

**Replacement Waste Local Plan – Revised Preferred Approach Consultation Questions
Response from North Weald Bassett Parish Council**

ISSUE	QUESTION	ANSWER / COMMENT
Vision	Do you agree with the Proposed Vision	<p>Partly. The Waste Hierarchy and principle of net self-sufficiency is understood, however it is incorrect that the vision states that '<i>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</i>'. Whilst in some aspect of waste the plan will provide sufficient waste management infrastructure, in other areas it will only provide a '<u>preferred location</u>'. A preferred location is NOT 'sufficient waste management infrastructure' - it is simply a preferred location.</p> <p>The vision states that '<i>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 risks of cumulative impacts</i>'. This should be qualified further - as it currently stands this would suggest that a CD&E waste site could be located next to housing, which is completely inappropriate.</p> <p>The vision states '<i>Waste management within the Plan area will be undertaken in ways that minimises contributing to potential climate change, primarily through minimisations in waste transportation and landfilling</i>'. It is incorrect for this statement to be included in the vision, as ECC (from the point of adoption of the RWLP), has no further involvement in terms of the traffic movements to and from waste facilities, and both their origin and destination. Therefore, how do ECC propose to manage and implement this part of the vision.</p>
Strategic Objectives	Do you agree with the 'Proposed Strategic Objectives'?	<p>Whilst the general Strategic Objective of minimizing waste going to landfill by way of the Waste Hierarchy is accepted and supported, there is again concern regarding how elements of the Objectives are able to be achieved based on the notion that ECC has no powers of control or enforcement of traffic movement after adoption of the plan. For example, SO6 states '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 by locating new waste facilities in proximity to key growth centres'. How can this possibly be effectively managed? This applies also to SO8 which states 'To ensure waste facilities, and their proposed locations, are sustainably designed, constructed and well operated to reduce potential adverse effects on human health, amenity and the environment, in line with national standards and regulations.' How can this be an objective when ECC has no control over the management of sites?</p> <p>SO7 states '<i>To maximise opportunities for sustainable economic growth through the co-location of waste facilities within non-waste development and by encouraging the use of waste as a resource, including assessing its potential as a source of heat and energy</i>'. This should be qualified further - as it currently stands this would suggest that a CD&E waste site could be located next to housing, which is utterly inappropriate.</p>

Overall Spatial Strategy	Do you agree with the 'Overall Spatial Strategy' and Picture 7?	<p>The Overall Spatial Strategy states '<u>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 is managed and treated close to its source.</u>'. Once again, if ECC has no further control over certain sites (specifically in this context site W19), how can ECC, or the plan itself, ensure that the majority of waste arising is managed and treated close to its source? It is incorrect to put such a statement in the strategy, if it is unable to be appropriately managed.</p> <p>The Strategy states that '<u>Opportunities to co-locate facilities on existing waste management sites will be supported where appropriate</u>'. Whilst this makes certain sense, this has not been applied consistently, specifically regarding site W19 which has been incorrectly identified as '<i>The site is adjacent to a highway depot and the M11 motorway. Much of the site is already being used for a similar activity</i>'. The word 'adjacent' is not the same as an 'existing site', especially as the site is located wholly within the Green Belt and any activity on the site is being completed WITHOUT planning permission.</p> <p>The Overall Spatial Strategy also states '<i>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</i>'. The Parish Council fully supports the notion of being 'sympathetic to the infrastructure constraints', however fails to see how this has been applied by way of the site allocations, being as Junction 7 of the M11 is over capacity. Furthermore, the argument of capacity referencing the proposal for Junction 7a of the M11 easing pressure does not have any weight, as the Junction 7a proposal and evidence states that Junction 7 will remain 'overcapacity' despite the introduction of Junction 7a. As is evident, this part of the strategy has not been implemented via the site allocations, the analogy being having a cup full of water, yet leaving the tap running!</p>
Need for Waste Management Facilities	Do you agree with the need to meet the future needs of the Plan area through allocations as set out in this Preferred Approach 1 – dealing with the need for waste management facilities? Please make reference to evidence base documents as part of your answer.	<p>No. The Parish Council disagrees.</p> <p>Section 2.3.8 Transport of the Sustainability Appraisal states '<i>There are persistent network efficiency issues especially on a number of strategic inter-urban routes which are operating at or near to capacity. The Government-managed A12 and M25 and M11 have widely recognised issues with poor reliability and delays</i>'. The remaining other evidence base documents fail to set out any acceptable mitigation measures which would alleviate capacity issues on these roads (which would be further exacerbated by the introduction of a SARS) and consequently the Parish Council fails to understand how the allocation of Site W19 would be an acceptable proposal.</p> <p>Paragraph 5 of the National Planning Policy for Waste states that '<i>Waste planning authorities should assess the suitability of sites and/or areas for new or enhanced waste management facilities against the capacity of existing and potential transport infrastructure to support the sustainable movement of waste</i>'. Whilst this is referenced in the Site Assessment and Methodology report (table 4, 2b, page 18), this seems to have inadequately been applied to the actual site assessments, with site W19 scoring 'green',</p>

		<p>when quite clearly there are serious, nationally recognised concerns regarding the capacity of Junction 7 of the M11 to deal with such a large increase in heavy vehicle movement.</p> <p>It is for these reasons that the Parish Council disagrees with the site allocations set out in the Preferred Approach, suggesting it is incorrect and flawed.</p> <p>The Summary Waste Capacity Gap Report (2015) is not listed on the ECC Website as being a evidence base document supporting the Revised Preferred Approach, despite being listed in the Revised Preferred Approach document. As such, the Parish Council is unable to review or reference this document as part of this answer.</p>
Waste Consultation Zones	Do you agree with Preferred Approach 2 – dealing with safeguarding and waste consultation zones? Please explain your answer.	The protection of waste consultation zones is understood, and their principal accepted.
Strategic Site Allocations: Local Authority Collected Waste (LACW)	Many of the LACW facilities have planning permission and / or are currently operating. The preferred approach to allocate these sites reflects the future potential for the intensification / expansion of waste uses in these locations. Do you agree with Preferred Approach 3? Please explain your answer.	The Parish Council has no comment regarding this question.
Strategic Site Allocations: Biological Treatment	Do you agree with the Preferred Approach? Please explain your answer.	The Parish Council has no comment regarding this question.
Strategic Site Allocations: Inert Waste Recycling	8.Do you agree with the Preferred Approach? Please explain your answer.	<p>For the reasons set out in earlier responses to questions, the Parish Council disagrees with the Strategic Allocations as set out in the preferred approach. In addition, the Site Assessment for W19 is incorrect for the following reasons:</p> <ul style="list-style-type: none"> • The site IS within 250m of a listed building (Rundells, located approx 103m away). • The site has been incorrectly and inappropriately assessed and scored with regard to infrastructure capacity, as detailed earlier in this response. • The assessment states that there is 'no relevant planning history'. However, upon investigation it seems that a section of the site is currently being used unlawfully and without planning permission, the temporary permission having lapsed in 2008. This is extremely concerning as ECC has stated that the site has planning permission, and that the District Council are aware. The Parish council challenges this statement. • 2b Traffic and Transportation states '<i>Existing access arrangement are satisfactory but subject to further consideration at planning application stage</i>'. In light of the comments earlier regarding the capacity issues of Junction 7a, the statement that existing access arrangements

		<p>are satisfactory is open to debate.</p> <ul style="list-style-type: none"> • Section 3b states '<i>The site is adjacent to a highway depot and the M11 motorway. Much of the site is already being used for a similar activity</i>'. Whilst it is true that the site is adjacent to a current Highways depot, the unauthorised works taking place on this area of Green Belt are NOT being used for a similar activity. • Section 3c states '<i>More than 50% of the site is previously developed land. The proposals for the site include an extension in to a green field to the south of the existing site</i>'. The Parish Council challenges the statement that more than 50% of the site is previously developed land. In addition, the current use of this land is unauthorised and unapproved, with a condition of the lapsed planning permission stating that the site should be returned to Greenfield. This has not been implemented by EFDC, and the site continues to be used with the knowledge of ECC. • 3H states '<i>Slight significance for (insignificant deleted) landscape and visual effects. The site is distant from properties and screened on one side by conifers and adjacent to a highway depot</i>'. It is concerning that the words 'insignificant deleted' seems to suggest that the initial opinion of the assessor was that there was no significant effect! Perhaps this section of wording should have been removed. In addition, has a conversation taken place with the neighbouring properties to ascertain how significant they feel such a site would affect the landscape and visual effect, or is this simply the view of an assessor? • 3J states that '<i>There are no heritage assets within close proximity to the site that would be compromised by the site proposals</i>'. Surely the presence of a listed property should be included in this assessment and reviewed accordingly? • The site is also close to a local Hospice a Restaurant and a Garden Centre and is therefore deemed in an inappropriate location. • It is understood there is no Mains drainage on the site.
Opportunity Site Allocations: Additional Built Waste Management Facilities	Do you agree with the Preferred Approach? Please explain your answer.	The Parish Council has no comment regarding this question..
Strategic Site Allocations: Inert Landfill	Do you agree with the Preferred Approach? Please explain your answer.	The Parish Council has no comment regarding this question.
Strategic Site Allocations: Non-Hazardous Landfill	Do you agree with the Preferred Approach? Please explain your answer.	The Parish Council has no comment regarding this question.

Strategic Site Allocations: Stable Non-Reactive Hazardous Waste Landfill	Do you agree with the Preferred Approach? Please explain your answer.	The Parish Council has no comment regarding this question.
Land raising	Do you agree with the Preferred Approach? Please explain your answer.	The Parish Council has no comment regarding this question.
Areas of Search	Do you agree with identifying Areas of Search as a means of increasing flexibility with the Plan? Please explain your answer.	Whilst the principal of 'Areas of Search' is accepted, it seems in many instances that the Areas of Search identified seem more appropriate for certain Recycling centres, many being previously developed land, or recognised Industrial Areas. The Parish Council feels that these sites should have been given a higher priority in terms of suitable locations for recycling facilities, thereby alleviating the need to have centres on Greenfield sites within the Green Belt.
Locational Criteria for Enclosed Waste Facilities	Do you agree with the locational criteria as set out in Preferred Approach 12? Please explain your answer.	The justification detailed in the Revised Preferred Approach regarding locational criteria states that ' <i>Due to their nature, aggregate recycling facilities are best located on mineral extraction sites</i> '. The documents fail to show whether or not any priority has been given to the placing of SARS at mineral extraction sites.
Locational Criteria for Open Facilities	Do you agree with the locational criteria as set out in Preferred Approach 13? Please explain your answer.	The justification detailed in the Revised Preferred Approach regarding locational criteria states that ' <i>Due to their nature, aggregate recycling facilities are best located on mineral extraction sites</i> '. The documents fail to show whether or not any priority has been given to the placing of SARS at mineral extraction sites. In addition, an open air recycling facility seems illogical if the operations create deposits in the open air which would be detrimental to neighbouring properties.
Locational Criteria for intermediate, low and very low Radioactive Waste Facilities	Do you agree with the locational criteria as set out in Preferred Approach 14? Please explain your answer.	The Parish Council has no comment regarding this question..
Landfill	18. Do you agree with the locational criteria as set out in Preferred Approach 15? Please explain your answer.	The Parish Council has no comment regarding this question.
Mitigating and adapting to Climate	Do you agree with Preferred Approach 16? Please explain your answer.	The Parish Council has no comment regarding this question.

Change		
Transportation of Waste	Do you agree with Preferred Approach 17? Please explain your answer.	The Justification states that ' <i>It is therefore recognised that the majority of waste transport will be by road. A hierarchical approach is proposed to mitigate potential adverse effects by directing HGV traffic onto appropriate main roads / routes so as to create as little an impact on transportation infrastructure as possible. This will also protect the safety and efficiency of the highway network and minimise situations where lorries will directly impact on local residential amenity</i> '. Site W19 will direct traffic straight onto the M11 Junction 7 roundabout, which as stated earlier is (and will remain) overcapacity. It therefore seems completely at odds to allocate a site using this justification.
General considerations for all Waste Management Development Proposals	Do you agree with Preferred Approach 18? Please explain your answer.	The Parish Council has no comment regarding this question.
Mining of Waste	Do you agree with Preferred Approach 19? Please explain your answer.	The Parish Council has no comment regarding this question...
Monitoring Indicators	23.(1) Do you agree with the proposed monitoring and implementation framework for the RWLP? 23.(2) Are there any other indicators that should be included? Please explain your answer.	The Parish Council has answered this question within the earlier responses.