
L(n)8R	S / M	/	--	++	++	+	-	/	0	+	+	--	++	/
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
<b>Preferred Site – Reason for allocation:</b>		<p>This is the only landfill site that has been proposed as suitable for taking hazardous waste. It has not been allocated for alternative uses as preferred use was for a stable non-reactive hazardous landfill and allocated accordingly in the Plan.</p> <p>There is an amendment from the SA of the Revised Preferred Approach (2015) regarding an erroneous impact on the sustainable management of waste (SO9) at site L(n)8R. This is due to the site being Greenfield land with no planning history within the specific red-line boundary of the site. As such, the significant positive impact highlighted at the Revised Preferred Approach (2015) stage SA has been amended to be a minor positive impact. A re-assessment of the site now also indicates that there will moderate to major effects on landscape which will give rise to an negative impact on SO6; an amendment of an uncertain score highlighted in the SA at the Revised Preferred Approach (2015) stage.</p>												

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**Essex County Council and Southend-on-Sea  
Borough Council Replacement Waste Local Plan**

**Schedule of Modifications**

**Sustainability Appraisal and Strategic Environmental  
Assessment Addendum**

**November 2016**





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# 1 Introduction and Methodology

## 1.1 Background

Following the Examination in Public of the Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan, in September-October 2016, a series of modifications were proposed by the Inspector during the hearing sessions in order to make the Replacement Waste Local Plan sound and legally compliant.

These modifications are subject to Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) in this report, in so far as they may alter those impacts highlighted in the SA/SEA that accompanied the Regulation 19 Pre-Submission consultation version of Replacement Waste Local Plan 2016.

## 1.2 Sustainability Appraisal and Strategic Environmental Assessment

The requirement for Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) emanates from a high level national and international commitment to sustainable development. The most commonly used definition of sustainable development is that drawn up by the World Trade Commission on Environment and Development in 1987 which states that sustainable development is:

*‘development that meets the needs of the present without compromising the ability of future generations to meet their own needs.’*

The European Directive 2001/42/EC “on the assessment of the effects of certain plans and programmes on the environment” (the ‘SEA Directive’) was adopted in June 2001 with a view to increase the level of protection for the environment, integrate environmental considerations into the preparation and adoption of plans and programmes and to promote sustainable development.

It requires a Strategic Environmental Assessment to be carried out for all plans and programmes which are:

*‘subject to preparation and/or adoption by an authority at national, regional or local level or which are prepared by an authority for adoption, through a legislative procedure by Parliament or Government, and required by legislative, regulatory or administrative provisions’.*

The few exceptions are detailed in Article 3 (8, 9) of the SEA Directive. The aim of the SEA is to identify potentially significant environmental effects created as a result of the implementation of the plan or programme on issues such as

*‘biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors’*

as specified in Annex 1(f) of the Directive. The Directive was transposed into English legislation by the Environmental Assessment of Plans and Programmes Regulations 2004, which came into force on 21 July 2004.

Sustainability Appraisals examine the effects of proposed plans and programmes in a wider context, taking into account economic, social and environmental considerations in order to promote sustainable development. They are mandatory for all Development Plan Documents in accordance with the Planning and Compulsory Purchase Act 2004 as amended.

Whilst the requirements to produce a Sustainability Appraisal and Strategic Environmental Assessment are distinct, Government guidance considers that it is possible to satisfy the two requirements through a single approach providing that the requirements of the SEA Directive are met.

### **1.3 The Aim and Structure of this Report**

This report forms part of the SA/SEA of the Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan 2016. It should be read alongside the SA/SEA Environmental Report of the Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan that was published for consultation alongside the Regulation 19 Pre-Submission Replacement Waste Local Plan in early 2016. Sustainability impacts identified in this report represent changes to the aforementioned SA/SEA Environmental Report.

Numerous modifications to the Plan are proposed. These modifications are a result of recommendations made by the Inspector during the Examination in Public hearing sessions in order to make the Replacement Waste Local Plan sound and legally compliant. Modifications at this stage in the process could change the direction of the Plan; therefore it is essential that the modifications are also subject to SA/SEA.

This report screens the proposed modifications to the Plan to explore whether they would result in any additional significant impacts to those identified within the SA/SEA Environmental Report of the Pre-Submission Replacement Waste Local Plan 2016. Should any additional significant impacts be apparent as a result of any of the modifications, this document sets out any subsequent changes to the SA/SEA Environmental Report of the Regulation 19 Pre-Submission Replacement Waste Local Plan 2016 that are necessary. Any temporal, secondary, cumulative or synergistic impacts resulting from the modifications will also be highlighted should they be apparent.

## 2 Modifications to the Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan 2016

### 2.1 SA/SEA Screening Process and Amendments to the SA/SEA Environmental Report

The Main and Minor Modifications to the Plan have been screened to identify whether or not they will have significant sustainability effects that would be additional to, or alter those, identified in the SA/SEA Environmental Report for the Plan at the Regulation 19 Pre-Submission stage.

It should be noted that many of the modifications are minor. The National Planning Practice Guidance is clear that changes that are not significant will not require further SA/SEA work. The guidance defines significant changes as those that '*substantially alter [...] and [are] likely to give rise to significant effects*'. Nevertheless, minor changes have also been screened for significant impacts in the formulation of this report.

**NOTE: It has been assessed, after screening, that none of the Plan's proposed Minor Modifications will give rise to any significant sustainability effects, nor will there be any resultant change to the SA of the Plan at the Regulation 19 Pre-Submission stage.**

The following table explores the sustainability effects of those Main Modifications to the Plan chronologically. The final column notes whether there would be any additional significant sustainability effects or changes to the Plan's Regulation 19 Pre-Submission SA/SEA Environmental Report.

Main Modifications are identified in the following ways:

- Deletions: ~~strikethrough~~
- Additions: **Red**

**Table 1: Main Modifications to the ECC & SBC Replacement Waste Local Plan and impact on accompanying SA/SEA Environmental Report**

Mod. No.	Paragraph / Policy Reference	Original Text	Amendment	Significant Impact(s) / Impact on Sustainability Appraisal
1	Paragraph 4.21 to 4.23	See Appendix 1	<p>See Appendix 1</p> <p><b>Appendix 1 – The Waste Challenge at a Glance</b></p> <p><b>4.21 Non Hazardous Waste</b></p> <p><del>There has been and will continue to be cross boundary movements of waste. It has been identified within planning practice guidance that Greater London net imports of non-hazardous waste to the Plan area requires specific consideration. It is estimated that in total the net exports to the plan area from Greater London are estimated to be 1.92mtpa until 2026, with net importation from London having ceased by 2026 according to the adopted London Plan 2015;</del></p> <p><b>There has been and will continue to be cross boundary movements of waste. Planning Practice Guidance states that imports of waste from Greater London require specific consideration. The Vision &amp; Strategic Objectives of this Plan therefore recognises the need to continue to make provision for imports from London, albeit at a reducing rate. After 2026, imports of non-hazardous waste to landfill should only be of non-recyclable and non-biodegradable wastes, while some provision may also be made for the management of residues suitable for energy recovery at consented plant.</b></p> <p>Non-organic, non-hazardous waste arisings within the Plan area are expected to moderately increase during the Plan period. In 2015, it was estimated there <del>was</del> <b>were</b> 1.57mt of</p>	There will be no significant sustainability effects, or changes to the SA, as a result of this modification.

Mod. No.	Paragraph / Policy Reference	Original Text	Amendment	Significant Impact(s) / Impact on Sustainability Appraisal
			<p>this type of waste arising in the <del>P</del>lan area. By 2031/32, arisings are estimated to be 1.67mtpa. <b>Imports of non-hazardous waste from London has been estimated to be in the region of 375,000 tpa in the early years of the Plan reducing down to around 150,000 tpa at the end of the Plan period.</b></p> <p>Organic non-hazardous waste arisings within the Plan area are also expected to increase slightly during the Plan period. In <del>2014</del> <b>2015</b>, it was estimated that there was 331,000t of organic non-hazardous waste arising in the Plan area. By 2031/32, arisings are estimated to be 349,000tpa.</p> <p>Consented operational capacity <del>will</del> <b>is expected to</b> decline from 221,000tpa to 131,000tpa should no further planning permissions be granted <b>over the Plan period</b>. Consequently there is <b>will be</b> a requirement for <del>217,000</del> <b>218,000</b>tpa of new organic treatment capacity by 2031/32;</p> <p>At present, the Waste Disposal Authority is <b>considering</b> exploring long term <b>management</b> options <del>surrounding the final destination for the stabilised residual waste output of the Tovi Eco Park Facility.</del> <b>In 2016</b>, <del>Currently the</del> <b>annual</b> 200,000t output of the <del>from this</del> facility is <b>was</b> exported from the Plan area. A competitive tender process will identify the long-term management solution for this waste, which could include continued exportation from the Plan area. However, <del>in line with</del> <b>In line with the Plan’s Strategy for the Plan area to become</b> net self-sufficient <b>with regard to its waste management needs where practicable</b>, the Plan includes a</p>	

Mod. No.	Paragraph / Policy Reference	Original Text	Amendment	Significant Impact(s) / Impact on Sustainability Appraisal
			<p>site allocation which <b>has capacity to potentially manage this</b> <del>could accommodate this</del> <b>residual waste in the Plan area in the longer term.</b></p> <p>Assuming <del>the</del> <b>that suitable</b> facilities <b>are delivered on the sites</b> allocated in the <del>this</del> Plan are all successfully delivered, it is <b>forecasted</b> that <del>there will be a surplus capacity of some</del> non-hazardous landfill void space <b>will exist at the end of the Plan period.</b> However, in accordance with the waste hierarchy, <b>this remains the option of last resort and</b> is not considered to be a substitute for <b>developing further identifying additional treatment capacity that will move waste up the hierarchy.</b></p> <p><b>4.22 Construction, Demolition and Excavation Waste</b></p> <p>It is estimated that local Construction, Demolition and Excavation waste arisings was 3.62mtpa in 2014 (including 0.31mt of <b>waste imported from</b> London's <del>projected needs</del>).</p> <p>It is identified that there is a need for an additional 4.5 <b>1.95</b>mtpa of Construction, Demolition and Excavation waste <del>recovery</del> <b>management</b> (recycling or disposal) capacity by 2031/32, partly due to the <b>expiry</b> <del>expiration</del> of existing temporary planning permissions.</p> <p>Locally collected evidence suggests that there is further diversion from landfill through beneficial re-use of inert waste, which equated to approximately 765,000tpa in 2014.</p>	



Mod. No.	Paragraph / Policy Reference	Original Text	Amendment	Significant Impact(s) / Impact on Sustainability Appraisal
			<p>It is estimated that there is a current inert landfill void space of approximately <del>3.4</del> <b>3.25</b> million m<sup>3</sup>, which would equate to approximately <del>5.1</del> <b>4.8</b> million tonnes of <del>CDE disposal</del> capacity. This is, however, not sufficient to accommodate the forecasted need for inert landfill <b>waste management capacity</b> over the Plan period, <b>to accommodate both the Plan Area and the inert waste projected to be imported from London.</b> To address this, <b>sites capable of providing 640,000tpa</b> of inert waste recycling capacity and <del>9.52million m<sup>3</sup> of inert waste disposal capacity</del> <b>landfill sites capable of accommodating 14.08 million tonnes in total</b> are allocated in the Plan. <b>It is, however, recognised that a proportion of the total inert waste recycling capacity is temporary in nature, and without further permissions, the total inert recycling capacity is likely to reduce to 340,000tpa at the end of the Plan period.</b></p> <p><b>Nonetheless, even after the allocation of all sites suitable for inert waste recycling and inert waste landfill,</b> Following the above allocations, there is a further need to find management solutions for a total of <del>2.58mt</del> <b>7.05mt</b> of inert waste. <b>Since no</b> <del>No</del> other submitted <b>sites</b> proposals have been deemed suitable for the management of inert waste in the Plan area, although locational criteria policies provide the means by which <b>would be used to assess any additional</b> future inert waste management proposals <del>can</del> <b>will be</b> assessed.</p> <p><b>4.23 Hazardous Waste</b></p>	

Mod. No.	Paragraph / Policy Reference	Original Text	Amendment	Significant Impact(s) / Impact on Sustainability Appraisal
			<p><b>In 2014</b>, most of the 113,000tpa of hazardous waste requiring management is exported from the Plan area <b>for final management. Of this, around 23,000 tpa was disposed to landfill.</b></p> <p>The only landfill accepting hazardous waste (Stable Non-Reactive Hazardous Waste -SNRHW) within the Plan area closed in April 2014, so <b>in 2016</b> waste <b>was</b> <del>is being</del> disposed of at sites beyond the Plan area. This facility, on average, accepted approximately 50,000 tonnes of SNRHW per annum, which included imports from other authority areas as well as waste generated within the Plan area.</p> <p>Hazardous waste is not subject to net self-sufficiency within this Plan due to the specialist nature of the <del>waste</del> <b>facility type</b> and the <b>relatively</b> small quantities generated within the Plan area.</p> <p>A new <del>disposal</del> site <b>for a Stable Non-Reactive Hazardous Waste Landfill</b> with <b>a total</b> capacity for 30,000 tonnes per annum of <del>Stable Non-Reactive Hazardous Waste Landfill</del> is allocated in the Plan. No other proposals for the management of hazardous waste in the Plan area were submitted. Locational criteria policies <b>would be used to assess any</b> future hazardous waste proposals <del>provide the means by which will be assessed</del>, should the market identify a need for further facilities in the Plan area.</p>	
2	Paragraph 5.3	The principle of net self-sufficiency does	The principle of net self-sufficiency does not apply to <b>hazardous waste or</b> radioactive waste as it is not	There will be no significant

Mod. No.	Paragraph / Policy Reference	Original Text	Amendment	Significant Impact(s) / Impact on Sustainability Appraisal
		not apply to reactive hazardous waste or radioactive waste as it is not considered practical to provide for such specialist facilities within the Plan area.	considered practical to provide for such specialist facilities <b>on the basis of net self-sufficiency</b> within the Plan area.	sustainability effects, or changes to the SA, as a result of this modification.
3	Policy 1	See Appendix 2	<p>See Appendix 2</p> <p><b>Appendix 2</b></p> <div style="border: 1px solid black; padding: 10px;"> <p><b>Policy 1</b></p> <p><b>Need for Waste Management Facilities</b></p> <p><i>In order to meet the future needs of the Plan area, waste development will be permitted to meet the shortfall in capacity of:</i></p> <ul style="list-style-type: none"> <li>a. <i>up to <del>217,000</del> <b>218,000</b> tonnes per annum by 2031/32 of biological treatment for non-hazardous organic waste;</i></li> <li>b. <i>up to 4.5 <b>1.95</b> million tonnes per annum by 2031/32 for the management of inert waste;</i></li> <li>c. <i>up to 200,000 tonnes per annum by 2031/32 for the <b>further management of non-hazardous residual</b></i></li> </ul> </div>	There will be no significant sustainability effects, or changes to the SA, as a result of this modification.

Mod. No.	Paragraph / Policy Reference	Original Text	Amendment	Significant Impact(s) / Impact on Sustainability Appraisal
			<p><del>waste other waste; and</del></p> <p>d. up to 50,250 tonnes per annum by 2031/32 for the management of hazardous waste.</p>	
4	Policy 2	See Appendix 3	<p>See Appendix 3</p> <p><b>Waste Consultation Areas</b></p> <p>6.7 Safeguarding will be implemented through Waste Consultation Areas which are defined around all permitted waste developments (as indicated in the Authority Monitoring Report) and sites allocated in this Plan. Proposed development, including that proposed in Local Plans, within 250m of a safeguarded site <b>(or 400m of a Water Recycling Centre - WRC)</b> will be subject to consultation with the Waste Planning Authority. Waste Consultation Areas will be communicated to the Essex <b>and Southend-on-Sea District/Borough and City Councils.</b> <del>and the unitary authority of Southend-on-Sea Borough Council.</del> Sensitive uses should not be located adjacent to, or within, 250 metres <b>(or 400m of a WRC)</b> of any part of a safeguarded site. However, the actual buffer needed around each site will depend upon the nature of the proposed 'sensitive' use and on the specific impacts of the <b>current</b> waste operation.</p> <p>6.8 There will be instances where a proposed non-waste use <b>may not</b> <del>is considered unlikely</del> to compromise the operation of an existing or future waste management facility operating</p>	There will be no significant sustainability effects, or changes to the SA, as a result of this modification.

Mod. No.	Paragraph / Policy Reference	Original Text	Amendment	Significant Impact(s) / Impact on Sustainability Appraisal
			<p>within that safeguarded site. As such, Table 21 'Development in Waste Consultation Area' sets out those development types which, when coming forward in Waste Consultation Areas, the Waste Planning Authority would not need to be consulted upon.</p> <p>6.9 Existing and allocated waste sites and infrastructure will be protected from inappropriate neighbouring developments that may prejudice their continuing efficient operation. Waste development is not normally a high-value use in comparison with other land uses and as such the existing and allocated sites and facilities are safeguarded as they make an important contribution to the management of waste arising in Essex and Southend-on-Sea. Without a safeguarding policy, sites required to achieve a sustainable distribution of waste management facilities could be lost to other development. Sites covered by this policy that become vacant or where the existing waste use ceases operation, will continue to be subject to safeguarding.</p> <p>6.10 In some cases, <b>the potential adverse impact on</b> loss of a <b>waste</b> site or <b>operation of a waste</b> facility may <b>not be consented by the WPAs. Such instances could include scenarios where</b> be acceptable, for example where it would enable the implementation of a town centre improvement strategy and it can be ascertained that the <b>re are</b> wider social, <b>environmental</b> and/or economic benefits resulting from <b>new development that may</b> such a scheme outweigh the retention of the waste use. In such instances, alternative <b>site</b> provision for the displaced waste use <b>could</b> will be required</p>	

Mod. No.	Paragraph / Policy Reference	Original Text	Amendment	Significant Impact(s) / Impact on Sustainability Appraisal
			<p>should such capacity continue to be necessary.</p> <p><b>6.11 Whilst Waste Consultation Zones apply to all permitted waste facilities in the Plan area, the WPAs are unlikely to object to development in close proximity to a small scale, non-specialist facilities, defined in this Plan as those with an annual capacity of 10,000tpa or less'</b></p> <p>6.12 The identification of alternative provision could be made by the relevant Local Planning Authority, the applicant for the non-waste development or potentially be considered through a focused review of this Waste Local Plan. This aims to ensure that no shortfall in equivalent waste management capacity occurs in Essex and Southend-on-Sea during the Plan period. <b>Any</b> The loss of waste capacity in the Plan area will be monitored through the Annual Monitoring Report.</p> <p>6.13 The network of Local Authority Collected Waste facilities comprising the Integrated Waste Management Facility at Tovi EcoPark, Basildon and the six supporting transfer stations are integral for the sustainable management of household waste arising in the Plan area. As such, these sites (listed in Existing Waste Management Capacity, Table 3) are to be safeguarded unless it can be demonstrated that they are no longer required for the delivery of the Joint Municipal Waste Management Strategy.</p> <p>6.14 Waste management infrastructure includes facilities such as wharves and railheads, which play an important role in the movement of waste materials. All current and any</p>	

Mod. No.	Paragraph / Policy Reference	Original Text	Amendment	Significant Impact(s) / Impact on Sustainability Appraisal
			<p>future facilities that come forward for this purpose during the plan period will be safeguarded under this policy.</p> <div style="border: 1px solid black; padding: 10px;"> <p><b>Policy 2</b></p> <p><b>Safeguarding Waste Management Sites and Infrastructure</b></p> <p><b>Waste Consultation Areas</b>  <i>Where non-waste development is proposed within 250m of safeguarded sites, <b>or within 400m of a WRC</b>, the relevant Local Planning Authority is required to consult the Waste Planning Authority on the <del>planning application</del> proposed <b>non-waste development</b> (except for those developments defined as 'Excluded' in 'Appendix C - Development Excluded from Safeguarding Provisions').</i></p> <p><b><i>Proposals which are considered to have the potential to adversely impact on the operation of a safeguarded waste site or infrastructure, including the site allocations within this Plan, are likely to be opposed where:</i></b></p> <ul style="list-style-type: none"> <li><i>a. a temporary permission for a waste use has expired, or the waste management use has otherwise ceased, and the site or infrastructure is <b>considered</b> unsuitable for a subsequent</i></li> </ul> </div>	

Mod. No.	Paragraph / Policy Reference	Original Text	Amendment	Significant Impact(s) / Impact on Sustainability Appraisal
			<p><i>waste use; or</i></p> <p><i>b. redevelopment of the <b>waste</b> site or loss of the <b>waste</b> infrastructure would form part of a strategy or scheme that has wider <b>environmental</b>, social and/or economic benefits that <del>clearly</del> outweigh the retention of the site or the infrastructure for <b>the</b> waste use, and alternative provision is made for the displaced waste use; or</i></p> <p><i>c. a suitable replacement site or infrastructure has otherwise been</i></p> <p><del><i>Where proposed non-waste development gives rise to an objection from the Waste Planning Authority, it is expected that the proposed development would not be permitted</i></del></p>	
5	Policy 3, Clause 3	See Appendix 4	<p>See Appendix 4</p> <p><b>Policy 3</b></p> <p><b>Strategic Site Allocations</b></p> <p><i>Waste management development at the following locations (see Strategic Site Allocations Map) will be</i></p>	The allocation of Dollymans Farm in Basildon/Rochford (L(i)16) for inert landfill will have significant environmental effects in addition to a number of changes to



Mod. No.	Paragraph / Policy Reference	Original Text	Amendment	Significant Impact(s) / Impact on Sustainability Appraisal
			<p><del>permitted as follows and where proposals take into account the requirements identified in the relevant development principles (Allocated Sites: Development Principles):</del></p> <p>1. For biological waste management at:</p> <ul style="list-style-type: none"> <li>• <del>Bellhouse Landfill Site, Colchester (Reg 18 ref: W29);</del></li> <li>• <del>Basildon Waste Water Treatment Works, Basildon (Reg 18 ref: W3);</del></li> <li>• <del>Courtauld Road, Basildon (Reg 18 ref: W20); and</del></li> <li>• <del>Rivenhall, Braintree (Reg 18 ref: IWMF2).</del></li> </ul> <p>2. For inert waste recycling at:</p> <ul style="list-style-type: none"> <li>• <del>Crumps Farm, Gt and Lt Canfield, Uttlesford (Reg 18 ref: W32);</del></li> <li>• <del>Elsenham, Uttlesford (Reg 18 ref: W8);</del></li> <li>• <del>Sandon East, Chelmsford (Reg 18 ref: W7);</del></li> <li>• <del>Slough Farm Ardleigh, Tendring (Reg 18 ref: L(n)1R);</del></li> <li>• <del>Blackley Quarry, Gt Leighs, Chelmsford (Reg 18 ref: L(i)10R);</del></li> <li>• <b>Sunnymead, Elmstead &amp; Heath Farms, Tendring (W36);</b></li> <li>• <del>Wivenhoe Quarry Plant Area, Tendring (Reg 18 ref: W13);</del></li> <li>• <del>Morses Lane - Brightlingsea, Tendring (Reg 18 ref: W31); and</del></li> </ul>	<p>the Regulation 19 Pre-Submission SA Environmental Report. These implications are covered in more detail in Section 3 of this report.</p>

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			<ul style="list-style-type: none"> <li>• <del>Newport Quarry, Uttlesford (Reg 18 ref: L(i)17R).</del></li> </ul> <p>3. For <del>other</del> <b>residual non-hazardous</b> waste management at:</p> <ul style="list-style-type: none"> <li>• <del>Rivenhall, Braintree (Reg 18 ref: IWMF2).</del></li> </ul> <p>4. For inert landfill at:</p> <ul style="list-style-type: none"> <li>• <del>Little Bullocks Farm, Great and Little Canfield, Uttlesford (Reg 18 ref: L(n)7R);</del></li> <li>• <del>Slough Farm, Ardleigh, Tendring (Reg 18 ref: L(n)1R);</del></li> <li>• <del>Blackley Quarry, Gt Leighs, Chelmsford (Reg 18 ref: L(i)10R);</del></li> <li>• <del>Sandon, Chelmsford (Reg 18 ref: L(i)6);</del></li> <li>• <del>Sunnymead, Elmstead &amp; Heath Farms, Tendring (Reg 18 ref: L(i)5);</del></li> <li>• <del>Newport Quarry, Uttlesford (Reg 18 ref: L(i)17R);</del></li> <li>• <del>Bellhouse Landfill Site, Colchester (Reg 18 ref: L(n)5);</del></li> <li>• <del>Fingringhoe Quarry, Colchester (Reg 18 ref: L(i)15);</del></li> <li>• <b>Dollymans Farm, Basildon/Rochford (L(i)16);</b></li> </ul> <p>5. For hazardous landfill at:</p> <ul style="list-style-type: none"> <li>• <del>Little Bullocks Farm, Great and Little Canfield, Uttlesford (L(n)8R).</del></li> </ul>	
6	Paragraph	Proposals within the	Proposals within the Areas of Search will normally require	This Major

Mod. No.	Paragraph / Policy Reference	Original Text	Amendment	Significant Impact(s) / Impact on Sustainability Appraisal
	8.10	Areas of Search will normally require express planning permission and will be considered against policies in the RWLP, and the wider Development Plan as a whole. The design and operation of waste management facilities proposed within Areas of Search should be consistent with existing uses in the employment area.	express planning permission and will be considered against <b>other relevant</b> policies in the RWLP, <b>including Policy 10 – Development Management</b> , and the wider Development Plan as a whole. <b>The need to consider the wider Development Plan is important as it is the relevant Local Plan which determines whether an Area of Search designation remains relevant. Should a Local Plan seek to re-allocate land pertaining to an Area of Search away from B2/B8 uses, the criteria upon which Areas of Search are based would no longer be fulfilled. In such instances, the location would cease to be an Area of Search and Policy 4 would no longer apply.</b> The design and operation of waste management facilities proposed within Areas of Search should be <del>consistent</del> <b>compatible</b> with existing uses in the employment area.	Modification will not give rise to a significant sustainability effect, however does ensure a change to the SA Environmental Report (and Non-Technical Summary) of the Regulation 19 Pre-Submission Plan. This change is highlighted in more detail in Section 3 of this report.
7	Policy 4	<i>See Appendix 5</i>	<p><i>See Appendix 5 – Policy 4</i></p> <p><b>Areas of Search</b>  <del><i>Proposals for waste management development in the following locations will be permitted.</i></del></p> <p><b><i>Proposals for waste management development in the following Areas of Search, as defined on the Policies Map, will be supported in principle provided that the design and use of the facility is compatible with existing uses in the employment area.</i></b></p>	There will be no significant sustainability effects, or changes to the SA, as a result of this modification.

Mod. No.	Paragraph / Policy Reference	Original Text	Amendment				Significant Impact(s) / Impact on Sustainability Appraisal
			<b><i>Proposals for waste management will be considered against other relevant policies of this Plan and the wider Development Plan.</i></b>				
			<b>Area of Search</b>	<b>District</b>	<b>Area of Search</b>	<b>District</b>	
			Burnt Mills Central	Basildon	Westways	Chelmsford	
			Festival Business Park	Basildon	Widford Industrial Estate	Chelmsford	
			Pipps Hill	Basildon	Land of Axial Way, Myland	Colchester	
			Southfields Business Park	Basildon	Severalls Industry Park	Colchester	
			Bluebridge Industrial Estate	Braintree	Tollgate, Stanway	Colchester	
			Earls Colne Airfield	Braintree	Whitehall Road Industrial Estate	Colchester	
			Eastwasy-Crittall Road, Waterside Park	Braintree	Langston Road/Oakland Hill, Loughton	Epping Forest	
			Freebournes Industrial	Braintree	Pinnacles and	Harlow	

Mod. No.	Paragraph / Policy Reference	Original Text	Amendment				Significant Impact(s) / Impact on Sustainability Appraisal
			Estate		Roydenbury Industrial Estate		
			Skyline 120	Braintree	Temple Fields	Harlow	
			Springwood Industrial Estate	Braintree	Rochford Business Park	Rochford	
			Sturmer Industrial Estate Area 1	Braintree	Michelins Farm	Rochford	
			Childerditch Industrial Estate	Brentwood	Stock Road	Southend-on-Sea	
			West Horndon	Brentwood	Temple Farm	Southend-on-Sea	
			Drovers Way	Chelmsford	Martells Farm Industrial Estate	Tendring	
			Dukes Park Industrial Estate	Chelmsford	<b>Oakwood and Crusader Business Park</b>	<b>Tendring</b>	
			Springfield Business Park	Chelmsford	Start Hill, Great Hallingbury	Uttlesford	

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8	Policy 5	See Appendix 6 & 7	<p><b>Appendix 6 – Paragraph 8.15</b></p> <p>8.15 Waste management development can, <b>depending on its type</b> be delivered in either enclosed or open facilities. <del>separated into two broad categories, those known as 'enclosed facilities' where waste is processed inside a building. Enclosed facilities can be broadly similar in appearance to other industrial processes developments such as factories which take place within warehouses. Some examples are listed in the table below.</del> <del>of enclosed waste facilities include in vessel composting, anaerobic digestion and thermal treatment developments. The other category is 'Open facilities, which although occasionally are</del> can also be partially enclosed, largely deal with waste in the open air. Examples of open waste facilities include inert waste recycling and open windrow composting developments.</p> <table border="1" data-bbox="831 967 1644 1422"> <thead> <tr> <th data-bbox="831 967 1133 1023">Broad Waste Facility Type</th> <th data-bbox="1133 967 1644 1023">Example Waste Facility</th> </tr> </thead> <tbody> <tr> <td data-bbox="831 1023 1133 1331" rowspan="6"><b>Enclosed Waste Facilities (housed in buildings)</b></td> <td data-bbox="1133 1023 1644 1062"><b>Transfer Station</b></td> </tr> <tr> <td data-bbox="1133 1062 1644 1102"><b>Storage</b></td> </tr> <tr> <td data-bbox="1133 1102 1644 1142"><b>Materials Recovery Facility (MRF)</b></td> </tr> <tr> <td data-bbox="1133 1142 1644 1182"><b>Metal Recycling Facility</b></td> </tr> <tr> <td data-bbox="1133 1182 1644 1238"><b>End of Life Vehicle (ELV) Recycling Facilities</b></td> </tr> <tr> <td data-bbox="1133 1238 1644 1331"><b>In-vessel Composting Facility</b> <b>Mechanical Biological Treatment Facility (MBT)</b></td> </tr> <tr> <td data-bbox="831 1331 1133 1422" rowspan="2"><b>Enclosed Thermal Facilities (housed in buildings with flues)</b></td> <td data-bbox="1133 1331 1644 1386"><b>Combined Heat and Power Facilities (CHP)</b></td> </tr> <tr> <td data-bbox="1133 1386 1644 1422"><b>Gasification and Pyrolysis Facilities</b></td> </tr> </tbody> </table>	Broad Waste Facility Type	Example Waste Facility	<b>Enclosed Waste Facilities (housed in buildings)</b>	<b>Transfer Station</b>	<b>Storage</b>	<b>Materials Recovery Facility (MRF)</b>	<b>Metal Recycling Facility</b>	<b>End of Life Vehicle (ELV) Recycling Facilities</b>	<b>In-vessel Composting Facility</b> <b>Mechanical Biological Treatment Facility (MBT)</b>	<b>Enclosed Thermal Facilities (housed in buildings with flues)</b>	<b>Combined Heat and Power Facilities (CHP)</b>	<b>Gasification and Pyrolysis Facilities</b>	There will be no significant sustainability effects, or changes to the SA, as a result of this modification.
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			<p><i>within the administrative areas of Essex and Southend-on-Sea; and</i></p> <p><i>3. it is demonstrated that the site is at least as suitable for such development as Site Allocations or Areas of Search, with reference to the overall spatial strategy and site assessment methodology associated with this Plan.</i></p> <p><i>In addition, proposals should be located at or in:</i></p> <ul style="list-style-type: none"> <li><i>a. employment areas that are existing or allocated in a Local Plan for general industry (B2) and storage and distribution (B8);or</i></li> <li><i>b. existing permitted waste management sites or co-located with other waste management development; or</i></li> <li><i>c. the same site or co-located in close proximity to where the waste arises; or</i></li> <li><i>d. the curtilages of Waste Water Treatment Works (in the case of biological waste); or,</i></li> <li><i>e. areas of Previously Developed Land; or</i></li> <li><i>f. redundant agricultural or forestry buildings and their curtilages (in the case of green waste</i></li> </ul>	



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			<p><i>and/or biological waste).</i></p> <p><i>Proposals for energy recovery facilities with combined heat and power are expected to demonstrate that the heat produced will be supplied to a district heat network or direct to commercial or industrial users.</i></p> <p><i>Any proposals that come forward on land use types not identified above will be assessed on their merits, based on the policies in <b>this Plan</b> the adopted RWLP. Such locations will be considered less favourably than those set out within this Policy.</i></p>	
9	Policy 6	See Appendix 8	<p>See Appendix 8</p> <p><b>Appendix 8</b></p> <p><b>Policy 6</b></p> <p><b>Open Waste Facilities on Unallocated Sites or outside Areas of Search</b></p> <p><i>Proposals for new open waste management facilities will be permitted where:</i></p> <ol style="list-style-type: none"> <li><i>the waste site allocations <del>or</del> <b>and</b> the Areas of Search in this Plan are shown to be unsuitable <b>and/or</b> unavailable for the proposed</i></li> </ol>	There will be no significant sustainability effects, or changes to the SA, as a result of this modification.

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			<p><i>development;</i></p> <p>2. <b>although not exclusively</b>, a need for the capacity of the proposed development has been demonstrated to manage waste arising from within the administrative areas of Essex and Southend-on-Sea;</p> <p>3. <i>it is demonstrated that the site is at least as suitable for such development as Site Allocations or Areas of Search, with reference to the overall spatial strategy and site assessment methodology associated with this Plan.</i></p> <p><i>In addition, proposals should be located at or in:</i></p> <p>a. <i>redundant farm land (in the case of green waste and/or biological waste); or</i></p> <p>b. <i>demolition and construction sites, where the inert waste materials are to be used on the construction project on that site; or</i></p> <p>c. <i>existing permitted waste management sites or co-located with other waste management development; or</i></p> <p>d. <i>the curtilages of Waste Water Treatment Works (in the case of biological waste); or</i></p>	

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			<p><i>e. mineral and landfill sites where waste material is used in conjunction with restoration, or proposed waste operations are temporary and linked to the completion of the mineral/landfill operation; or</i></p> <p><i>f. areas of Previously Developed Land; or</i></p> <p><i>g. employment areas that are existing or allocated in a Local Plan for general industry (B2) and storage and distribution (B8).</i></p> <p><i>Any proposals that come forward on land use types not identified above will be assessed on their merits, based on the policies in <b>this Plan</b>. <del>the adopted RWLP</del>. Such locations will be considered less favourably than those set out within this Policy.</i></p>	
10	Policy 7	See Appendix 9	<p>See Appendix 9</p> <p><b>Appendix 9 – Supporting Text and Policy 7</b></p> <p><b>Nuclear Radioactive Waste</b></p> <p><b>8.21</b> Bradwell-on-Sea Nuclear Power Station is a licensed Nuclear Site and is the principal source of radioactive waste arisings within the Plan area whilst the Power Station is decommissioned.</p>	There will be no significant sustainability effects, or changes to the SA, as a result of this modification.

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			<p><b>8.22</b> The nuclear waste arisings from this process comprise Very Low Level (VLLW), Low Level (LLW) and Intermediate Level (ILW) Radioactive Wastes. A key element of the decommissioning is to manage the waste arising, to enable the waste to be safely retrieved from the facility, stored and processed whilst having regard to the level of radioactivity and long term options available.</p> <p><del><b>8.23</b> The Bradwell-on-Sea site is the first site operated by Magnox within the Government’s “Nuclear Decommissioning Authority (NDA)” to be decommissioned, and this is within an accelerated programme to deliver the “care and maintenance” stage in 2016/17. At this stage the site would be cleared and secured as appropriate, including the storage of ILW within a dedicated on-site long term ILW Storage facility. The ILW will remain in the store until a national Geological Disposal Facility is available to receive the packages. This process is in accordance with DECC’s UK’s waste management strategy for LLW &amp; ILW (dated 2010).</del></p> <p><b>The Bradwell-on-Sea site is one of the first UK nuclear reactor sites to be decommissioned. Within the period covered by this policy document, the site will enter into an extended period of care and maintenance prior to which the site will be secured as appropriate, and packaged ILW placed in storage within the dedicated on-site interim ILW Storage facility. The packaged ILW will remain in the store until a national Geological Disposal Facility (GDF) is available to receive the packages. This process is in accordance with DECC’s UK’s waste management strategy for LLW &amp; ILW (dated 2010).</b></p>	

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			<p><b>Following the extended period of care and maintenance, the site will be decommissioned and remediation activities undertaken which when completed will allow the site to reach end state and enable the next planned use.</b></p> <p><b>8.24</b> The Government is separately pursuing its strategy (Implementing Geological Disposal: A framework for the long-term management of higher activity radioactive waste, 2014) for a long term national Geological Disposal Facility (GDF) which is scheduled to be operational by 2040. It proposes a range of activities to be taken forward between 2014 and 2016 to set the framework for the GDF site selection process. The GDF is a “Nationally Significant Infrastructure Project” (NSIP) and the future siting is still to be determined. NSIPs are a national consideration and therefore outside of the remit of the RWLP.</p> <p><b>8.25</b> It is noted that although the Plan cannot rule out any type of development, it was held in the Waste Local Plan 2001 that the geology of the Plan area does not support the disposal and containment of nuclear waste and that it was therefore likely that any such facility would be located beyond the Plan area. However, evidence contained in the Radioactive Waste Management Ltd consultation on ‘National Geological Screening Guidance – Providing information on Geology’ (September 2015) indicates that there is not a specific type of geology to accommodate a national GDF. This is due to the number of possible design solutions to accommodate different types of geology and the</p>	

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			<p>respective safety issues. The location of a GDF will be addressed through a public consultation, managed by Government, to determine an appropriate strategy. Any new GDF will receive the ILW waste that is currently stored at Bradwell-on-Sea.</p> <p><del>8.26 The NDA was established as a Non-Departmental Public Body under the Energy Act (2004) to ensure that the UK's nuclear legacy sites are decommissioned and cleaned up safely, securely, cost-effectively and in ways that protect people and the environment. The NDA is responsible for developing nuclear decommissioning plans and implementing them through an estate-wide strategy. The Strategies are to develop a clear understanding of what is required to deliver the decommissioning agenda with a strategic focus and coherent approach to decommissioning. The third Strategy "NDA Strategy III" is to be published for consultation in January 2016 and takes into account best practice and new procedures as a result of de-commissioning activities at Bradwell-on-Sea and other licenced sites across the UK. This includes the application of the Waste Hierarchy to reduce the quantity of waste to be disposed.</del> <b>The NDA was established as a Non-Departmental Public Body under the Energy Act (2004) to ensure that the UK's nuclear legacy sites are decommissioned and cleaned up safely, securely, cost-effectively and in ways that protect people and the environment. The NDA is responsible for developing nuclear decommissioning plans and implementing them through an estate-wide strategy. The Strategies are to develop a clear understanding of what is required to</b></p>	

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			<p><b>deliver the decommissioning agenda with a strategic focus and coherent approach to decommissioning. The third Strategy “NDA Strategy III” was published in April 2016 and takes into account best practice and new procedures as a result of de-commissioning activities at Bradwell-on-Sea and other licenced sites across the UK. Proposals that are consistent with the current strategy (or its subsequent revisions) will be supported in line with Policy 7. This includes the application of the Waste Hierarchy to reduce the quantity of waste to be disposed and the beneficial reuse of material and waste to achieve the site end state and enable the next planned use.</b></p> <p><b>8.27</b> The Government’s National Policy Statement (NPS) for Nuclear Power Generation<b>(8)</b> is considering the Bradwell-on-Sea site, alongside seven other sites nationally, for future nuclear energy development. If the Bradwell-on-Sea site is selected as one of the suitable sites for nuclear energy development, then there would be further arisings of ILW in the Plan area. The fate of these materials ultimately depends upon the progress of the GDF and would need to be considered in the context of future national policy.</p> <p><b>8.28</b> Given the formative status of this process any potential waste arisings cannot be planned for at this stage. Such a new nuclear power station would be considered an NSIP and therefore outside of the remit of this Plan.</p> <div data-bbox="831 1342 1644 1415" style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p><b>Policy 7</b></p> </div>	

Mod. No.	Paragraph / Policy Reference	Original Text	Amendment	Significant Impact(s) / Impact on Sustainability Appraisal
			<p><b>Radioactive Waste Management Nuclear Waste Treatment and Storage at Bradwell-on-Sea</b></p> <p><i>Proposals for facilities for the <b>management</b> <del>treatment and/or storage</del> of nuclear radioactive Intermediate Level Waste (ILW), Low Level Waste (LLW) or Very Low Level Waste (VLLW) will <b>be supported</b> <del>only be acceptable</del> within the Nuclear Licensed Areas at Bradwell-on-Sea, where:</i></p> <ul style="list-style-type: none"> <li><i>a. the proposals are consistent with the national strategy for managing ILW, LLW and VLLW as well as the decommissioning plans for the Bradwell-on-Sea power station;</i></li> <li><i>b. the proposals are informed by the outcome of economic and environmental assessments that support and justify the management of <b>radioactive decommissioned nuclear waste at this location</b> <del>on-site</del>, and;</i></li> <li><i>c. the proposals would not cause any unacceptable adverse impacts to the environment, human health or local amenity.</i></li> </ul>	
11	Policy 9	See Appendix 10	<p>See Appendix 10</p> <p><b>Appendix 10</b></p>	There will be no significant sustainability effects, or changes to the SA, as a result of this



Mod. No.	Paragraph / Policy Reference	Original Text	Amendment	Significant Impact(s) / Impact on Sustainability Appraisal
			<p><b>Policy 9</b></p> <p><b>Waste Disposal Facilities on Unallocated sites</b></p> <p><i>Proposals for landfill facilities will be permitted where:</i></p> <ol style="list-style-type: none"> <li>1. <i>the landfill site allocations in this Plan are shown to be unsuitable <b>and</b>/or unavailable for the proposed development;</i></li> <li>2. <b><i>although not exclusively</i></b>, <i>a need for the capacity of the proposed development has been demonstrated to manage waste arising from within the administrative areas of Essex and Southend-on-Sea;</i></li> <li>3. <i>it is demonstrated that the site is at least as suitable for such development as the landfill site allocations, with reference to the site assessment methodology associated with this Plan; and</i></li> <li>4. <i>that the proposed landfill has been demonstrated to be the most appropriate and acceptable development in relation to the Waste Hierarchy.</i></li> </ol> <p><i>In addition, preference will be given to proposals:</i></p> <ol style="list-style-type: none"> <li>a. <i>for the restoration of a preferred or reserve site</i></li> </ol>	<p>modification.</p>

Mod. No.	Paragraph / Policy Reference	Original Text	Amendment	Significant Impact(s) / Impact on Sustainability Appraisal
			<p><i>in the Minerals Local Plan; or</i></p> <p><i>b. for an extension of time to complete the permitted restoration within the boundary of an existing landfill site.</i></p> <p><i>Proposals for non-inert landfill are required to demonstrate the capture of landfill gas for energy generation by the most efficient means.</i></p> <p><i>Any proposals that come forward on land use types not identified above will be assessed on their merits, based on the policies in <b>this Plan</b> <del>the adopted RWLP</del>. Such <del>locations will be considered less favourably than those set out within this Policy.</del></i></p>	
12	Paragraph 9.33	<p>The Public Rights of Way (PROW) network provides an important means of accessing the countryside. Where necessary, applicants will be required to ensure that PROW remain usable at all times or provide satisfactory</p>	<p>The Public Rights of Way (PROW) network provides an important means of accessing the countryside. Where <b>relevant, applications for waste management</b> will be required to ensure that PROW remain usable at all times or provide satisfactory alternative routes. Alternative paths and any necessary diversions of existing paths will be required to be in place prior to the closure of the existing PROW. <b>Restoration schemes should, in the first instance, be seen as an opportunity to enhance and upgrade PROW where possible, especially with regard to the provision of Bridleways as multi-user paths as part of any permission granted. In all cases, restoration schemes should provide for access which is at least as good as that existing before workings began.</b> <del>and the The</del></p>	<p>There will be no significant sustainability effects, or changes to the SA, as a result of this modification.</p>

Mod. No.	Paragraph / Policy Reference	Original Text	Amendment	Significant Impact(s) / Impact on Sustainability Appraisal
		<p>alternative routes. Alternative paths and any necessary diversions of existing paths will be required to be in place prior to the closure of the existing PROW. Restoration schemes should provide for access which is at least as good as that existing before workings began and should be seen as an opportunity to create new PROW where this is possible and desirable. The closure of a PROW, where no alternative route is provided, will normally not be acceptable.</p>	<p>closure of a PROW, where no alternative route is provided, will not normally be acceptable.”</p>	
13	Policy 10	<i>See Appendix 11</i>	<i>See Appendix 11</i>	There will be no significant

Mod. No.	Paragraph / Policy Reference	Original Text	Amendment	Significant Impact(s) / Impact on Sustainability Appraisal
			<p><b>Appendix 11 –</b></p> <div style="border: 1px solid black; padding: 10px;"> <p><b>Policy 10</b></p> <p><b>Development Management Criteria</b></p> <p><i>Proposals for waste management development will be permitted where it can be demonstrated that the development would not have an unacceptable impact (including cumulative impact in combination with other existing or permitted development) on:</i></p> <p><i>a. local amenity (including noise levels, odour, air quality, dust, litter, light pollution and vibration);</i></p> <p><del><i>b. the quality and quantity of water within water courses, groundwater and surface water;</i></del> <b><i>b. the quality of water within water bodies, with particular regard to:</i></b></p> <ul style="list-style-type: none"> <li><b><i>• preventing the deterioration of their existing status; or</i></b></li> <li><b><i>• failure to achieve the objective of ‘good status’, and</i></b></li> <li><b><i>• the quantity of water for resource purposes within water bodies’</i></b></li> </ul> <p><i>c. the capacity of existing drainage systems;</i></p> <p><i>d. the best and most versatile agricultural land;</i></p> </div>	<p>sustainability effects, or changes to the SA, as a result of this modification.</p>

Mod. No.	Paragraph / Policy Reference	Original Text	Amendment	Significant Impact(s) / Impact on Sustainability Appraisal
			<p><i>e. farming, horticulture and forestry;</i></p> <p><i>f. aircraft safety due to the risk of bird strike and/or building height and position;</i></p> <p><i>g. the safety and capacity of the road and other transport networks;</i></p> <p><i>h. the appearance, quality and character of the landscape, countryside and visual environment and any local features that contribute to its local distinctiveness;</i></p> <p><i>i. the openness and purpose of the Metropolitan Green Belt;</i></p> <p><i>j. Public Open Space, the definitive Public Rights of Way network and outdoor recreation facilities;</i></p> <p><i>k. land stability;</i></p> <p><i>l. the natural and geological environment (including internationally, nationally or locally designated sites and irreplaceable habitats);</i></p> <p><i>m. the historic environment including heritage and archaeological assets and their settings; and</i></p> <p><i>n. the character and quality of the area, in which the</i></p>	

Mod. No.	Paragraph / Policy Reference	Original Text	Amendment	Significant Impact(s) / Impact on Sustainability Appraisal
			<p><i>development is situated, through poor design.</i></p> <p><b><i>Where appropriate, enhancement of the environment would be sought, including, but not exclusively, the enhancement of the Public Rights of Way network, creation of recreation opportunities and enhancement of the natural, historic and built environment and surrounding landscape.</i></b></p>	
14	Policy 12	See Appendix 12	<p>See Appendix 12</p> <p><b>Appendix 12</b></p> <div data-bbox="831 863 1641 1417" style="border: 1px solid black; padding: 10px;"> <p><b>Policy 12</b></p> <p><b>Transport and Access</b></p> <p><i>Proposals for waste management development will be permitted where it is demonstrated that the development would not have an unacceptable impact on the efficiency and effective operation of the road network, including safety and capacity, local amenity and the environment.</i></p> <p><i>Proposals for the transportation of waste by rail and/or water will be encouraged subject to other policies in this Plan. Where transportation by road is proposed,</i></p> </div>	There will be no significant sustainability effects, or changes to the SA, as a result of this modification.

Mod. No.	Paragraph / Policy Reference	Original Text	Amendment	Significant Impact(s) / Impact on Sustainability Appraisal
			<p><i>this will be permitted where the road network is suitable for use by Heavy Goods Vehicles or can be improved to accommodate such vehicles.</i></p> <p><i>The following hierarchy of preference for transportation will be applied:</i></p> <ul style="list-style-type: none"> <li><i>a. the transport of waste by rail or water;</i></li> <li><i>b. where it is demonstrated that (a) above is not feasible or practicable, access will be required to a suitable existing junction with the main road network (not including secondary distributor roads, estate roads and other routes that provide local access), via a suitable section of existing road, as short as possible, without causing a detrimental impact upon the safety and efficiency of the network; or</i></li> <li><i>c. where it is demonstrated (b) above is not feasible, direct access to the main road network involving the construction of a new access and/or junction where there is no suitable existing access point and/or junction; or</i></li> <li><b><i>d. Where access to the main road network in accordance with (b) and (c) above is not feasible, road access via a suitable existing road prior to gaining access onto the main</i></b></li> </ul>	

Mod. No.	Paragraph / Policy Reference	Original Text	Amendment	Significant Impact(s) / Impact on Sustainability Appraisal								
			<p style="text-align: center;"><b><i>road network will exceptionally be permitted, having regard to the scale of the development, the proximity of sensitive receptors, the capacity of the road and an assessment of the impact on road safety.</i></b></p>									
15	Table 8 – Bellhouse Landfill Site	<p>Indicative Facility Scale:</p> <p>75,000tpa - Biological Treatment Facility</p> <p>3,000,000m<sup>3</sup> – Inert Landfill</p> <p>Estimated Availability: Between: up to 5-10 years from adoption</p>	<p>Indicative Facility Scale:</p> <p>75,000tpa - Biological Treatment Facility</p> <p><del>3,000,000m<sup>3</sup></del> <b>250,000tpa</b> – Inert Landfill</p> <p>Estimated Availability: <b>Upon adoption (2017)</b> Between: up to 5-10 years from adoption</p>	There will be no significant sustainability effects, or changes to the SA, as a result of this modification.								
16	Table 11 – Little Bullocks and Crumps Farm, Great and Little Canfield	See Appendix 14	<p>See Appendix 14</p> <p><b>Appendix 14 – Table 11 Little Bullocks and Crumps Farm, Great and Little Canfield</b></p> <table border="1" data-bbox="831 1198 1653 1422"> <thead> <tr> <th data-bbox="831 1198 1032 1235">District</th> <td data-bbox="1032 1198 1653 1235">Uttlesford</td> </tr> </thead> <tbody> <tr> <th data-bbox="831 1235 1032 1272">Area</th> <td data-bbox="1032 1235 1653 1272">7.77ha <b>6.90ha</b> - Site 1</td> </tr> <tr> <td></td> <td data-bbox="1032 1310 1653 1347">6.15ha - Site 2</td> </tr> <tr> <td></td> <td data-bbox="1032 1385 1653 1422">3.52 ha - Site 3</td> </tr> </tbody> </table>	District	Uttlesford	Area	7.77ha <b>6.90ha</b> - Site 1		6.15ha - Site 2		3.52 ha - Site 3	There will be no significant sustainability effects, or changes to the SA, as a result of this modification.
District	Uttlesford											
Area	7.77ha <b>6.90ha</b> - Site 1											
	6.15ha - Site 2											
	3.52 ha - Site 3											



Mod. No.	Paragraph / Policy Reference	Original Text	Amendment		Significant Impact(s) / Impact on Sustainability Appraisal
			<b>Indicative Facility Scale</b>	420,000m <sup>3</sup> - Inert Landfill (Site 1) 45,000m <sup>3</sup> - Hazardous Landfill (Site 2) 80,000tpa - Inert Recycling Capacity (Site 3)	
			<b>Link to Waste and Mineral Activities</b>	Site 1 is allocated for extraction within the MLP 2014 as site A22. Site 2 is allocated for extraction within the MLP 2014 as site A23.	
			<b>Site Allocation For</b>	Inert Landfill Capacity (Site 1) Hazardous Landfill Capacity (Site 2) Inert Waste Recycling Capacity (Site 3)	
			<b>Access</b>	Via haul road through existing Crumps Farm site to B1256	
			<b>Estimated Availability</b>	Site 1 - 5 to 10 years Site 2 - Upon adoption of RWLP Site 3 – <b>5 to 10 years</b> would be brought forward, during the Plan period at an appropriate stage to ensure that it could be operated within the context of the existing Major Waste Management Facility at Crumps Farm.	
			<b>Life</b>	Site 1 - 12 years	

Mod. No.	Paragraph / Policy Reference	Original Text	Amendment	Significant Impact(s) / Impact on Sustainability Appraisal				
			<table border="1" data-bbox="831 304 1653 416"> <tr> <td data-bbox="831 304 1037 368"></td> <td data-bbox="1037 304 1653 368">Site 2 -<b>15 years</b> <del>30 years</del></td> </tr> <tr> <td data-bbox="831 368 1037 416"></td> <td data-bbox="1037 368 1653 416">Site 3 -<b>15 years</b> <del>Permanent</del></td> </tr> </table> <p data-bbox="801 496 1619 603">These sites would be extensions to the existing mineral/waste site at Crumps Farm. The following issues apply to all three sites:</p> <ul data-bbox="853 644 1659 1011" style="list-style-type: none"> <li>• A vehicle <del>routing</del> <b>routeing</b> agreement is required to ensure the site would be accessed via the existing access for Crumps Farm onto Stortford Road (B1256) to travel via the A120/M11. An internal haul road would be required between the site and the Crumps Farm access.</li> <li>• Dust mitigation measures, limits on duration (hours of operation) and noise standards (from noise sensitive properties) will be established in the interests of protecting local amenity.</li> </ul> <p data-bbox="801 1050 1599 1118">The following specific issues and opportunities are to be addressed for Site 1:</p> <ul data-bbox="853 1161 1675 1417" style="list-style-type: none"> <li>• The eastern end of the site lies in a small secluded valley with a small river and nearby woodland. Advanced planting should screen views of the area from this direction, including views from the PRow Lt Canfield 19.</li> <li>• The river and Local Wildlife Site (LoWS) require protection for example through an appropriate buffer of</li> </ul>		Site 2 - <b>15 years</b> <del>30 years</del>		Site 3 - <b>15 years</b> <del>Permanent</del>	
	Site 2 - <b>15 years</b> <del>30 years</del>							
	Site 3 - <b>15 years</b> <del>Permanent</del>							

Mod. No.	Paragraph / Policy Reference	Original Text	Amendment	Significant Impact(s) / Impact on Sustainability Appraisal
			<p>at least 15m and through the assessment of potential hydrological impacts with appropriate protection. Existing vegetation to the south of the site should be protected and retained.</p> <ul style="list-style-type: none"> <li>• Those areas of archaeological deposits preserved in-situ from the extraction phase shall be included as part of any restoration scheme.</li> <li>• The impacts from the proposal need to be addressed on the designated buildings located in the vicinity - especially on the setting of the Church of All Saints.</li> <li>• The site layout should ensure a sequential approach is adopted whereby areas of greater vulnerability, such as buildings and stockpiles are located in Flood Zone 1.</li> <li>• Careful consideration must be given to the final restoration contours to ensure the final landform blends with the surrounding topography and the restoration would be predominantly back to agricultural use given the presence of Grade 2 agricultural soil.</li> </ul> <p>The following specific issues and opportunities are to be addressed for Site 2:</p> <ul style="list-style-type: none"> <li>• <del>Waste shall be restricted to stable non-reactive hazardous waste. No liquids, slurries, sludges, clinical wastes or oils shall be deposited on site.</del></li> <li>• Residential property off Canfield Drive with views of the site should be protected by appropriate bunding/screening. Gaps in hedging on the boundary should be addressed to screen views.</li> </ul>	

Mod. No.	Paragraph / Policy Reference	Original Text	Amendment	Significant Impact(s) / Impact on Sustainability Appraisal
			<ul style="list-style-type: none"> <li>• The site is adjacent to a Local Wildlife Site (UFD 172 – Runnels Hey), and area of Ancient Woodland. This site must be protected for example, through an appropriate buffer.</li> <li>• To demonstrate that there would not be an adverse effect on a European site through HRA. <b>Any development would need to ensure that there would not be an adverse impact on water quality.</b> <del>Most likely potential impacts to consider would be caused by water pollution.</del></li> <li>• A hydrological assessment should be undertaken.</li> <li>• Those areas of archaeological deposits preserved in-situ from the extraction phase shall be included as part of any restoration scheme.</li> <li>• The impacts from the proposal need to be addressed on the designated buildings located in the vicinity - especially on the setting of Church of All Saints.</li> <li>• PRoW footpaths Great Canfield 2 and Little Canfield 8 cross the site and would require temporary diversion during operations.</li> <li>• Careful consideration must be given to the final restoration contours to ensure the final landform blends with the surrounding topography and the restoration would be predominantly back to agricultural use given the presence of Grade 2 agricultural.</li> </ul> <p>The following specific issues and opportunities are to be addressed for Site 3:</p> <ul style="list-style-type: none"> <li>• An archaeological evaluation should be undertaken to</li> </ul>	

Mod. No.	Paragraph / Policy Reference	Original Text	Amendment	Significant Impact(s) / Impact on Sustainability Appraisal																
			<p>assess the area for surviving archaeological deposits. This should comprise a programme of trial trenching covering the total area of development. If deposits are identified then an appropriate mitigation strategy for preservation in situ or preservation by excavation should be submitted.</p> <ul style="list-style-type: none"> <li>Any proposal shall include planting to screen development on south and east boundaries of the site.</li> </ul>																	
17	Table 14 – Morses Lane, Brightlingsea	<p>See Appendix 15</p> <p>Morses Lane Site Assessment Scores:</p> <ul style="list-style-type: none"> <li>“3D – Proximity to Sensitive Receptors” – Amber 3</li> <li>“3K – Recreation Facilities” – Green</li> </ul>	<p>See Appendix 15</p> <p><b>Appendix 15 – Table 14 Morses Lane, Brightlingsea</b></p> <table border="1" data-bbox="831 788 1655 1388"> <tr> <td><b>District</b></td> <td>Tendring</td> </tr> <tr> <td><b>Area</b></td> <td>1.82ha</td> </tr> <tr> <td><b>Indicative Facility Scale</b></td> <td>75,000tpa</td> </tr> <tr> <td><b>Link to Waste and Mineral Activities</b></td> <td>N/A</td> </tr> <tr> <td><b>Site Allocation For</b></td> <td>Inert Waste Recycling Capacity</td> </tr> <tr> <td><b>Access</b></td> <td>Morses Lane</td> </tr> <tr> <td><b>Estimated Availability</b></td> <td>Immediately</td> </tr> <tr> <td><b>Life</b></td> <td>Permanent</td> </tr> </table>	<b>District</b>	Tendring	<b>Area</b>	1.82ha	<b>Indicative Facility Scale</b>	75,000tpa	<b>Link to Waste and Mineral Activities</b>	N/A	<b>Site Allocation For</b>	Inert Waste Recycling Capacity	<b>Access</b>	Morses Lane	<b>Estimated Availability</b>	Immediately	<b>Life</b>	Permanent	<p>There will be no significant sustainability effects, or changes to the SA, as a result of this modification.</p>
<b>District</b>	Tendring																			
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			<p>This undeveloped site on the edge of an urban area adjoins an existing waste operation. The following specific issues and opportunities are to be addressed:</p> <ul style="list-style-type: none"> <li>• To demonstrate that it could not have an adverse effect on European sites through HRA. Most likely potential impacts would be by exhaust emissions (from the road into Brightlingsea) and disturbance to birds.</li> <li>• Site should be screened by planting on the north, south and west sides of the site to mitigate visual and landscape effects.</li> <li>• A trial trenching evaluation should be undertaken to assess the area for surviving archaeological deposits. If deposits are identified then an appropriate mitigation strategy should be submitted.</li> <li>• <b>It is expected that operations would be enclosed within an appropriate building.</b> Dust mitigation measures, limits on duration (hours of operation) and noise standards (from noise sensitive properties) will be established in the interests of protecting local amenity.</li> <li>• <b>The configuration and operation of the proposed facility shall have regard to impacts on neighbouring land uses, including the potential impacts on the adjacent retail use.</b></li> </ul>	
18	Table 15 –	See Appendix 16	See Appendix 16	There will be no

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	Newport Quarry		<p><b>Appendix 16 – Table 15 Newport Quarry</b></p> <table border="1" data-bbox="831 416 1655 1094"> <tr> <td><b>District</b></td> <td>Uttlesford</td> </tr> <tr> <td><b>Area</b></td> <td>8.4ha</td> </tr> <tr> <td><b>Indicative Facility Scale</b></td> <td>15,000tpa - Inert Waste Recycling Capacity 300,000m3 - Inert Landfill Capacity</td> </tr> <tr> <td><b>Link to Waste and Mineral Activities</b></td> <td>ESS/17/12/UTT granted planning permission for chalk extraction</td> </tr> <tr> <td><b>Site Allocation For</b></td> <td>Inert Landfill Capacity Inert Waste Recycling Capacity</td> </tr> <tr> <td><b>Access</b></td> <td>Via Unnamed Road to B1383 London Road</td> </tr> <tr> <td><b>Estimated Availability</b></td> <td>Up to 5 years</td> </tr> <tr> <td><b>Life</b></td> <td>Until 2042</td> </tr> </table> <p>This site is within an existing quarry. The following specific issues and opportunities are to be addressed:</p> <ul style="list-style-type: none"> <li>• The site should continue to be restored to <b>lowland</b> calcareous grassland, with areas also retained to demonstrate its geological importance.</li> <li>• <del>Areas already restored should not undergo any further development except to ensure that the chalk grassland</del></li> </ul>	<b>District</b>	Uttlesford	<b>Area</b>	8.4ha	<b>Indicative Facility Scale</b>	15,000tpa - Inert Waste Recycling Capacity 300,000m3 - Inert Landfill Capacity	<b>Link to Waste and Mineral Activities</b>	ESS/17/12/UTT granted planning permission for chalk extraction	<b>Site Allocation For</b>	Inert Landfill Capacity Inert Waste Recycling Capacity	<b>Access</b>	Via Unnamed Road to B1383 London Road	<b>Estimated Availability</b>	Up to 5 years	<b>Life</b>	Until 2042	significant sustainability effects, or changes to the SA, as a result of this modification.
<b>District</b>	Uttlesford																			
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			<p><del>develops into Priority Habitat Lowland Calcareous Grassland and/or Open Mosaic Habitat, improve any other existing biodiversity and to retain the sand piles.</del></p> <p><b>Careful consideration of the environmental and visual impacts of the waste development will be necessary as part of a planning application, particularly if a proposal relates to already restored areas. Specifically, ecological enhancement of the site would be sought, with the final restoration and long-term aftercare expected to result in the creation of lowland calcareous grassland priority habitat. It will be necessary to consider phased working to avoid the loss of existing species.</b></p> <ul style="list-style-type: none"> <li>• Retain existing trees and hedges to screen views of site. Consider new planting to screen views into site.</li> <li>• No development should occur outside the quarried areas as this will have the potential to impact important archaeological deposits.</li> <li>• Dust mitigation measures, limits on duration (hours of operation) and noise standards (from noise sensitive properties) will be established in the interests of protecting local amenity.</li> <li>• A vehicle <del>routing</del> <b>routeing</b> agreement is required to ensure the site would be accessed via the existing access to Newport Quarry and via the Main Road Network <b>(B1383). The number of heavy vehicle movements to and from the east shall be limited to those serving Widdington only.</b></li> <li>• Consideration would need to be given at the planning</li> </ul>	



Mod. No.	Paragraph / Policy Reference	Original Text	Amendment	Significant Impact(s) / Impact on Sustainability Appraisal										
			application stage to the safe operation of the road bridge over the railway line west of the site access and the requirement for any additional traffic management.											
19	Table 16 – Rivenhall	Indicative Facility Scale:  AD 85,000tpa  CHP 360,000tpa	Indicative Facility Scale:  AD <del>85,000tpa</del> <b>30,000tpa</b>  CHP <del>360,000tpa</del> <b>595,000tpa</b>	There will be no significant sustainability effects, or changes to the SA, as a result of this modification.										
20	Table 17 – Sandon	Indicative Facility Scale:  40,000 tpa – Inert Waste Recycling Capacity	Indicative Facility Scale:  <del>40,000 tpa</del> <b>300,000 tpa</b> – Inert Waste Recycling Capacity	There will be no significant sustainability effects, or changes to the SA, as a result of this modification.										
21	Table 19 – Sunnymead, Elmstead and Heath Farms	See Appendix 17	<p><b>Appendix 17 – Table 19 Sunnymead</b></p> <table border="1"> <tr> <td><b>District</b></td> <td>Tendring</td> </tr> <tr> <td><b>Area</b></td> <td>Site 1: 63.74ha <b>Site 2: 7ha</b></td> </tr> <tr> <td><b>Indicative Facility Scale</b></td> <td>Site 1: 1,800,000m<sup>3</sup> <b>Site 2: 40,000tpa</b></td> </tr> <tr> <td><b>Link to Waste and Mineral Activities</b></td> <td>Site is allocated for extraction within the MLP 2014 (site A20)</td> </tr> <tr> <td><b>Site Allocation</b></td> <td>Site 1: Inert Landfill <b>Site 2: Inert Waste Recycling</b></td> </tr> </table>	<b>District</b>	Tendring	<b>Area</b>	Site 1: 63.74ha <b>Site 2: 7ha</b>	<b>Indicative Facility Scale</b>	Site 1: 1,800,000m <sup>3</sup> <b>Site 2: 40,000tpa</b>	<b>Link to Waste and Mineral Activities</b>	Site is allocated for extraction within the MLP 2014 (site A20)	<b>Site Allocation</b>	Site 1: Inert Landfill <b>Site 2: Inert Waste Recycling</b>	The allocation of Sunnymead, Elmstead and Heath Farms in Tendring (W36) for inert waste recycling will have environmental effects, however none that are significant. There will be a number of changes to the Regulation 19 Pre-Submission SA Environmental
<b>District</b>	Tendring													
<b>Area</b>	Site 1: 63.74ha <b>Site 2: 7ha</b>													
<b>Indicative Facility Scale</b>	Site 1: 1,800,000m <sup>3</sup> <b>Site 2: 40,000tpa</b>													
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<b>Site Allocation</b>	Site 1: Inert Landfill <b>Site 2: Inert Waste Recycling</b>													

Mod. No.	Paragraph / Policy Reference	Original Text	Amendment	Significant Impact(s) / Impact on Sustainability Appraisal								
			<table border="1" data-bbox="842 309 1615 536"> <tr> <td data-bbox="842 309 1055 344"><b>For</b></td> <td data-bbox="1055 309 1615 344"></td> </tr> <tr> <td data-bbox="842 344 1055 421"><b>Access</b></td> <td data-bbox="1055 344 1615 421">Current haul road associated with the mineral workings</td> </tr> <tr> <td data-bbox="842 421 1055 497"><b>Estimated Availability</b></td> <td data-bbox="1055 421 1615 497">2018</td> </tr> <tr> <td data-bbox="842 497 1055 536"><b>Life</b></td> <td data-bbox="1055 497 1615 536"><b>17 years</b></td> </tr> </table> <p data-bbox="819 576 1615 643">The following specific issues and opportunities are to be addressed:</p> <ul data-bbox="869 651 1615 1431" style="list-style-type: none"> <li data-bbox="869 651 1615 794">• The site would be an extension to the existing Wivenhoe Quarry, linked by a haul route to the existing processing plant and utilising the existing highway access onto the B1027.</li> <li data-bbox="869 802 1615 869">• Improvements required to visibility at the junction of the private access and Keelers Tye.</li> <li data-bbox="869 877 1615 1093">• Restoration provides the opportunity for significant biodiversity enhancement and habitat creation on site. In-filling and restoration should be in line with habitat creation and outcomes sought in the Minerals Local Plan and any associated documents.</li> <li data-bbox="869 1101 1615 1209">• To demonstrate that it could not have an adverse effect on European sites through HRA. Most likely potential impacts would be caused by disturbance.</li> <li data-bbox="869 1217 1615 1321">• <del>Those areas of archaeological deposits preserved in-situ from the extraction phase shall be included as part of any restoration scheme.</del></li> <li data-bbox="869 1329 1615 1431">• <b>An archaeological desk based assessment would be required to investigate the gravels to establish their potential for Palaeolithic</b></li> </ul>	<b>For</b>		<b>Access</b>	Current haul road associated with the mineral workings	<b>Estimated Availability</b>	2018	<b>Life</b>	<b>17 years</b>	<p data-bbox="1688 309 2033 746">Report. Site 2 within Sunnymead (W36) is a new allocation that was previously not appraised within the SA for inert waste recycling. The implications of this allocation are covered in more detail in Section 3 of this report.</p>
<b>For</b>												
<b>Access</b>	Current haul road associated with the mineral workings											
<b>Estimated Availability</b>	2018											
<b>Life</b>	<b>17 years</b>											

Mod. No.	Paragraph / Policy Reference	Original Text	Amendment	Significant Impact(s) / Impact on Sustainability Appraisal
			<p><b>remains and trial trench evaluation will be required, along with a mitigation strategy, to form part of the Environmental Statement.</b></p> <ul style="list-style-type: none"> <li>• <b>The infilling must return the site to original ground levels and to agricultural use. Woodland planting of an appropriate species/character, scale etc must be considered to ensure compatibility with adjacent Ancient Woodland.</b></li> <li>• PRoW footpath Elmstead 24 crosses the site 1 and is adjacent to site 2, and requires sufficient stand-off distance and protection during operations (e.g., satisfactory crossing point(s) provided for quarry vehicles).</li> <li>• Dust mitigation measures, limits on duration (hours of operation) and noise standards (from noise sensitive properties) will be established in the interests of protecting local amenity.</li> <li>• Careful consideration must be given to the final restoration contours used to ensure the final landform blends with the surrounding topography and to ensure Grade 2 agricultural soils are retained on site.</li> </ul> <p><b>The following specific issues and opportunities are to be addressed for Site 1:</b></p> <ul style="list-style-type: none"> <li>• <b>A minimum of 100m standoff should be provided for all residential properties and effective screening provided to screen views of the site.</b></li> </ul>	

Mod. No.	Paragraph / Policy Reference	Original Text	Amendment	Significant Impact(s) / Impact on Sustainability Appraisal
			<ul style="list-style-type: none"> <li>• Cockaynes Wood Local Wildlife Site adjoins the southern boundary and would require protection during operations.</li> <li>• Footpaths Elmstead 19 and Alresford 2 also run along the southern boundary and through Cockaynes Wood and need protection during operations. The ability to reinstate these fully needs to be investigated as part of the suggested restoration scheme.</li> </ul> <p><b>The following specific issues and opportunities are to be addressed for Site 2:</b></p> <ul style="list-style-type: none"> <li>• <b>Bunding is required on north, east and south sides to screen the site.</b></li> <li>• <b>To demonstrate that it could not have an adverse effect on European sites through HRA. Most likely potential impacts would be caused by disturbance.</b></li> </ul>	
22	Table 20 – Wivenhoe Quarry Plant Area	N/A	Removal of the site allocation to reflect that the facility is now included as part of Sunnymead, Elmstead and Heath Farms.	The removal of site W13 Wivenhoe Quarry for inert waste recycling as an allocation within the Plan will not have any significant environmental effects. The facility is now allocated as part of Sunnymead,

Mod. No.	Paragraph / Policy Reference	Original Text	Amendment	Significant Impact(s) / Impact on Sustainability Appraisal								
				<p>Elmstead and Heath Farms in Tendring (W36). This leads to a number of changes to the Regulation 19 Pre-Submission SA Environmental Report. The implications of this allocation are covered in more detail in Section 3 of this report in response to Main Modification 21.</p>								
23	Table xx <sup>1</sup> – Dollymans Farm	Site not allocated at Pre-Submission stage.	<p><b>Appendix 18 – Table xx – Dollymans Farm</b></p> <table border="1" data-bbox="842 898 1615 1126"> <tr> <td><b>District</b></td> <td><b>Basildon/Rochford</b></td> </tr> <tr> <td><b>Area</b></td> <td><b>16.09ha</b></td> </tr> <tr> <td><b>Indicative Facility Scale</b></td> <td><b>500,000 tonnes</b></td> </tr> <tr> <td><b>Link to</b></td> <td><b>The site constitutes a former</b></td> </tr> </table>	<b>District</b>	<b>Basildon/Rochford</b>	<b>Area</b>	<b>16.09ha</b>	<b>Indicative Facility Scale</b>	<b>500,000 tonnes</b>	<b>Link to</b>	<b>The site constitutes a former</b>	<p>The allocation of Dollymans Farm in Basildon/Rochford (L(i)16) for inert landfill will have significant environmental effects in addition to a number of changes to</p>
<b>District</b>	<b>Basildon/Rochford</b>											
<b>Area</b>	<b>16.09ha</b>											
<b>Indicative Facility Scale</b>	<b>500,000 tonnes</b>											
<b>Link to</b>	<b>The site constitutes a former</b>											

<sup>1</sup> Table numbering to be confirmed prior to Adoption

Mod. No.	Paragraph / Policy Reference	Original Text	Amendment		Significant Impact(s) / Impact on Sustainability Appraisal	
			<b>Waste and Mineral Activities</b>	<b>mineral borrow pit.</b>	the Regulation 19 Pre-Submission SA Environmental Report. These implications are covered in more detail in Section 3 of this report.	
<b>Site Allocation For</b>	<b>Inert Landfill Capacity</b>	<b>Access</b>	<b>Via private road adjoining A130</b>	<b>Estimated Availability</b>		<b>2017</b>
<b>Life</b>	<b>Up to 5 years</b>	<p><b>This site would culminate in the restoration of a former mineral void. The following specific issues and opportunities are to be addressed:</b></p>				
<ul style="list-style-type: none"> <li><b>All access should be via the A129. A Transport Assessment would be required at the planning application stage to review access arrangements and examine safety and capacity of the local road network. This may result in the diversion of bridleway to segregate users from vehicles or other mitigation works.</b></li> </ul>						
<ul style="list-style-type: none"> <li><b>Restoration of the site through this allocation provides the opportunity for biodiversity, landscape and visual enhancement. Careful consideration of the environmental impacts of the waste development will be necessary as part of a planning application with proportionate levels of mitigation to be established. Specifically, the WPA</b></li> </ul>						

Mod. No.	Paragraph / Policy Reference	Original Text	Amendment	Significant Impact(s) / Impact on Sustainability Appraisal				
			<p><b>would seek the overall landscape improvement of the site, with the final restoration and long-term aftercare to be beneficial to the Green Belt and biodiversity.</b></p> <ul style="list-style-type: none"> <li>• <b>Retain trees and shrubs to screen plant and materials from the road. Consider new planting and bunding to screen views into the site.</b></li> <li>• <b>Dust mitigation measures, limits on duration (hours of operation) and noise standards (from noise sensitive properties) will be established in the interests of protecting local amenity.</b></li> <li>• <b>An Archaeological Desk Based Assessment should be carried out to identify the extent of preservation within the northern part of the site and preservation requirements around war memorials.</b></li> <li>• <b>Areas of archaeological deposits preserved in situ will require excavation if working is likely to cause ground disturbance in the north western part of the site</b></li> <li>• <b>A management proposal for the survival and maintenance of the memorial for the burial sites should be submitted with any application.</b></li> </ul>					
24	Table 21 – Development in Waste Consultation Areas	<p>See Appendix 19</p> <p>The original safeguarding table (Table 21) highlighted that all ‘change of use’</p>	<p>See Appendix 19</p> <p><b>Appendix 19 – Table 21 Development in Waste Consultation Area</b></p> <table border="1" data-bbox="831 1345 1659 1417"> <thead> <tr> <th data-bbox="831 1345 1395 1417">Nature of Development</th> <th data-bbox="1395 1345 1659 1417">Included or Excluded from</th> </tr> </thead> <tbody> <tr> <td style="height: 20px;"></td> <td></td> </tr> </tbody> </table>	Nature of Development	Included or Excluded from			<p>There will be no significant sustainability effects, or changes to the SA, as a result of this modification.</p>
Nature of Development	Included or Excluded from							

Mod. No.	Paragraph / Policy Reference	Original Text	Amendment		Significant Impact(s) / Impact on Sustainability Appraisal
		<p>applications were to be included within the scope of Policy 2 – Safeguarding Waste Management Sites and Infrastructure</p> <p>Removal from Table 21 of the row stating that ‘Applications for temporary buildings, structures or uses (for up to five years)’ were to be ‘Included’ within the scope of Policy 2.</p>		<p><b>consultation with the Waste Planning Authority</b></p>	
			<p>Applications for development on land, which is already allocated in adopted local development plan documents.</p>	<p>Included</p>	
			<p>Proposals for minor infilling of development within the defined settlement limits for towns, villages and hamlets identified in adopted local development plan documents.</p>	<p>Included</p>	
			<p>Applications for householder development including:</p> <ul style="list-style-type: none"> <li>• Construction of a replacement dwelling where the new dwelling occupies the same or similar footprint to the building being replaced;</li> <li>• Minor extensions to existing dwellings or properties where they lie within the immediate curtilage and would not bring the building within 250m of the boundary of an existing strategic facility or preferred site allocation;</li> <li>• Proposals for the provision of incidental and non-habitable structures lying within the</li> </ul>	<p>Excluded</p>	



Mod. No.	Paragraph / Policy Reference	Original Text	Amendment		Significant Impact(s) / Impact on Sustainability Appraisal
			curtilage of an existing dwelling (such as driveways, garages, car parks and hard standing).		
			Proposals for the erection of agricultural buildings immediately adjacent to an existing working farmstead.	Excluded	
			<p>Applications: <del>for change of use.</del></p> <ul style="list-style-type: none"> <li>• <b>From B2/B8 to any other use</b></li> <li>• <b>To Class A and C, from any other use</b></li> </ul>	Included	
			<b>Other applications for change of use.</b>	<b>Excluded</b>	
			Applications for temporary buildings, structures or uses (for up to five years).	Included	
			Applications related to existing permissions such as for reserved matters, or for minor amendments to current permissions.	Excluded	
			Applications for other kinds of consent – advertisements; listed building consent; Conservation Area consent and proposals for work to trees or removal of hedgerows.	Excluded	
			Proposals for the demolition of a residential or other building.	Excluded	
			Proposals for minor works such as	Excluded	

Mod. No.	Paragraph / Policy Reference	Original Text	Amendment	Significant Impact(s) / Impact on Sustainability Appraisal						
			<table border="1"> <tr> <td data-bbox="831 304 1395 341">fencing or bus shelters.</td> <td data-bbox="1395 304 1659 341"></td> </tr> <tr> <td data-bbox="831 341 1395 416">Proposal for any extension of and/or change to the curtilage of property.</td> <td data-bbox="1395 341 1659 416">Included</td> </tr> <tr> <td data-bbox="831 416 1395 531">Proposals for B2 and B8 development on land allocated for such uses.</td> <td data-bbox="1395 416 1659 531">Excluded</td> </tr> </table> <p data-bbox="801 571 1597 643">(The inclusion of temporary development to be included within the scope of Policy 2 is addressed in MAIN 26)</p>	fencing or bus shelters.		Proposal for any extension of and/or change to the curtilage of property.	Included	Proposals for B2 and B8 development on land allocated for such uses.	Excluded	
fencing or bus shelters.										
Proposal for any extension of and/or change to the curtilage of property.	Included									
Proposals for B2 and B8 development on land allocated for such uses.	Excluded									
25	C2	However, it is neither practicable nor necessary for consultation to occur on all developments proposed through planning applications. The table below sets the developments proposed to be subject to consultation with the Waste Planning Authorities:	However, it is neither practicable nor necessary for consultation to occur on all developments proposed through planning applications. The table below sets the developments proposed to be subject to consultation with the Waste Planning Authorities: <b>The development types below include those relating to temporary structures and uses:</b>	There will be no significant sustainability effects, or changes to the SA, as a result of this modification.						
26	Map 51 – Oakwood and Crusader Business Parks	N/A	Removal of Map as the site is no longer being considered as an Area of Search.	There will be no significant sustainability effects, or changes to the SA, as a result of this						

Mod. No.	Paragraph / Policy Reference	Original Text	Amendment	Significant Impact(s) / Impact on Sustainability Appraisal
				modification.

### 3 Significant Sustainability Effects and Changes to the SA as a result of Main Modifications

The following sections set out the detailed implications of the Main Modifications to the Plan regarding significant sustainability impacts and changes to the SA of the Regulation 19 Pre-Submission plan.

#### 3.1 Main Modifications 5 & 23– The Allocation of Dollymans Farm (L(i)16) as a Strategic Site Allocation for Inert Landfill

The inclusion of Dollymans Farm (L(i)16) as an inert landfill allocation will have implications regarding the SA. This modification will affect elements of the SA and these are addressed in the following sub-section of this report.

##### Element of the SA - 4.1.14 Significant Effects of Inert Landfill Allocations

Sites for: INERT LANDFILL														
Site Ref.	Temp Effect	Sustainability Objectives (SO)												
		1	2	3	4	5	6	7	8	9	10	11	12	13
L(n)7R Little Bullocks A22	S / M	/	--	--	++	/	/	/	0	+	+	--	++	+
	L	/	--	--	/	0	/	0	0	0	0	/	0	0
L(n)1R Slough Farm	S / M	+	--	++	++	/	/	++	0	+	/	--	+	++
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
L(i)10 Blackley (Site 1)	S / M	+	--	++	++	+	/	++	0	+	+	--	++	++
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
L(i)6 Sandon	S / M	-	--	--	++	+	/	++	0	++	/	--	++	++
	L	/	--	--	/	0	/	0	0	0	0	/	0	0
L(i)5 Sunnym- ead	S / M	/	--	++	++	/	++	/	0	+	/	--	+	++
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
L(i)17R Newport Quarry	S / M	/	--	++	-	+	++	++	0	+	/	--	+	+
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
L(n)5 Bellhou- se	S / M	/	--	++	++	+	+	/	0	++	+	--	++	++
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
L(i)15 Fingring- hoe	S / M	/	--	++	/	+	++	++	0	++	++	--	++	++
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
L(i)16 Dollym- ans	S / M	+	--	--	/	+	--	++	0	+	+	--	++	++
	L	/	--	--	/	0	++	0	0	0	0	/	0	0

**Additional / Amended Text**

Recycling processes involve the removal of materials such as wood, plastic and metal, a process that can be carried out at both enclosed and open-air facilities. Locally collected evidence suggests that there is further diversion from landfill through beneficial re-use of inert waste, which equated to approximately 765,000tpa in 2014. It is estimated that there is a current inert landfill void space of approximately 3.4 million m<sup>3</sup>, which would equate to approximately 5.1 million tonnes of CDE disposal capacity. This is, however, not sufficient to accommodate the forecasted need for inert landfill over the Plan period. To address this previous shortfall, 500,000tpa of inert waste landfill capacity has been allocated at Dollymans Farm, Basildon / Rochford post-Examination and as a result of the Inspector's recommendation.

There will be significant negative impacts associated with the location of Dollymans (L(i)16) within the Metropolitan Green Belt and associated landscape impacts. Despite this, the site would correspond to the restoration of a minerals void, and as such can be expected to have significant positive impacts in the long term. This has led to a change in the long term impacts highlighted for landscape (SO6), particularly in recognition of the development principle regarding such restoration. While parts of the site are located within Flood Zone 3, these are relatively small when compared to the size of the site. With this in mind, impacts regarding flood risk (SO3) can be expected to be mitigated through Policy 10 Development Management Criteria and the policy's supporting text. It should also be noted that further justification would be through Sequential and Exceptions Testing.

**Element of the SA - Table 10: Cumulative Impacts of sites W3, W20 and L(i)16**

Site Ref.	Temp Effect	Sustainability Objectives (SO)												
		1	2	3	4	5	6	7	8	9	10	11	12	13
W3 Basildon WWTW	S / M	/	-	/	/	+	/	++	0	++	+	-	++	++
	L	/	-	/	/	+	/	++	0	++	+	/	++	++
W20 Courtauld Road	S / M	/	-	++	/	++	/	++	0	++	+	-	+	++
	L	/	-	++	/	++	/	++	0	++	+	/	+	++
L(i)16 Dollymans	S / M	+	--	--	/	+	--	++	0	+	+	--	++	++
	L	/	--	--	/	0	++	0	0	0	0	/	0	0

**Additional / Amended Text**

- As can be seen from the above comparative assessments of the sites W3, W20 and L(i)16 in Basildon, there are a number of significant positive impacts associated with minimising environmental effects, and in the sustainable management of waste (SO9).
- The cumulative impact of these sites on the localised transport network (SO10) would have to be explored in further detail for sites W3 and W20, due to the sites being located in very close proximity to another however this would not apply to site L(i)16 in response to the development principle that access should be via the A129. This was an issue raised in the SA of the Revised Preferred Approach (2015) regarding sites W3 and W20. Since then, development principles for the sites have been included within the Plan to address specific issues and / or opportunities. With regard to site W3 Basildon WWTW, confirmation will be needed as to how internal access arrangements in relation to Courtauld Road in order to adequately alleviate any cumulative impacts.

**Element of the SA - Table 29: Appraisal of sites put forward for Open Air Facilities: Inert Landfill Sites**

Sites for: INERT LANDFILL SITES														
Site Ref.	Temp Effect	Sustainability Objectives (SO)												
		1	2	3	4	5	6	7	8	9	10	11	12	13
L(i)4R	S / M	/	--	++	++	/	--	/	0	++	/	--	+	++
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
Reason for rejection		<p>The site is within the Green Belt. Although the site is allocated for minerals extraction in the Minerals Local plan (2014), no planning application has come forward. This extraction site has a 14 year estimated life (as indicated within the Minerals Local Plan) and as such the site is not available for allocation in the Waste Local Plan within the Plan period. In addition, the Minerals Local Plan indicates that the site would be restored to low levels only.</p>												
L(i)5	S / M	/	--	++	++	/	++	/	0	+	/	--	+	++
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
Allocated Site – Reason for allocation:		<p>The site scored highly against other sites considered for allocation in the Waste Site Assessment Report. It is also considered suitable to meet the capacity gap requirements and conforms to the general principles of the Spatial Strategy and the proximity principle.</p> <p>The decision to prioritise sites for the treatment of biological waste over inert waste recycling and also not to take sites forward where located in the greenbelt has resulted in fewer sites being available for inert waste treatment. As a consequence, the need for sites suitable for inert waste landfill has increased. There is therefore a continued need for the same preferred sites previously identified in the Revised Preferred Approach as L(i)10R Blackley Quarry, L(n)7R – Little Bullocks Farm site, L(n)1R Slough Farm, L(i)6 Sandon and L(i)5 Sunnymead, Elmstead and Heath Farms, with the addition of site L(i)16 Dollymans Farm to meet the shortfall in inert landfill capacity.</p>												
L(i)6	S / M	-	--	--	++	+	/	++	0	++	/	--	++	++
	L	/	--	--	/	0	/	0	0	0	0	/	0	0
Allocated Site – Reason for allocation:		<p>The site scored highly against other sites considered for allocation in the Waste Site Assessment Report. It is also considered suitable to meet the capacity gap requirements and conforms to the general principles of the Spatial Strategy and the proximity principle.</p> <p>The decision to prioritise sites for the treatment of biological waste over inert waste recycling and also not to take sites forward where located in the greenbelt has resulted in fewer sites being available for inert waste treatment. As a consequence, the need for sites suitable for inert waste landfill has increased. There is therefore a continued need for the same preferred sites previously identified in the Revised Preferred Approach as L(i)10R Blackley Quarry, L(n)7R – Little Bullocks Farm site, L(n)1R Slough Farm, L(i)6 Sandon and L(i)5 Sunnymead, Elmstead and Heath Farms, with the addition of site L(i)16 Dollymans Farm to meet the shortfall in inert landfill capacity.</p>												
L(i)7R	S / M	/	--	++	++	/	++	/	0	++	+	--	++	++
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
Safeguarded site – Reason for		<p>The grant of planning permission for this activity means that this site must now be considered to contribute towards the total waste capacity in the Plan Area.</p>												

<b>safeguarding:</b>		Allocation of the site to support this activity is therefore unnecessary.												
L(i)10R	S / M	+	--	++	++	+	/	++	0	+	+	--	++	++
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
<b>Allocated Site – Reason for allocation:</b>		<p>The site scored highly against other sites considered for allocation in the Waste Site Assessment Report. It is also considered suitable to meet the capacity gap requirements and conforms to the general principles of the Spatial Strategy and the proximity principle.</p> <p>The decision to prioritise sites for the treatment of biological waste over inert waste recycling and also not to take sites forward where located in the greenbelt has resulted in fewer sites being available for inert waste treatment. As a consequence, the need for sites suitable for inert waste landfill has increased. There is therefore a continued need for the same preferred sites previously identified in the Revised Preferred Approach as L(i)10R Blackley Quarry, L(n)7R – Little Bullocks Farm site, L(n)1R Slough Farm, L(i)6 Sandon and L(i)5 Sunnymead, Elmstead and Heath Farms, with the addition of site L(i)16 Dollymans Farm to meet the shortfall in inert landfill capacity.</p>												
L(i)13	S / M	/	--	++	/	+	/	/	0	++	/	--	+	+
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
<b>Reason for rejection:</b>		There is an application for another incompatible use (housing) on the site which is pending.												
L(i)15	S / M	/	--	++	/	+	++	++	0	++	++	--	++	++
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
<b>Allocated Site – Reason for allocation:</b>		<p><i>Fingringhoe Quarry (Li15) was submitted as a site suitable for inert waste landfill by the landowner as part of the call for sites. Despite scoring well in the Waste Site Assessment Report, and being considered suitable for inert waste disposal, at the Revised Preferred Approach (2015) stage the WPAs chose not to include Fingringhoe Quarry as a preferred site allocation where it was considered that the inert fill material to be used at this site would be entirely sourced from London and imported to the site by barge via Ballast Quay Wharf. Waste arising in Essex or Southend-on-Sea would not be used to fill the void space (currently being created by the extraction of sand and gravel) and thus the site was not taken forward.</i></p> <p><i>Since then the site promoter, through their representation (through the Revised Preferred Approach [2015] consultation) and subsequent correspondence, has been able to satisfy the Waste Planning Authorities that a reasonable portion of inert fill material to be used at this site can be sourced from within the Plan Area. For this reason, and the fact that an existing mineral void exists at the quarry, the site has now been allocated to contribute in meeting void space requirements.</i></p>												
L(i)16	S / M	+	--	--	/	+	--	++	0	+	+	--	++	++
	L	/	--	--	/	0	++	0	0	0	0	/	0	0
<b>Allocated Site – Reason for allocation:</b>		The site scored highly against other sites considered for allocation in the Waste Site Assessment Report. It is also considered suitable to meet the capacity gap requirements and conforms to the general principles of the Spatial Strategy and the proximity principle.												

		<p>The decision to prioritise sites for the treatment of biological waste over inert waste recycling and also not to take sites forward where located in the greenbelt has resulted in fewer sites being available for inert waste treatment. As a consequence, the need for sites suitable for inert waste landfill has increased. There is therefore a continued need for the same preferred sites previously identified in the Revised Preferred Approach as L(i)10R Blackley Quarry, L(n)7R – Little Bullocks Farm site, L(n)1R Slough Farm, L(i)6 Sandon and L(i)5 Sunnymead, Elmstead and Heath Farms, with the addition of site L(i)16 Dollymans Farm to meet the shortfall in inert landfill capacity, with the addition of site L(i)16 Dollymans Farm to meet the shortfall in inert landfill capacity.</p>												
L(i)17R	S / M	/	--	++	-	+	++	++	0	+	/	--	+	+
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
Allocated Site – Reason for allocation:		<p>Site L(i)17R Newport Quarry was put forward during the Revised Preferred Approach (2015) consultation. The site scored highly against other sites considered for allocation in the Waste Site Assessment Report and was identified as being able to meet inert landfill and recycling needs particularly in the west of the County. For these reasons the site has been allocated for both inert recycling and inert landfill.</p>												
L(n)1R	S / M	+	--	++	++	/	/	++	0	+	/	--	+	++
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
Allocated Site – Reason for allocation:		<p>The site scored highly against other sites considered for allocation in the Waste Site Assessment Report. It is also considered suitable to meet the capacity gap requirements and conforms to the general principles of the Spatial Strategy and the proximity principle.</p> <p>The decision to prioritise sites for the treatment of biological waste over inert waste recycling and also not to take sites forward where located in the greenbelt has resulted in fewer sites being available for inert waste treatment. As a consequence, the need for sites suitable for inert waste landfill has increased. There is therefore a continued need for the same preferred sites previously identified in the Revised Preferred Approach as L(i)10R Blackley Quarry, L(n)7R – Little Bullocks Farm site, L(n)1R Slough Farm, L(i)6 Sandon and L(i)5 Sunnymead, Elmstead and Heath Farms, with the addition of site L(i)16 Dollymans Farm to meet the shortfall in inert landfill capacity.</p>												
L(n)5	S / M	/	--	++	++	+	+	/	0	++	+	--	++	++
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
Allocated Site – Reason for allocation:		<p>Despite scoring well as part of the site selection process the large L(n)5 Bellhouse site (which currently takes non-hazardous wastes and has an agreed restoration plan) was not taken forward as part of the Revised Preferred Approach. This was due to reservations that it was close to other sites in this area near Colchester (such as L(i)7 Stanway). However, given re-assessment it is prudent to now include it as an inert landfill site.</p> <p>It should be noted that a change in a significant positive impact identified in the SA at the Revised Preferred Approach (2015) stage for L(n)5 – Bellhouse has been necessary at this stage regarding SO6 (landscape). This is due to a re-assessment which has established that there would be a minor adverse effect regarding views from receptors (properties and a PROW).</p>												
L(n)7R	S / M	/	--	--	++	/	/	/	0	+	+	/	++	/



	L	/	--	--	/	0	/	0	0	0	0	/	0	0
<b>Allocated Site – Reason for allocation:</b>		<p>The site scored highly against other sites considered for allocation in the Waste Site Assessment Report. It is also considered suitable to meet the capacity gap requirements and conforms to the general principles of the Spatial Strategy and the proximity principle.</p> <p>The decision to prioritise sites for the treatment of biological waste over inert waste recycling and also not to take sites forward where located in the greenbelt has resulted in fewer sites being available for inert waste treatment. As a consequence, the need for sites suitable for inert waste landfill has increased. There is therefore a continued need for the same preferred sites previously identified in the Revised Preferred Approach as L(i)10R Blackley Quarry, L(n)7R – Little Bullocks Farm site, L(n)1R Slough Farm, L(i)6 Sandon and L(i)5 Sunnymead, Elmstead and Heath Farms, with the addition of site L(i)16 Dollymans Farm to meet the shortfall in inert landfill capacity.</p> <p><i>There is also an amendment from the SA of the Revised Preferred Approach (2015) regarding an erroneous impact on the sustainable management of waste (SO9) at site L(n)7R – Little Bullocks Farm Site A22. This is due to the site being Greenfield land with no planning history within the specific red-line boundary of the site. As such, the significant positive impact highlighted at the Revised Preferred Approach (2015) stage SA has been amended to be a minor positive impact. In addition, the site was also previously erroneously judged to have significant positive impacts on flooding (SO3) for certain uses / facilities, however a small amount of the site is within FZ3. As such the site will now have significantly negative impacts on this objective. A re-assessment of the site now also indicates that there will moderate impacts on landscape which will give rise to an uncertain impact on SO6; an amendment of a significantly positive score highlighted in the SA at the Revised Preferred Approach (2015) stage.</i></p>												
L(n)8R	S / M	/	--	++	++	+	-	/	0	+	+	--	++	/
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
<b>Reason for rejection:</b>		<p>This is the only landfill site that has been proposed as suitable for taking hazardous waste, which may be required during the plan period. The site has been allocated for the landfill of hazardous waste and as such rejected for allocation for inert landfill in the Plan.</p> <p><i>There is an amendment from the SA of the Revised Preferred Approach (2015) regarding an erroneous impact on the sustainable management of waste (SO9) at site L(n)8R. This is due to the site being Greenfield land with no planning history within the specific red-line boundary of the site. As such, the significant positive impact highlighted at the Revised Preferred Approach (2015) stage SA has been amended to be a minor positive impact. A re-assessment of the site now also indicates that there will moderate to major effects on landscape which will give rise to a negative impact on SO6; an amendment of an uncertain score highlighted in the SA at the Revised Preferred Approach (2015) stage.</i></p>												

**Additional / Amended Text**

To reflect the allocation of site L(i)16 Dollymans Farm for inert landfill at this stage as per the Inspector's recommendation, it can be seen from the above that only two reasonable options existed; L(i)16 and L(i)4R. The table above indicates two additional alternatives for possible inert waste landfill, however L(i)13 has since been granted outline planning permission for 190 homes, and L(n)8R have been allocated within the Waste Local Plan for taking hazardous waste as the only site submitted to meet such requirements throughout the plan making process.

Of the two reasonable alternatives, L(i)16 has been allocated due to scoring highly against site L(n)4R, its adherence to the spatial strategy and the fact that the majority of the site lies within an old borrow pit that has not been formally restored. The site is within the Green Belt; however it has been independently assessed through the plan-making process as having only a moderate landscape impact. Site L(n)4R is also within the Green belt, however is considerably larger than site L(i)16, and although representing a site allocated for minerals extraction in the Essex County Council Minerals Local Plan (adopted 2014), no planning application has come forward. This extraction site has a 14 year estimated life (as indicated within the Minerals Local Plan) and as such the site is not available for allocation in the Waste Local Plan within the Plan period.

**Element of the SA - Table 37: Cumulative Impacts of sites W3, W20 and L(i)16**

Site Ref.	Temp Effect	Sustainability Objectives (SO)												
		1	2	3	4	5	6	7	8	9	10	11	12	13
W3 Basildon WWTW	S / M	/	-	/	/	+	/	++	0	++	+	-	++	++
	L	/	-	/	/	+	/	++	0	++	+	/	++	++
W20 Courtauld Road	S / M	/	-	++	/	++	/	++	0	++	+	-	+	++
	L	/	-	++	/	++	/	++	0	++	+	/	+	++
L(i)16 Dollymans	S / M	+	--	--	/	+	--	++	0	+	+	--	++	++
	L	/	--	--	/	0	++	0	0	0	0	/	0	0

**Additional / Amended Text**

- As can be seen from the above comparative assessments of the sites W3, W20 and L(i)16 in Basildon, there are a number of significant positive impacts associated with minimising environmental effects, and in the sustainable management of waste (SO9).
- The cumulative impact of these sites on the localised transport network (SO10) would have to be explored in further detail for sites W3 and W20, due to the sites being located in very close proximity to another however this would not apply to site L(i)16 in response to the development principle that access should be via the A129. This was an issue raised in the SA of the Revised Preferred Approach (2015) regarding sites W3 and W20. Since then, development principles for the sites have been included within the Plan to address specific issues and / or opportunities. With regard to site W3 Basildon WWTW, confirmation will be needed as to how internal access arrangements in relation to Courtauld Road in order to adequately alleviate any cumulative impacts.

### 3.2 Main Modification 6 –Supporting Text to Policy 4: Areas of Search

This Main Modification ensures a minor positive impact on Sustainability Objective 13 (SO13), regarding economic growth and employment opportunities. Previously, the original text and relevant appraisal of Policy 4: Areas of Search identified an ‘uncertain’ impact (/) for SO13 due to the ‘possible eventual development of B2 or B8 land for waste management facilities (being) done so to the detriment of any alternative identified employment need in specific sectors and areas.’ This possibility is considered to have been successfully eradicated within the Main Modifications, ensuring the maximum economic potential of employment areas.

As a result, the appraisal of within paragraph 5.1.2 of the Regulation 19 Pre-Submission SA now shows this minor positive impact for SO13, as outlined below.

**Element of the SA - Policy 4 – Areas of Search**

	Sustainability Objectives (SO)												
	1	2	3	4	5	6	7	8	9	10	11	12	13
Short Term	0	/	0	+	0	0	/	0	++	+	0	0	+
Medium Term	0	/	0	+	0	0	/	0	++	+	0	0	+
Long Term	0	/	0	+	0	0	/	0	++	+	0	0	+

### 3.3 Main Modifications 21 & 22 - Sunnymead, Elmstead and Heath Farms & Wivenhoe Quarry Plant Area

#### Element of the SA - 4.1.6 Significant Effects for Inert Waste Recycling Allocations

Sites for: INERT WASTE RECYCLING														
Site Ref.	Temp Effect	Sustainability Objectives (SO)												
		1	2	3	4	5	6	7	8	9	10	11	12	13
W32 Crumps Farm	S / M	/	-	--	-	/	-	/	0	+	+	/	++	+
	L	/	-	--	-	/	-	/	0	+	+	/	++	+
W8 Elsenham	S / M	+	++	++	/	-	-	/	0	+	+	-	++	/
	L	+	++	++	/	-	-	/	0	+	+	/	++	/
W7 Sandon East	S / M	+	-	--	/	+	+	++	0	++	/	-	+	++
	L	+	-	--	/	+	+	++	0	++	/	/	+	++
L(n)1R Slough Farm	S / M	+	-	++	++	/	/	++	0	+	/	-	+	++
	L	+	-	++	++	/	/	++	0	+	/	/	+	++
L(i)10R Blackley (Site 1)	S / M	+	-	++	++	+	/	++	0	+	+	--	++	++
	L	+	-	++	++	+	/	++	0	+	+	/	++	++
W36 Sunnymead (s2)	S / M	/	++	++	-	+	/	++	0	+	/	-	+	++
	L	/	++	++	-	+	/	++	0	+	/	/	+	++
W31 Morses Lane	S / M	+	++	++	/	/	/	/	0	++	+	-	++	++
	L	+	++	++	/	/	/	/	0	++	+	/	++	++
L(i)17R Newport Quarry	S / M	/	-	++	-	+	++	++	0	+	/	-	+	+
	L	/	-	++	-	+	++	++	0	+	/	/	+	+

#### Additional / Amended Text

A 'Site 2' at Sunnymead, Elmstead & Heath Farms, Alresford, Tendring (W36) has been included for allocation as a replacement for site W13 Wivenhoe Quarry Plan Area, Colchester. This new allocation made post-Examination is a direct replacement in terms of capacity and responds similarly to the spatial strategy.

As can be seen from the above, the site will have a range of positive impacts, with only a few minor negative impacts associated with soil quality (the site is within Grade 2 agricultural land) and being in relatively close proximity to a number of sensitive receptors. To address this latter issue, it should be noted that mitigation is sought through the development principle of this site regarding bunding required on the north, east and south sides to screen the site.

The site at Wivenhoe (W13) has been removed due to the fact that extraction at the adjoining Wivenhoe Quarry has ceased and an inert recycling facility is subsequently not needed in this location. Sunnymead, Elmstead & Heath Farms (W36) are allocated within the adopted Minerals Local Plan (2014) for minerals extraction and thus the inert recycling facility has been relocated to this site where such a facility is required. It should be noted that both the Wivenhoe (W13) and Sunnymead (W36) sites have the same operator.

**Element of the SA - Table 9: Cumulative Impacts of sites L(i)15, L(i)5 and W36**

Site Ref.	Temp Effect	Sustainability Objectives (SO)												
		1	2	3	4	5	6	7	8	9	10	11	12	13
W36 Sunny-mead (s2)	S / M	/	++	++	-	+	/	++	0	+	/	-	+	++
	L	/	++	++	-	+	/	++	0	+	/	/	+	++
L(i)15 Fingring-hoe	S / M	/	--	++	/	+	++	++	0	++	++	--	++	++
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
L(i)5 Sunnymead	S / M	/	--	++	++	/	++	/	0	+	/	--	+	++
	L	/	--	++	/	0	/	0	0	0	0	/	0	0

**Additional / Amended Text**

- The sites of W36, L(i)15 and L(i)5 have been grouped where they are located in a broadly similar location, and also in regard to their possible impacts on biodiversity through the international designation of the Colne Estuary as an SPA and Ramsar. In addition to development principles for these sites stating that likely significant effects on the nearby international wildlife sites need to be considered, it should additionally be noted that the Plan, as per the recommendation of the HRA, states that 'planning permission for waste management development within or otherwise affecting an international site (Natura 2000 site) will only be granted where the conclusions of a project-level Habitats Regulations Assessment (HRA), as required for those proposals highlighted within the HRA of the Plan, demonstrate that the proposal will have no adverse impacts on the integrity of any site, either alone or in combination with other plans or projects.' Screening distances are also provided as a guide for potential applicants in relation to the triggers for project-level HRA. The inclusion of this requirement in the Plan will effectively determine whether any impacts on internationally designated sites are likely. Additionally, project-level HRA will also identify the impacts of proposals in combination with other relevant projects, plans and programmes within the Plan Area. As such there will be no cumulative impacts on biodiversity.
- Any cumulative impacts associated with the individual significant negative impacts highlighted for health and well-being (SO11) on all of the sites, are effectively neutralised by development principles that require dust mitigation measures, limits on duration (hours of operation) and noise standards (from noise sensitive properties) in the interests of protecting local amenity.

**Element of the SA - Table 26: Appraisal of sites put forward for Open Air Facilities: Construction, Demolition and Excavation Waste (CD&EW) Recycling Facilities (or inert recycling/soil screening and non-inert recycling)**

Sites for: CONSTRUCTION, DEMOLITION AND EXCAVATION (CD&EW) RECYCLING FACILITIES (OR INERT AND NON-INERT RECYCLING)														
Site Ref.	Temp Effect	Sustainability Objectives (SO)												
		1	2	3	4	5	6	7	8	9	10	11	12	13
L(i)4R	S / M	/	-	++	++	/	--	/	0	++	/	--	/	++
	L	/	-	++	++	/	--	/	0	++	/	/	/	++
Reason for rejection		The site is within the Green Belt.												
L(i)7	S / M	/	-	++	++	/	++	/	0	++	+	--	++	++
	L	/	-	++	++	/	++	/	0	++	+	/	++	++
Safeguarded site – Reason for safeguarding:		The granting of planning permission for this activity means that this site must now be considered to contribute towards the total waste capacity in the Plan Area. Allocation of the site to support this activity is therefore unnecessary.												
L(i)10R	S / M	+	-	++	++	+	/	++	0	+	+	--	++	++
	L	+	-	++	++	+	/	++	0	+	+	/	++	++
Allocated Site – Reason for allocation:		The site scored highly against other sites considered for allocation in the Waste Site Assessment Report. It is also considered suitable to meet the capacity gap requirements and conforms to the general principles of the Spatial Strategy and the proximity principle.												
L(i)17R	S / M	/	-	++	-	+	++	++	0	+	/	-	+	+
	L	/	-	++	-	+	++	++	0	+	/	-	+	+
Allocated Site – Reason for allocation		<i>Site L(i)17R Newport Quarry was put forward during the Revised Preferred Approach (2015) consultation. The site scored highly against other sites considered for allocation in the Waste Site Assessment Report and was identified as being able to meet inert landfill and recycling needs particularly in the west of the County. For these reasons the site has been allocated for both inert recycling and inert landfill.</i>												
L(n)1R	S / M	+	-	++	++	/	/	++	0	+	/	-	+	++
	L	+	-	++	++	/	/	++	0	+	/	/	+	++
Allocated Site – Reason for allocation:		The site scored highly against other sites considered for allocation in the Waste Site Assessment Report. It is also considered suitable to meet the capacity gap requirements and conforms to the general principles of the Spatial Strategy and the proximity principle.												
L(n)6R	S / M	-	-	--	++	+	--	/	0	++	+	-	++	++
	L	-	-	--	++	+	--	/	0	++	+	/	++	++
Reason for rejection		The site is within the Green Belt.												
L(n)7R	S / M	/	-	--	++	/	/	/	0	+	+	/	++	+
	L	/	-	--	++	/	/	/	0	+	+	/	++	+

<b>Reason for rejection:</b>		<p>The WPAs do not consider that this site would be capable of operating independently for this specific use with other sites at Crumps Farm / Little Bullocks Farm having been allocated. The site however has been allocated for another use.</p> <p><i>There is an amendment from the SA of the Revised Preferred Approach (2015) regarding an erroneous impact on the sustainable management of waste (SO9) at site L(n)7R – Little Bullocks Farm Site A22. This is due to the site being Greenfield land with no planning history within the specific red-line boundary of the site. As such, the significant positive impact highlighted at the Revised Preferred Approach (2015) stage SA has been amended to be a minor positive impact. In addition, the site was also previously erroneously judged to have significant positive impacts on flooding (SO3) for certain uses / facilities, however a small amount of the site is within FZ3. As such the site will now have significantly negative impacts on this objective. A re-assessment of the site now also indicates that there will moderate impacts on landscape which will give rise to an uncertain impact on SO6; an amendment of a significantly positive score highlighted in the SA at the Revised Preferred Approach (2015) stage.</i></p>													
L(n)8R	S / M	/	-	++	++	+	-	/	0	+	+	--	++	/	
	L	/	-	++	++	+	-	/	0	+	+	/	++	/	
<b>Reason for rejection:</b>		<p>The WPAs do not consider that this site would be capable of operating independently for this specific use with other sites at Crumps Farm / Little Bullocks Farm having been allocated. The site has however been allocated in the Plan for another use.</p> <p><i>There is an amendment from the SA of the Revised Preferred Approach (2015) regarding an erroneous impact on the sustainable management of waste (SO9) at site L(n)8R. This is due to the site being Greenfield land with no planning history within the specific red-line boundary of the site. As such, the significant positive impact highlighted at the Revised Preferred Approach (2015) stage SA has been amended to be a minor positive impact. A re-assessment of the site now also indicates that there will moderate to major effects on landscape which will give rise to an negative impact on SO6; an amendment of an uncertain score highlighted in the SA at the Revised Preferred Approach (2015) stage.</i></p>													
W1	S / M	+	-	++	++	+	/	/	0	++	--	/	--	++	
	L	+	-	++	++	+	/	/	0	++	--	/	--	++	
<b>Reason for rejection</b>		<p>The site is not considered to be suitable in Highway Terms and/or does not comply with Transport Policy.</p>													
W3	S / M	+	-	/	++	+	/	++	0	++	+	-	++	++	
	L	+	-	/	++	+	/	++	0	++	+	/	++	++	
<b>Reason for rejection:</b>		<p>The WPAs have decided to prioritise meeting the forecasted biological recovery capacity need over the recycling of inert waste. This approach will reduce the amount of biological waste going to landfill. Sending biological waste to landfill, rather than inert waste, is considered to have greater environmental impacts, given the potential for such waste to generate bio-aerosols and greenhouse gases. As a result, this site has not been allocated for inert recycling and has</p>													

		<p>been allocated in the Plan for biological treatment.</p> <p><i>An amendment to the impacts previously highlighted in the SA of the Revised Preferred Approach (2015) regarding health and well-being (SO11) on Site W3 (Basildon WWTW) has also been made. This is due to there being sensitive receptors within 250m of the site. As such the previously highlighted uncertain impacts are now judged to be negative. The site is also now recognised as being in FZ2 (previously erroneously judged to be in FZ1 for some uses) which sees an amendment to the impacts highlighted for flooding (SO3) as uncertain, where previously they were considered significantly positive.</i></p>													
W7	S / M	+	-	--	/	+	+	++	0	++	/	/	+	++	
	L	+	-	--	/	+	+	++	0	++	/	/	+	++	
<p><b>Allocated Site – Reason for allocation:</b></p>		<p>The site scored relatively highly against other sites considered for allocation in the Waste Site Assessment Report. It is also considered suitable to meet the capacity gap requirements and conforms to the general principles of the Spatial Strategy and the proximity principle.</p> <p><i>The WPAs have decided to prioritise meeting the forecasted biological recovery capacity need over the recycling of inert waste. This approach will reduce the amount of biological waste going to landfill. Sending biological waste to landfill, rather than inert waste, is considered to have greater environmental impacts, given the potential for such waste to generate bio-aerosols and greenhouse gases. As a result, this site was a preferred site for biological treatment at the Revised Preferred Approach (2015) stage. It scored highly against other sites considered for allocation in the Waste Site Assessment Report, was also considered suitable to meet the capacity gap requirements and conformed to the general principles of the Spatial Strategy and the proximity principle.</i></p> <p><i>Since the Revised Preferred Approach (2015) stage, it has been determined that the previous five preferred sites for biological treatment can deliver a total of 259,000tpa which is over and above the 217,000tpa needed. As the site W7 Sandon East scored significantly lower than the other four sites and those four sites on their own would provide sufficient capacity it has been discounted for biological waste treatment. The site has instead been allocated for inert recycling.</i></p>													
W8	S / M	+	++	++	/	-	-	/	0	+	+	-	++	/	
	L	+	++	++	/	-	-	/	0	+	+	/	++	/	
<p><b>Allocated Site – Reason for allocation:</b></p>		<p>The site scored highly against other sites considered for allocation in the Waste Site Assessment Report. It is also considered suitable to meet the capacity gap requirements and conforms to the general principles of the Spatial Strategy and the proximity principle.</p> <p><i>An amendment has been made since the SA of the Revised Preferred Approach (2015) regarding historic environment impacts at W8 - Elsenham. Uncertain impacts were previously highlighted for certain facility types due to moderate issues regarding the historic environment (SO5), however a re-assessment of the site has led to a major impact issue (which may be acceptable subject to mitigation) being highlighted for all facility types. As such impacts are now negative.</i></p>													



W13	S / M	/	-	++	++	++	++	/	0	++	/	--	+	++
	L	/	-	++	++	++	++	/	0	++	/	/	+	++
Reason for rejection:		Despite scoring highly, the site has been rejected due to extraction at the adjoining Wivenhoe Quarry having ceased and an inert recycling facility subsequently not being needed in this location.												
W14	S / M	/	-	++	++	++	++	/	0	++	--	-	--	++
	L	/	-	++	++	++	++	/	0	++	--	/	--	++
Reason for rejection		The site is not considered to be suitable in Highway Terms and/or does not comply with Transport Policy.												
W15	S / M	-	-	++	/	+	-	/	0	++	/	-	+	/
	L	-	-	++	/	+	-	/	0	++	/	/	+	/
Reason for rejection:		Not as sustainable, and did not score as highly as other sites considered for allocation in the Waste Site Assessment Report. In addition, there is an application for another incompatible use (housing) on the site which is pending.  <i>Since the Revised Preferred Approach (2015) stage, the impact highlighted in the SA for landscape (SO6) has needed amendment from significantly negative to minor negative. This is due to a re-assessment of the site.</i>												
W18	S / M	/	++	++	++	+	/	/	0	++	--	-	--	++
	L	/	++	++	++	+	/	/	0	++	--	/	--	++
Reason for rejection		The site is not considered to be suitable in Highway Terms and/or does not comply with Transport Policy.												
W19	S / M	+	++	++	-	++	--	++	0	+	+	-	++	++
	L	+	++	++	-	++	--	++	0	+	+	/	++	++
Reason for rejection		<i>At the Revised Preferred Approach (2015) stage the Council initially allocated this site, despite it failing the Stage 2 sieving criterion of being located within the Green Belt. Despite being located in the Green Belt, W19 was at that stage deemed to have fewer other negative impacts than the sites for inert recycling that passed Stage 2. At this Pre-Submission stage however, the decision to allocate has been reversed which is consistent with other sites that also failed at Stage 2 due to being located within the Green Belt.</i>												
W21	S / M	+	-	--	/	+	--	++	0	+	+	--	++	++
	L	+	-	--	/	+	--	++	0	+	+	/	++	++
Reason for rejection:		The site is within the Greenbelt.												
W24	S / M	+	-	++	-	++	/	++	0	++	--	/	--	-
	L	+	-	++	-	++	/	++	0	++	--	/	--	-
Reason for rejection		The site is not considered to be suitable in Highway Terms and/or does not comply with Transport Policy.												

W31	S / M	+	++	++	/	/	/	/	0	++	+	-	++	++
	L	+	++	++	/	/	/	/	0	++	+	/	++	++
Allocated Site – Reason for allocation:		<p>The site scored highly against other sites considered for allocation in the Waste Site Assessment Report in consideration also of its suitability to meet the capacity gap requirements and conforms to the general principles of the Spatial Strategy and the proximity principle.</p> <p><i>An amendment since the Revised Preferred Approach (2015) stage SA regards the previous positive impact stated for the sustainable management of waste (SO9). This has been amended to a significant positive impacts associated with its positive waste use / permission history.</i></p>												
W32	S / M	/	-	--	-	/	-	/	0	+	+	/	++	+
	L	/	-	--	-	/	-	/	0	+	+	/	++	+
Allocated Site – Reason for allocation:		<p><i>At the Revised Preferred Approach (2015) stage, this site was not selected. The site promoter put forward three proposals for inert recycling in this location: L(n)7R (55,000tpa), L(n)8R (30,000tpa) and W32 (80,000tpa) and previously L(n)7R was selected for inert recycling. The WPAs do not consider that three separate inert waste facilities at each of these three sites within the Little Bullocks / Crumps Farm operation would be capable of operating independently of each other and simultaneously from a practical standpoint. For this reason only one of the proposed sites has been included as a site allocation for inert waste recycling.</i></p> <p><i>W32 Crumps Farm has been selected because it provides for the most efficient use of the total waste site in conjunction with other existing and permitted operations. It has the largest potential capacity of the three proposals (80,000tpa), is located closer to the highway and would not displace any part of landfill operation on L(n)7R. L(n)8R is a less appropriate location for an inert recycling operation and has been selected for taking hazardous waste.</i></p> <p><i>W32 Crumps Farm will see an amendment from the Revised Preferred Approach (2015) SA. This responds to impacts regarding the sustainable management of waste (SO9) and an amendment from the significantly positive impact previously stated to a minor positive. This has been reassessed due to parts of the site not having relevant planning / history.</i></p>												
W35	S / M	/	-	++	-	/	/	/	0	++	--	-	--	+
	L	/	-	++	-	/	/	/	0	++	--	/	--	+
Reason for rejection		<p>The site is not considered to be suitable in Highway Terms and/or does not comply with Transport Policy.</p>												
W36	S / M	/	++	++	-	+	/	++	0	+	/	-	+	++
	L	/	++	++	-	+	/	++	0	+	/	/	+	++
Allocated Site – Reason for allocation:		<p>The site scores highly against other sites considered for allocation in the Waste Site Assessment Report in consideration also of its suitability to meet the capacity gap requirements and conform to the general principles of the Spatial Strategy and the proximity principle. The site is allocated post-Examination in response to site W13 Wivenhoe Quarry not being required due to the cessation of mineral</p>												

		<p>extraction at the adjoining Wivenhoe Quarry.</p> <p>The site adjoining W36 is allocated within the adopted Minerals Local Plan (2014) for minerals extraction and thus the previously preferred inert recycling facility of W13 has been relocated to this site where such a facility is required. It should be noted that both the Wivenhoe (W13) and Sunnymead (W36) sites have the same operator.</p>												
SIE5	S / M	+	++	++	++	++	+	/	0	++	--	++	++	++
	L	+	++	++	++	++	+	/	0	++	--	/	++	++
Reason for rejection:		<p>Since the Revised Preferred Approach (2015) stage, the site has been considered to not be suitable in Highway Terms and/or does not comply with Transport Policy. This is due to Grange Road being of an insufficient width to allow two HGVs to pass satisfactorily.</p>												

**Element of the SA – Conclusions: The Strategic Site Allocations (Policy 3)**

The following table shows the sustainability impacts of the strategic site allocations of the Plan.

Sites for: BIOLOGICAL WASTE MANAGEMENT														
Site Ref.	Temp Effect	Sustainability Objectives (SO)												
		1	2	3	4	5	6	7	8	9	10	11	12	13
W29 Bellhouse	S / M	/	-	++	++	/	-	/	/	+	+	--	++	++
	L	/	-	++	++	/	-	/	/	+	+	/	++	++
W3 Basildon WWTW	S / M	/	-	/	/	+	/	++	0	++	+	-	++	++
	L	/	-	/	/	+	/	++	0	++	+	/	++	++
W20 Courtauld Road	S / M	/	-	++	/	++	/	++	0	++	+	-	+	++
	L	/	-	++	/	++	/	++	0	++	+	/	+	++
IWMF2 - Rivenhall	S / M	+	-	++	-	++	-	++	++	++	+	--	++	++
	L	+	-	++	-	++	-	++	++	++	+	/	++	++
Sites for: INERT WASTE RECYCLING														
Site Ref.	Temp Effect	Sustainability Objectives (SO)												
		1	2	3	4	5	6	7	8	9	10	11	12	13
W32 Crumps Farm	S / M	/	-	--	-	/	-	/	0	+	+	/	++	+
	L	/	-	--	-	/	-	/	0	+	+	/	++	+
W8 Elsenham	S / M	+	++	++	/	-	-	/	0	+	+	-	++	/
	L	+	++	++	/	-	-	/	0	+	+	/	++	/
W7 Sandon East	S / M	+	-	--	/	+	+	++	0	++	/	-	+	++
	L	+	-	--	/	+	+	++	0	++	/	/	+	++

L(n)1R Slough Farm	S / M	+	-	++	++	/	/	++	0	+	/	-	+	++
	L	+	-	++	++	/	/	++	0	+	/	/	+	++
L(i)10R Blackley (Site 1)	S / M	+	-	++	++	+	/	++	0	+	+	--	++	++
	L	+	-	++	++	+	/	++	0	+	+	/	++	++
W36 Sunny-mead (s2)	S / M	/	++	++	-	+	/	++	0	+	/	-	+	++
	L	/	++	++	-	+	/	++	0	+	/	/	+	++
W31 Morses Lane	S / M	+	++	++	/	/	/	/	0	++	+	-	++	++
	L	+	++	++	/	/	/	/	0	++	+	/	++	++
L(i)17R Newport Quarry	S / M	/	-	++	-	+	++	++	0	+	/	-	+	+
	L	/	-	++	-	+	++	++	0	+	/	/	+	+
<b>Site for: OTHER WASTE MANAGEMENT</b>														
Site Ref.	Temp Effect	Sustainability Objectives (SO)												
		1	2	3	4	5	6	7	8	9	10	11	12	13
IWMF2 Rivenhall	S / M	+	-	++	-	++	/	++	++	++	+	--	++	/
	L	+	-	++	-	++	/	++	++	++	+	/	++	/
<b>Sites for: INERT LANDFILL</b>														
Site Ref.	Temp Effect	Sustainability Objectives (SO)												
		1	2	3	4	5	6	7	8	9	10	11	12	13
L(n)7R Little Bullocks A22	S / M	/	--	--	++	/	/	/	0	+	+	--	++	+
	L	/	--	--	/	0	/	0	0	0	0	/	0	0
L(n)1R Slough Farm	S / M	+	--	++	++	/	/	++	0	+	/	--	+	++
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
L(i)10 Blackley (Site 1)	S / M	+	--	++	++	+	/	++	0	+	+	--	++	++
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
L(i)6 Sandon	S / M	-	--	--	++	+	/	++	0	++	/	--	++	++
	L	/	--	--	/	0	/	0	0	0	0	/	0	0
L(i)5 Sunnymead	S / M	/	--	++	++	/	++	/	0	+	/	--	+	++
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
L(i)17R Newport Quarry	S / M	/	--	++	-	+	++	++	0	+	/	--	+	+
	L	/	--	++	/	0	/	0	0	0	0	/	0	0

L(n)5 Bellhouse	S / M	/	--	++	++	+	+	/	0	++	+	--	++	++
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
L(i)15 Fingringhoe	S / M	/	--	++	/	+	++	++	0	++	++	--	++	++
	L	/	--	++	/	0	/	0	0	0	0	/	0	0
L(i)16	S / M	+	--	--	/	+	--	++	0	+	+	--	++	++
	L	/	--	--	/	0	++	0	0	0	0	/	0	0
<b>Sites for: (STABLE NON-REACTIVE) HAZARDOUS WASTE LANDFILL</b>														
Site Ref.	Temp Effect	Sustainability Objectives (SO)												
		1	2	3	4	5	6	7	8	9	10	11	12	13
L(n)8R Little Bullocks	S / M	/	--	++	++	+	-	/	0	+	+	--	++	/
	L	/	--	++	/	0	/	0	0	0	0	/	0	0

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## **CABINET**

Tuesday, 19<sup>th</sup> September 2017

### **COUNCIL PROCEDURE RULE 46**

The following action taken in accordance with Council Procedure Rule 46 is reported. In consultation with the appropriate Executive Councillor(s):-

#### **1. The Director for Planning & Transport authorised:**

1.1 Request to Implement an Experimental Traffic Regulation order in Lifstan Way near to the Railway Bridge

Following the removal of the coach parking areas in Seaway Car Park, the introduction of an Experimental Traffic Regulation Order to prohibit parking by coaches for part of the day each day of the week.

1.2 Utilise the Gas Works for a Temporary Car Park

Approval to undertake the statutory consultation for the introduction of a Traffic Regulation Order to enable the use of the site as a temporary car park on a trial basis.

#### **2. The Deputy Chief Executive (Place) authorised:**

2.1 Request to Implement an Experimental Traffic Regulation order in Lifstan Way near to the Railway Bridge and other potential locations

Further to 1.1 above, the inclusion of goods vehicles over a chosen weight (usually a minimum of 5 tonnes), in addition to coaches/buses, to the parking restrictions to be imposed by the Experimental Traffic Regulation Order. The restrictions will also be introduced in Ness Road, Shoeburyness and other locations as and when identified.

2.2 Parking Permits

Subject to the overall changes meaning that the yield of the total parking income budget is unaffected, the issuing of parking permits for the following organisations:

- Kite Surfers to be able to purchase a permit at a cost of £100 in the same manner as beach hut owners – Zone 3A
- Fishermen at Old Leigh – Zone 3A
- Conversion of the loading bay at Pier Arches to enable existing permit holder traders to purchase a permit at a price

of £400 p.a. to assist businesses in parking/loading/unloading.  
Note: currently there are two permits

- RNLI to be able to receive free permits (3 No.) and St. John's Ambulance two free permits (2no.) to park along the seafront
- The Methodist Church in New Road (6No.) to park in Belton Gardens North Car Park
- Leigh Town Councillors to park in Elm Road Car Park
- The Mosque to be able to receive discounted vouchers for Colchester Road at 50% of the normal price
- The Samaritans to continue with two existing permits (2 No.) for Queensway East Scheme as well as parking vouchers

2.3 Energy Company Obligation: Help to Heat, Local Authority Flexible Eligibility Statement of Intent

The launch of the Local Energy Advice Programme (LEAP) funded by the Energy Company Obligation (ECO) (approved by Ofgem), with the administration of the statement of intent to be managed by the LEAP Service.

2.4 A127 Kent Elms Junction Improvement – National Productivity Investment Fund Allocation (NPIF)

The utilisation of the NPIF to support the scheme which will extend the total capital available to meet the estimated final turn out cost of the scheme including the new footbridge.

**3. The Director for Adult Services and Housing authorised:**

3.1 New Agreement with Northumbrian Water Ltd (t/a Essex & Suffolk Water)

The entering into a modified form of agreement with Northumbrian Water Ltd to re-inforce the fact the Council is acting as an agent for the water company and not a re-seller, in collecting water charges from Council Tenants in properties without water meters.

**4. The Deputy Chief Executive (People) authorised:**

4.1 Pension Guarantee Agreement re Southend Care Ltd.

Further to Minute 564(8) of the meeting of Cabinet held on 19 January 2016, the completion of the Pension Guarantee Agreement with Essex County Council, with Southend Borough Council under-writing the pension liabilities of Southend Care Ltd and indemnifying Essex County Council against any losses to the Pension Fund.



**5. The Director of Finance and Resources authorised:**

5.1 Southend Integrated Equipment Service – Lease Renewal, The Forum, Unit 8 Coopers Way

The proposed lease renewal at Unit 8 Coopers Way, where SBC is the Head lessee and Essex Partnership University NHS Foundation Trust being the Sub Tenant providing occupational therapy and wheelchair assessment service within the premises.

**6. The Director for Legal and Democratic Services authorised:**

6.1 Notice of Intention to Cease Membership of the Local Government Association (LGA)

The giving of Notice to the LGA of the Council's intention to cease its membership on 31 March 2018.

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**SOUTHEND-ON-SEA BOROUGH COUNCIL**

**Meeting of Grants Strategy Working Party**

**Date: Tuesday, 5th September, 2017**  
**Place: Committee Room 2 - Civic Suite**

**Present:** Councillor A Moring (Chair)  
Councillors D Burzotta, C Endersby, N Folkard\*, R Hadley and  
D McGlone  
\*Substitute in accordance with Council Procedure Rule 31.

**In Attendance:** L Eddy, T Row, K Clarke and G Taylor

**Start/End Time:** 6.30 p.m. - 6.55 p.m.

**1 Apologies for Absence**

Apologies for absence were received from Councillor Habermel (Substitute: Councillor Folkard).

**2 Declarations of Interest**

The following interests were declared at the meeting:

(a) Councillor Burzotta – Agenda Item No. 4 (Community Commissioning Prospectus 2018-21) – Non-pecuniary interest: Has raised money for HARP;

(b) Councillor Moring – Agenda Item No. 4 (Community Commissioning Prospectus 2018-21) – Non-pecuniary interest: Council appointed member of SAVS Board.

**3 Minutes of the Meeting held on Wednesday, 17th December, 2014**

Resolved:-

That the Minutes of the Meeting held on Wednesday, 17<sup>th</sup> December 2017 be received and confirmed as a correct record.

**4 Community Commissioning Prospectus 2018-21**

The Working Party received a report of the Chief Executive that informed Members and sought the Working Party's approval of the Community Commissioning Prospectus 2018-21. A copy of the proposed prospectus was attached to the report at Appendix 1.

It was emphasised that the draft prospectus would remain confidential until 4<sup>th</sup> October 2017 when it would be published at the commencement of the application process, subject to Cabinet approval.

Resolved:

That the criteria used to draft the Community Commissioning Prospectus 2018-21 as set out in paragraph 3.7 of the report be noted.

Recommended:

That the proposals put forward for a Community Commissioning Prospectus 2018-21 as set out in Appendix 1 be recommended to Cabinet for approval.

**Chairman:** \_\_\_\_\_