



# Essex County Council & Southend-on-Sea Borough Council – Replacement Waste Local Plan

## **Sustainability Appraisal (SA): Post-Adoption Statement - June 2017**



**Client:**  
Essex County Council &  
Southend-on-Sea Borough Council

**Sustainability Appraisal:**  
Post-Adoption Statement





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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
EHERR	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
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

## 1.1 Background

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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.

Place Services are acting as consultants for this work; therefore the content of this SA should not be interpreted or otherwise represented as the formal view of Essex County Council.

## 1.2 Requirement for a Post-Adoption Statement

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Once a plan or programme has been adopted, the Strategic Environmental Assessment (SEA) Directive requires those responsible for preparation, to provide the public and the Consultation Bodies with information on how environmental considerations and consultation responses are reflected in the plan or programme, the reason for choosing the plan or programme as adopted in light of reasonable alternatives and how its implementation will be monitored in the future.

The Environmental Assessment of Plans and Programmes Regulations 2004 states that as soon as reasonably practicable after the adoption of a plan or programme for which an environmental assessment has been carried out under these Regulations, the responsible authority shall demonstrate the following:

- (a) how environmental considerations have been integrated into the plan or programme;*
- (b) how the environmental report has been taken into account;*
- (c) how opinions expressed in response to -
  - (i) the invitation referred to in regulation 13(2)(d);*
  - (ii) action taken by the responsible authority in accordance with regulation 13(4),*  
*have been taken into account;**
- (d) how the results of any consultations entered into under regulation 14(4) have been taken into account;*
- (e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and*
- (f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.*

The aim and structure of this report is to address these requirements related to the adoption of the Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan 2017.



## 2. How Environmental Considerations have been taken into account...

### 2.1 Environmental Considerations

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The final SA Environmental Report sets out the sustainability baseline and context (Annexes B and A), identifies the sustainability issues affecting the Plan Area (Environmental Report) and explains the development of the SA frameworks for the appraisal of both policy content and sites (Annex C). It explains the different components of the Replacement Waste Local Plan including the strategic objectives, spatial strategy and sites. It includes thorough explanations of the appraisal methodology and appraisal findings and it gives conclusions and recommendations for monitoring.

The sustainability issues for the plan area were identified using the review of the relevant plans and programmes together with the analysis of baseline information for the district. These issues were used to develop Sustainability Objectives which were used to appraise the objectives, policies and site allocations identified through the plan preparation process. Baseline information provided a basis for taking an objective view on the likely impact of policies on each SA Objective. Since the baseline also provided comparative data for conditions in other areas and information about trends, a judgement could also be made concerning the significance of such an impact.

The specific environmental considerations of site options were explored in depth, using a robust 'site pro-forma' or site assessment framework. Recognising that different types of waste management and waste management facilities have different environmental considerations, the site pro-forma was developed to explore assess the environmental impacts of open air facilities, enclosed facilities and enclosed-thermal facilities.

With regard to the Replacement Waste Local Plan, four separate iterations of the Plan were published for consultation throughout the plan-making process. In 2010, a WDD Issues and Options Plan was consulted upon, followed by a WDD Preferred Approach in 2011. Due to changes in national requirements, and the emergence of the NPPF, a revised RWLP SA Scoping Report was published in 2015, followed by a RWLP Revised Preferred Approach which was also consulted upon in 2015. This was followed by a RWLP Pre-Submission document in 2016. Examination followed in September 2016, with a Main Modifications RWLP consultation in November 2016.

All of the above iterations of the Plan were accompanied by a SA and the SA process has been an integral part of the Plan's production.

Previous documents produced as part of the SA process are:

- SA Scoping Report, 2010
- WDD Issues and Options SA, 2010
- WDD Preferred Approach SA, 2011
- RWLP SA Scoping Report, 2015
- RWLP Revised Preferred Approach SA, 2015
- RWLP Pre-Submission SA, 2016
- RWLP Main Modifications SA, 2016





## 3. How the SA Environmental Report has been taken into account...

### 3.1 The History of the SA Process

As identified in the above section, an SA has accompanied the Plan at each consultation stage. As a result, and in line with the requirements of both SA and SEA, a number of recommendations were put forward to ECC and SBC as the plan-makers as to how the Plan could mitigate environmental concerns and maximise sustainability benefits. These are outlined below for each stage, with commentary as to whether (and how) the Plan has factored in each recommendation, or not.

**Table 1: How the SA Environmental Report has been taken into account**

Document	Chapter / Policy	SA Recommendation	How taken into account
WDD Issues and Options, 2010	Issue 12: Mitigating and Adapting to Climate Change	It is recommended that a definition is given as to what is meant by sustainable design.	The WDD Preferred Approach 2011 Plan included Preferred Approach 21: Mitigating and Adapting to Climate Change, which elaborated what was meant by sustainable design.
	Issue 13: Highways and Transportation	Issue 13 will need to consider the issue of current traffic congestion spots with regards to new waste sites as the document is progressed. It is recommended that proposed policy criteria includes seeking to mitigate potential negative impacts on Air Quality Management Areas (AQMAs) and Potentially Significant Junctions for air quality that may arise from the transportation of waste. Where this is not included in this document it may be more relevant as criteria when looking at detailed strategic and non-strategic sites elsewhere in the WDD.	Included as a factor in the assessment of sites (see Site Assessment Methodology – party of the Plan's evidence base).
WDD Preferred Approach, 2011	Preferred Approach 23: General Considerations for all Waste Management	It is recommended that the potential impacts on AQMAs and Potentially Significant Junctions (for air quality) are directly listed as a consideration when determining waste management development proposals.	Included as a factor in the assessment of sites (see Site Assessment Methodology – party of the Plan's evidence base).



Document	Chapter / Policy	SA Recommendation	How taken into account
	Development Proposals		
RWLP Revised Preferred Approach SA, 2015	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	This recommendation was not taken into account, and was also made at the RWLP Pre-Submission stage, with a satisfactory outcome (see below).
	Preferred Approach 18: General Considerations for All Waste Management Facilities	It is recommended that Preferred Approach 18 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 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.
	Strategic Site Allocations	<p>Cumulative Impacts of sites L(n)8R, L(n)7R, W9 and W8:</p> <p>Both sites L(n)7R and L(n)8R lie adjacent to the same small brook and left unmitigated the cumulative negative impact resulting from both allocations is likely to be magnified. It is recommended therefore that the mitigation measures for both sites take into account this cumulative effect. The impacts on biodiversity, both sites being in close proximity to a LoWS, are similar in that their individual impacts could magnify cumulatively. The same stance on mitigation would apply as that for water quality objectives.</p>	Sites W9 and W8 were not taken further through the process. 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



Document	Chapter / Policy	SA Recommendation	How taken into account
			<p>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.</p>
	Strategic Site Allocations	<p>Cumulative Impacts of sites L(i)10R, W34 and IWMF2:</p> <p>The potential for a cumulative negative impact on localised landscape quality (SO6) may exist with a range of singularly moderate to high impacts that could magnify. It is recommended that individual mitigation measures reflect this cumulative impact if there is proven to be a cumulative impact by landscape specialists.</p>	<p>IWMF2 had received planning permission at the next stage of Local Plan consultation in 2016.</p>
	Strategic Site Allocations	<p>Cumulative Impacts of sites L(n)1R, L(i)5, W13 and W31:</p> <p>Both site L(i)5 and W13 lie adjacent to the same water body to the west and east respectively and left unmitigated the cumulative negative impact on water quality (SO2) resulting from both allocations is likely to be magnified. It is recommended therefore that the mitigation measures for both sites take into account this cumulative effect. Cumulative effects may also occur surrounding each site's impact on biodiversity (SO1) in recognition of the Colne Estuary SPA in relative close proximity and in conjunction with the findings of the HRA.</p>	<p>Sites L(n)1R and W31 were not progressed.</p> <p>The general theme of water quality was given additional weight in Policy 10 of the Plan and expanded on within the Plan's Main Modifications, November 2016.</p> <p>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</p>



Document	Chapter / Policy	SA Recommendation	How taken into account
			<p>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.</p>
	Strategic Site Allocations	<p>Significant negative impacts have been highlighted for health and well-being (SO11) associated with the loss of a PROW and proximity to properties at the W29 Bellhouse site, which will need mitigation where possible through any forthcoming site related policy post-consultation. This is also the case for the W13 site at Wivenhoe Quarry.</p>	<p>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.</p>



Document	Chapter / Policy	SA Recommendation	How taken into account
	Strategic Site Allocations	There will be significant negative impacts associated with flooding (SO3) resulting from those sites L(n)7R at Little Bullocks Farm and W7 at Sandon. These are due to portions of the sites being in Flood Zone 3 and effective mitigation will be required.	This issue has been sufficiently covered by the Plan's policies at the Pre-Submission Plan stage.
	Strategic Site Allocations	The site L(i)10R may have a negative impact on well-being (SO11) resulting from its location to nearby properties which is likely to require mitigation.	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.
	Strategic Site Allocations	The concentration of sites within the District of Uttlesford could be perceived to give rise to negative cumulative effects on landscape (SO6) resulting from the allocation of sites L(n)7R and W8. These impacts are unlikely to be significant however, and can be addressed through mitigation on a site-by-site basis.	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.
	Strategic Site Allocations	There will be significant negative impacts on flooding (SO3) associated with IWMF2 being located in Flood Zone 3 and this will require mitigation measures to reduce the risk on and off site as a result.	IWMF2 had received planning permission at the next stage of Local Plan consultation in 2016.
	Strategic Site Allocations	A negative impact on well-being (SO11) will also exist for IWMF2 due to the proximity of nearby properties, which will require mitigation.	IWMF2 had received planning permission at the next stage of Local Plan consultation in 2016.
	Strategic Site	Site L(i)6 at Sandon has been predicted to have	At the Pre-Submission stage, it



Document	Chapter / Policy	SA Recommendation	How taken into account
	Allocations	significant negative impacts on flooding (SO3) due to a proportion of the site being within flood zone 3. The Site Assessment Report states that the site would be unsuitable for landfill if the Sequential and Exception Tests cannot be met and significant flood protection/mitigation measures employed and this recommendation is extended within this report.	was acknowledged that this proportion is very small however 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 use.
	Strategic Site Allocations	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. This impact on sensitive receptors should be mitigated within any forthcoming site policy.	At the Pre-Submission stage it is considered that the development principles formulated for this site as stated in Appendix B of the Plan adequately address this recommendation.
RWLP Pre-Submission, 2016	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.	These issues are sufficiently covered in other Plan Policies and also through the site assessment methodology used to select appropriate sites.



## 4. How the Results of Consultations have been taken into Account...

### 4.1 SA Consultations

The SA/SEA regulations require that the authorities referred to in Article 6 (3) shall be consulted when deciding upon the scope and level of detail of information that is to be included in the final Environmental Report. These authorities are referred to as the statutory consultees and include the Environment Agency, Historic England and Natural England.

Formal consultation on the SA has been undertaken alongside each stage of consultation on the Replacement Waste Local Plan / Waste Development Document and following these, responses were analysed where they specifically related to aspects of the SA. Where relevant and deemed necessary, these were taken into account at the next stage of SA work. The following table chronicles those consultation responses that subsequently influenced the SA.

**Table 2: How the results of Consultations have been taken into account**

Consultee	Comment	Action
<b>SA Scoping Report, 2010</b>		
Natural England	1.) No additional relevant plans and programmes identified. It is recognised that no list can be truly exhaustive, but the majority of key documents have been properly captured at national, regional, county and local levels.	Noted.
	2.) Natural England agrees that the sustainability objectives are sufficient and appropriate in their scope to capture the key issues associated with future Waste Development Plan Documents and enable a fair and robust assessment of emerging policies as part of the SA/SEA process.	Noted.
	3.) Under Sustainability Objective 1, Natural England is pleased to note the realistic and readily reportable indicator: "Condition of SSSIs". However other indicators may prove more challenging to report against (e.g. Changes in woodland and farmland bird species).	Noted.
Environment Agency	1.) The Environment Agency would like to see a greater emphasis on waste minimisation and prevention, with active measures to move waste up the hierarchy and tougher measures to reduce waste to landfill. This involves implementing proposals focussed at	Noted and agreed. These themes will be promoted through further stages of the SA/SEA.



Consultee	Comment	Action
	the higher end of the hierarchy, ultimately aiming for zero wastage to landfill, promoting waste behavioural change through campaigns and education and also promoting opportunities for renewable energy from waste technologies and residual waste.	
	<p>2.) The figures used in paragraph 5.2.3 of the Scoping Report for the importation of London's waste do not concur with the final figures as presented in the Draft RSS of March 2010.</p> <p>There should also be an awareness that the Thames Tideway Projects may also be producing Construction, demolition (C&amp;D) and excavation waste which may find its way into Essex.</p>	Draft RSS figures revised to reflect final March 2010 figures. However the situation has progressed since this consultation and the document reflects the changes implemented since the formation of a Coalition Government in May 2010. C&D waste from Thames Tideway Projects noted and added as a key issue in the Waste section.
	<p>3.) The Batteries and Accumulators Directive 2006/66/EC should be included under the international heading in the Plans and Programmes Annex (A) and Table 3 of the Scoping Report. The Hazardous Waste Regulations were also amended in 2009. Tables 3 and 4 (and Annex A) should include the Mining Waste Directive 2006/21/EC under the International heading.</p>	These plans and programmes have been added to the list of Plans and Programmes in the Sustainability Appraisal Report and within Annex A.
	<p>4.) Scoping Report Annex B (Table 8) – There seems to be some confusion over the inclusion of golf courses under the inert landfill site description. If done correctly, the construction of a golf course using inert waste is seen as a recovery operation and not a landfill which is a disposal operation and thus permitted accordingly. Therefore references to golf courses under inert landfills should be removed.</p>	Golf courses removed from Table 8 Inert Landfill Sites. Golf course development using C&D waste in the Plan Area has been added as a separate table with a description of key issues surrounding this taken from 'Development Involving County Matters – Guidance Notes (Essex County Council, March 2009)'
	<p>5.) The first line of text in section 2.2.3 refers to Table 9 rather than Table 8. The text should read "Table 8 shows inert landfill sites in the study area." This needs correcting.</p>	Corrected accordingly.
	<p>6.) Table 7 (page 14) of the Scoping Report – In the County and Unitary section of Table 7 there is no mention of Essex Red Data List Species (list maintained by Essex Field Club) that should be considered with any new waste development.</p>	Reference to Essex Red Data List Species has been added to the relevant sections.
	<p>7.) There is no mention of National Red Data Book (RDB) species that should be considered with new developments. There are</p>	Reference to National Red Data Book species has been added to the relevant





Consultee	Comment	Action
	several important RDB species such as the Shril Carder Bee that area associated with Brownfield habitats that may be found on potential waste disposal sites.	sections.
	8.) Section 5.5 of the Scoping Report – There is no mention of Brownfield habitats that are often found in South Essex. Although, green belt development should be avoided where possible it is often best to allow development on low ecological quality arable farmland instead of high quality Brownfield sites which may contain important RDB invertebrate assemblages.	The significance of Brownfield habitats has been included within Section 5.6 - Biodiversity of the Scoping Report and under Section 6 - Biodiversity of Annex B.
	9.) Water Quality – (Section 5.7.2 of the Scoping Report). A key objective of the Water Framework Directive is to achieve at least good status for all waters by 2015.  Where this is not possible, good status should be achieved by 2021 or 2027. In line with the aims of the WFD due consideration should be given to the ensuring that there is no decline in water quality resulting from waste management and disposal facilities.	WFD targets added to Section 5.7.2 – Water Quality of the Scoping Report and Section 7 – Water Quality of Annex B.  The targets have also been included as a key issue in the Water Quality section of Table 18: Key Sustainability Issues and Existing Problems.
	10.) It should be ensured that landfill and new waste management facilities do not have a detrimental effect on surface and groundwater sources. Methods to contain waste related leachate is an important factor in protecting water sources. Consideration should be given to ensuring that sites identified under the Waste Development Plan Documents (WDPD) are located in sustainable locations, having considered site characteristics in relation to all water sources.	Noted and included as a key issue in the Water Quality section of Table 18: Key Sustainability Issues and Existing Problems.
	11.) Flooding – Where available Strategic Flood Risk Assessments (SFRA) should be used as part of the evidence for applying the Sequential Test. The SFRA should be used to inform the Sustainability Appraisal of the Local Development Documents (paragraph E5 of PPS25).	Noted, an SFRA for the Waste Development Plan Documents is currently being undertaken, and the results of which will inform the Sustainability Appraisal.
	12.) Whilst flooding resulting from rivers and surface water runoff is considered in the Scoping Report there is only minor reference to tidal flooding. Consideration of coastal flooding should be considered further in the report to ensure all sources of flooding are accounted for.	Coastal flooding issues have been included in the key questions forming part of the Sustainability Framework for both Policy and Site Assessments.
	13.) Additional documents including Catchment Flood Management Plans and Shoreline Management plans, together	Noted. These plans and programmes have been added to the list of Plans and



Consultee	Comment	Action
	with consideration of the Thames Estuary 2100 (TE2100) Project may also be useful in identifying both broad locations and strategic site allocations.	Programmes in the Sustainability Appraisal Report and within Annex A.
	14.) An important consideration in managing defences and potential habitat creation in South Essex is the presence of waste in seawalls and adjacent areas behind seawalls.	Noted. The issue will be considered in light of the appraisal of relevant options.
	15.) Annex A – Table 11, under the National heading, should also include: Planning Policy Guidance 25 Supplement: Development and Coastal Change Practice (March 2010). The County & Unitary section of Table 11 should include: North Essex Flood Management Plan – Summary Report (December 2009) and the South Essex Flood Management Plan – Summary Report (December 2009).	These plans and programmes have been added to the list of Plans and Programmes in the Sustainability Appraisal Report and within Annex A.
	16.) Southend-on-Sea Borough Council is currently in the process of producing an up-to- date Level 1 and Level 2 Strategic Flood Risk Assessment (SFRA) which is expected to be finalised in 2010. It is recommended that this assessment is considered as part of the SA/SEA evidence base.	Noted. The emerging document will be added to the list of Plans and Programmes in the Sustainability Appraisal Report and within Annex A and utilised in the appraisal of relevant options.
	17.) Sustainability Objectives – Biodiversity: Table 20, Page 47: Objective 1 states “To protect and enhance biodiversity and geological diversity throughout Essex and Southend.” Within this objective there is no mention of Brownfield habitats as needing to be assessed for any waste application.	The issue of Brownfield habitats has been included within this sustainability objective as a key question in both policy and site assessment criteria.
	18.) Sustainability Objectives – Waste: Table 20, Page 54-55: Objective 9 reads “To ensure the sustainable management of waste, minimise the quantity of waste landfilled and to maximise the re-use, recovery and recycling of waste.” It is recommended that this objective also include the promotion of minimisation of waste produced at source.	The objective has been changed to read, “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.”
	19.) There appears to be no mention within the Scoping Report of the developing Shoreline Management Plan (SMP) and how coastal policies could affect waste sites in the future.	The draft Essex and South Suffolk Shoreline Management Plan 2 has been added to the list of Plans and Programmes in the Sustainability Appraisal Report and within Annex A.  The details of the SMP will be utilised to



Consultee	Comment	Action
		inform the appraisal process where relevant.
	20.) Surface Water Management	Although no recommendations were made by the Environment Agency on surface water management, details of the general requirements were included within their consultation response. These have been noted to inform the appraisal of the WDPD.

#### WDD Issues and Options SA, 2010

Essex County Council (Historic Environment)	SA/SEA Scoping Report (March 2010) In the main, The Historic Environment is dealt with rather well.	Noted
	However Spatial Options 2 and 3 state 'there is uncertainty where mitigation measures are unknown' implying that where this is not mentioned in Option 1 that the mitigation measures are known which is unlikely. This should stress the importance of developing adequate mitigation measures.	Noted, for Option 1, it was noted that 'The impacts are uncertain until the specific details of each expansion proposal are known, responding to scale, distances to historic features etc. Given the prevalence of historical features in the plan area, it strengthens the importance of mitigation measures to offset any aesthetic or otherwise disruptive impacts of the site on such features in certain locations and involving certain operations.'  It is agreed that it would be important to develop adequate mitigation measures where required.
	In the next SA/SEA the Cultural Heritage Chapter should draw on the new PPS5 as well as PPS10. This will be important to support the text in Table 18 Key Sustainability Issues and Existing Issues, where the importance of setting and undesignated assets is clearly implicit.	Noted, and at this stage the draft NPPF is also a consideration.

#### WDD Preferred Options SA, 2011

N/A – The plan making process was largely re-started due to the changes in National Policy and circumstances, and the pause



Consultee	Comment	Action
	between 2011 and 2015 (below).	

#### RWLP SA Scoping Report, 2015

Historic England	<p>Broadly speaking, we consider that the objectives are appropriate and cover all areas of interest without repetition. In terms of the SA objective for the historic environment, we recommend using the overarching wording contained within our SA/SEA guidance document:</p> <p>“To conserve and enhance the historic environment, heritage assets and their settings”</p> <p>The current wording for SA Objective 5 uses an incorrect term (“historical”) and separates cultural heritage and features of archaeological importance, which are part of the historic environment and can be heritage assets in their own right.</p>	Objective changed to reflect suggested wording.
	<p>The key questions for SA Objective 5 in Table 5 are reasonable, although should refer to policies as well as sites. In particular, the second question needs to be amended and would be clearer if it read “Does it ensure that policies and sites will not negatively affect the significance of designated heritage assets (including their setting)?”</p>	Key question changed to reflect suggested wording.
	<p>The site pro-forma contains a reasonable approach to assessment of sites against SA Objective 5 (although Ancient Woodland belongs under a different objective). It helpfully avoids a proximity test in terms of distance between site and heritage asset, and allows for a more nuanced assessment. However, we would argue that positive effects occur not when there are insignificant or no effects on heritage assets, but when a site enhances the significance of a heritage asset. The No Impact “0” score should be used where there is no or little impact (not the Positive and Significant Positive scores, which should be used for genuine positive effects).</p> <p>The same applies to the scoring against SA Objective 6 for landscape and townscape.</p>	<p>The approach to predicting impacts in the SA has not been changed, in order to reflect a consistent approach to positive predictions across all other objectives.</p> <p>The approach of assessing ‘no impacts’ positively also allows a larger degree of accuracy, where a scale of positive impacts exists within the Pro Forma.</p>
Natural England	<p>We are satisfied that the scoping report has been prepared in accordance with the requirements of the SEA Directive, as transposed through the Environmental Assessment of Plans and Programmes Regulations 2004. We believe the report includes</p>	Noted.



Consultee	Comment	Action
	<p>consideration of relevant aspects of the environment including objectives for the protection and enhancement of biodiversity and geodiversity, including designated sites, landscape and soils and the need to address climate change.</p> <p>We welcome reference to Accessible Natural Greenspace Standard (ANGSt) in the Glossary of Acronyms and would recommend that this is discussed within the text of the scoping report as this is relevant to the protection and enhancement of green infrastructure. The report should also reference and consider the objectives of the local green infrastructure strategy and the Essex Biodiversity Action Plan.</p>	

#### RWLP Revised Preferred Approach SA, 2015

Natural England	Natural England is of the opinion that the accompanying Sustainability Appraisal and Habitats Regulations Assessment have adequately addressed all of the relevant issues.	Noted. No actions necessary.
Basildon Borough Council	<p>The Council objects to the decision not to undertake Sustainability Appraisal (SA) on each Area of Search as stated in section '5.1 Areas of Search'. Areas of Search are recognised as specific areas for consideration within the Revised Preferred Approach and they have established area boundaries. Therefore to ensure compliance with legislation SA should be applied to these areas. It will also help inform the selection of the Areas of Search, if they progress to the next stage of the RWLP, because SA provides a more detailed level of assessment. Furthermore whilst the principle of development for B2 and B8 uses have been established in parts of these areas, there has been no prior consideration as to the impact of sui generis uses such as waste facilities on many of these sites.</p>	<p>Within the Plan, Areas of Search have been designated where, in principle, the Waste Planning Authorities may support waste management development outside of the allocated sites. 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. 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 facilities.</p> <p>Unlike site allocations, Areas of Search have not been promoted by landowners for a particular waste management use, exact site boundaries are not defined,</p>



Consultee	Comment	Action
		<p>and they are not designated to manage a specific waste stream. The rationale behind this approach is to ensure that Areas of Search are able to respond flexibly to the market and as such, Areas of Search have been chosen using bespoke selection criteria found within the Plan's evidence base document, 'Areas of Search: Assessment and Methodology.' This methodology recognises that only a high-level 'in principle' assessment has been made of an Area of Search's suitability for waste development and proposals will be required to demonstrate conformity with the Development Plan by way of a full application. The SA of the Revised Preferred Approach RWLP (2015) explored whether the criteria used by the WPAs to identify suitable areas for potential future waste management facilities was a sustainable approach, and explored reasonable alternative approaches to this methodology. Qualifying sites or areas have been selected in line with the criteria of the assessment methodology, which has been deemed the most sustainable approach in light of all reasonable alternatives explored at the revised Preferred Approach stage (2015) and Pre-Submission Waste Local Plan.</p> <p>The rigorous assessment of the sustainability of the specific Areas of Search has not been required. The SA assesses the impacts of the Plan's allocated sites, which should they be forthcoming, will sufficiently meet all identified shortfalls in capacity for waste in the Plan Area where practicable. With this in mind, specific facility types can not be identified on any given Area of Search and neither can any requirement for waste management facilities in the first</p>



Consultee	Comment	Action
		instance.
	<p>The report does not reference the most up to date version of the emerging Basildon Borough Local Plan. It should refer to the Basildon Borough Local Plan Core Strategy Revised Preferred Options (Dec 2013). As such, the Council questions whether the Revised Preferred Approach and the Sustainability Appraisal have adequately considered the in-combination effects of the RWLP with other emerging Local Plans. Also the main aims and objectives for this refer to the Local Development Framework when it should say Local Plan.</p>	<p>Noted. The SA of the Pre-Submission Waste Local Plan has updated all District / Borough and City Council Local Plan progress within Annex A - Plans and Programmes and considered the content of these where relevant to the Waste Local Plan.</p>

#### RWLP Pre-Submission SA, 2016

<p>Anglia Water 366992 (854)</p>	<p>Paragraph 4.25</p> <p>Page 27 Para 4.25. Wastewater Treatment Works (WWTW) are now referred to as Water Recycling Centres (WRC) by Anglian Water.</p> <p>Section 6 Need and Safeguarding</p> <p>In the view of Anglian Water, a safeguarding area (or encroachment zone) corresponding to an initial 400 metres consultation zone is justified rather than a 250 metres consultation zone as suggested in Policy 2 – ‘Safeguarding Waste Management Sites’. The purpose of Anglian Water Encroachment Policy is not to provide a blanket ban on development within 400 metres of the works, it is rather to establish a distance within which it can be demonstrated that the proposed development will not be adversely affected by odour or other issues.</p> <p>Water Recycling Centres (also referred to as Wastewater Treatment Works) represent significant capital investments which, by their nature, are difficult and expensive to relocate. As such, a distance of 400 metres should be used as an initial consultation zone to prevent incompatible development and associated loss of amenity and to enable assessment that will determine a suitable distancing a suitable unless it can be demonstrated that there will be no adverse effect on potential occupiers.</p> <p>I attach for your information link to Anglian Water Policy on encroachment: <a href="http://www.anglianwater.co.uk/developers/encroachment.aspx">http://www.anglianwater.co.uk/developers/encroachment.aspx</a></p> <p>Generally, in relation to water and wastewater assets within the boundary of the sites, Anglian Water would require the standard</p>	<p>Should the WPAs increase the waste consultation zones around WRCs ahead of examination, it is not considered that there would be any significant effects to factor into the Pre-Submission SA. The principle of extending the WRCs so as to ensure that proposed development will not be adversely affected by odour or other issues would have minor positive impacts on sustainability.</p>
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Consultee	Comment	Action
	<p>protected easement widths for these assets and for any requests for alteration or removal to be conducted in accordance with the Water Industry Act 1991. Within the easement strips there should be no building over or restriction of access (required for routine maintenance and emergency repair).</p> <p>Set out below is the standard easement width requirements:</p> <p>Standard protected strips are the strip of land falling the following distances to either side of the medial line of any relevant pipe; 2.25 metres where the diameter of the pipe is less than 150 millimetres, 3 metres where the diameter of the Pipe is between 150 and 450 millimetres, 4.5 metres where the diameter of the Pipe is between 450 and 750 millimetres, 6 metres where the diameter of the Pipe exceeds 750 millimetres.</p>	
<p>NDA &amp; Magnox 990352 (883)</p>	<p>It is noted that previous representations made by Magnox have not been fully taken into account with regard to the Policy's wording. Magnox considers further revision to the policy is required for the reasons given above, and requests that the policy is amended as follows:</p> <p>Policy 7: Radioactive Waste Management at Bradwell-on-Sea</p> <p>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>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;</p> <p>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> <p>c) the proposals would not cause any unacceptable adverse impacts to the environment, human health or local amenity.</p>	<p>It is considered that should the recommended amendment be made by the WPAs, there would be no resultant change in the SA of this policy. This is due to successful proposals still being required to adhere to criteria a) to c), which are not recommended to be amended, and which have been assessed as adequately ensuring that any possible negative impacts are mitigated.</p>
<p>Essex Bridleways Association 908048 (335)</p>	<p>Paragraph 9.33</p> <p>Pleased to note that Point 9.33 refers to the protection of the rights of way network. However would like to see a much stronger commitment to the improvement of the network in accordance with the Rights of Way Improvement Plan.</p>	<p>It is considered that should the recommended amendment be made by the WPAs, there would be no significant resultant change in the SA of this policy. The inclusion of the recommended content to paragraph 9.33 would ensure an additional minor positive impact, provided that the enhancement of</p>





Consultee	Comment	Action
	<p>Suggested change to para 9.33</p> <p>The 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, 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, and the closure of a PROW, where no alternative route is provided, will not normally be acceptable.</p>	<p>upgrading of PROWs is suitable for restoration schemes on a site-by-site basis.</p>
<p>Environment Agency 909680 (625)</p>	<p>We consider that water quality and quantity are quite separate and distinct matters, particularly with the high level protection directed towards the former by virtue of the Water Framework Directive (WFD). Overall, we still consider that our proposed re-wording is a better approach.</p> <p>Suggested change:</p> <p>Bullet point b of Policy 10 should be re-worded to read:</p> <p>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'</li> </ul> <p>An additional bullet point should be added covering water quantity which should read as follows:</p> <ul style="list-style-type: none"> <li>• 'The quantity of water for resource purposes within water bodies'</li> </ul> <p>Also the assessment of the impact of a waste development on a water body requires consideration in terms of deterioration of the existing status or failure to achieve the objective of 'good status'. It is not just a matter of determining in terms of whether the waste development would cause an unacceptable impact. Where a waste development is likely to cause deterioration in the status of a water body, it must be prevented, unless there is a derogation in place.</p>	<p>It is considered that should the recommended amendment be made by the WPAs, there would be no resultant change in the SA of this policy. This is due to a significant positive impact already having been highlighted for the relevant Sustainability Objective (SO2). Nevertheless, it is acknowledged that there would be an enhancement of this significantly positive impact should the amendment be made.</p>
<p>British Horse Society 988224 (643)</p>	<p>Para 9.33 refers to the protection of the rights of way network but there should be a much stronger commitment to the improvement of the network in accordance with the Rights of Way Improvement</p>	<p>It is considered that should the recommended amendment be made by the WPAs, there would be no significant resultant change in the SA of this policy.</p>



Consultee	Comment	Action
	<p>Plan, which has an emphasis on the further provision of bridleways, within the Replacement Waste Local Plan.</p> <p>Para 9.33 should be amended to read:</p> <p>“The 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, 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, and the closure of a PROW, where no alternative route is provided, will not normally be acceptable.”</p>	<p>The inclusion of the recommended content to paragraph 9.33 would ensure an additional minor positive impact, provided that the enhancement of upgrading of PROWs is suitable for restoration schemes on a site-by-site basis.</p>
<p>NDA &amp; Magnox 990352 (882)</p>	<p>Appendix A Para A.11</p> <p>Appendix A details the policy context. 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.</p> <p>For clarity, Magnox requires that Appendix includes reference to the following:</p> <ul style="list-style-type: none"> <li>• LLW Strategy (February 2016)</li> <li>• NDA Strategy III (April 2016)</li> <li>• NPS EN-6 Nuclear</li> </ul> <p>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.</p>	<p>The inclusion of this policy context would be added to the SA Annex A – Plans and Programmes and the relevant section of the SA Environmental Report.</p> <p>Nevertheless it is considered that there would be no changes required to the SA Environmental Report related to any highlighted impacts arising from the Waste Local Plan.</p>
<p>Historic England 986378 (756)</p>	<p>Seek policy wording to the effect that 'there should be no adverse impacts on the historic environment and where possible suitable enhancements sought'.</p>	<p>It is considered that should the recommended amendment be made by the WPAs, there would be no significant resultant change in the SA of this policy.</p> <p>This is due to a significant positive impact already having been highlighted for the relevant Sustainability Objective (SO5). Nevertheless, it is acknowledged that</p>



Consultee	Comment	Action
		there would be an enhancement of this significantly positive impact should the amendment be made.

#### RWLP Main Modifications SA, 2016

985065 (46),	<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>Appendix 1 The Waste Challenge at a Glance</p> <p>4.21 Non Hazardous Waste</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 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,</p>	<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 consultation.</p> <p>The impacts of modifications associated with Rivenhall regarding the transportation of waste and haulage distances can be seen to have increased</p>
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Consultee	Comment	Action
	<p>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>	<p>impacts, but not 'significant' impacts as identified consistently within the SA throughout the 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 can not 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-</p>



Consultee	Comment	Action
		<p>2026.</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 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 can not 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>
1059617 (48)	<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 clause directs residual waste from London post 2026 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.</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</p>	Please see response to Modification 1 above.



Consultee	Comment	Action
	<p>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)	<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> <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</p>	Please see response to Modification 1 above.



Consultee	Comment	Action
	<p>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>	
<p>1060507 Coggeshall Neighbourhood Plan 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>	<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. 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</p>	<p>Please see response to Modification 1 above.</p>



Consultee	Comment	Action
	of this modification.	
1059617, 230	<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. 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>	Please see response to Modification 1 above.
746050, Rivenhall Parish Council, 481	<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 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.</p>	Please see response to Modification 1 above.





Consultee	Comment	Action
<p>922693, Henham Parish Council, 27</p>	<p>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 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 is 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</p>	<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 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, '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'. Additionally, 'Appendix B – Allocated Sites: Development Principles' of the Plan, includes for the site at Elsenham, '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,</p>



Consultee	Comment	Action
	<p>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>	<p>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 SA concludes that the general and site specific Policy context of the Plan is adequate in ensuring that any potential impacts are mitigated.</p>
<p>1060507, Coggeshall Neighbourhood Plan Committee, 89</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 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>	<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 can not 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</p>



Consultee	Comment	Action
		<p>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>
<p>1063440, Natural England, 503</p>	<p>Sustainability Appraisal and Strategic Environmental Assessment Addendum (November 2016) Recommendation - revision to text on water resources. 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: b. 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 to the following: 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</p>	<p>This comment is considered relevant to the major modification itself, rather than its assessment in the SA Addendum. As such, no response is deemed necessary in this report.</p>
<p>East of England Co-operative Society 990357 (71)</p>	<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</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 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</p>



Consultee	Comment	Action
	<p>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 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 pro-forma 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 existing East of England Co-operative retail store.</p>	<p>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>
<p>1063440, Natural England, 502</p>	<p>Sustainability Appraisal and Strategic Environmental Assessment Addendum (November 2016) Support.</p>	<p>Noted.</p>
<p>985065 (47), 1060507 (89), 477311 (98),</p>	<p>Accompanying SA/SEA Environmental Report – this document makes assessments on whether the proposed Modifications have significant (as opposed to minor) sustainability impacts Table 16 Rivenhall CHP</p>	<p>Please see response to Modification 8 above.</p>



Consultee	Comment	Action
618724, 516	<p>360,000 tpa</p> <p>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 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	<p>THERE HAVE BEEN CHANGES TO SIZE AND SCALE OF THE SITE AND OUTPUT WHICH SEEM TI 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 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>	Please see response to Modification 8 above.



Consultee	Comment	Action
<p>988283, Bradwell with Pattiswick Parish Council, 239</p>	<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 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>	<p>Please see response to Modification 8 above.</p>
<p>1062089, Coggeshall Parish Council, 332</p>	<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</p>	<p>Please see response to Modification 8 above.</p>



Consultee	Comment	Action
	<p>energy produced and a significant increase in CO2 outputs thereby questioning the energy from waste element aspect. 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</p>	
743809, 469	<p>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.</p>	Please see response to Modification 8 above.
1063344, 477	<p>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.</p>	Please see response to Modifications 1 and 8 above.
911132, Crossing Parish Council, 526	<p>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 proposed Rivenhall site would still be classed as CHP (combined heat and power)</p>	Please see response to Modification 8 above.



Consultee	Comment	Action
	<p>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.</p> <p>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>	
<p>1064243, Historic England, 531</p>	<p>Sustainability Appraisal and Strategic Environmental Addendum We have no comments to make on the modifications to this document.</p>	<p>Noted.</p>





## 5. The Reasons for Choosing the Plan as Adopted in light of other Reasonable Alternatives...

### 5.1 Reasonable Alternatives in the SA Process

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The Replacement Waste Local Plan policies, site allocations, vision and aims and objectives have been the result of a significant plan-making process. In this process, numerous alternative approaches have been explored and consulted upon.

Alternatives for all these elements are chronicled in the following tables, alongside the reasons for their rejection of selection.



**Table 3: How the results of Consultations have been taken into account: The Strategy**

Policy	Alternative Explored in Plan Making Process	Reason for Rejection / Selection
The Vision	Essex County Council and Southend-on-Sea Borough Council Joint Waste Development Document: Issues and Options (2010) – Suggested content	At this stage, suggested aims were consulted upon with consultees asked whether they agree with the content, and whether they could offer any suggested amendments or other recommendations as to the Vision's content. As such, the Vision was developed from this starting point.
	Essex County Council and Southend-on-Sea Borough Council Joint Waste Development Document: Preferred Approach (2011) – Preferred content	The Issues and Options consultation put forward the suggested Vision and requested comments on these, but did not provide distinct alternative options as none could be considered reasonable in response to the WPAs' requirements and remit. The Vision was progressed at this stage.
	Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015) – Preferred content	At this stage the Vision built on the principles of the 2011 Preferred Approach Vision, but was amended to conform to the NPPF and Planning Practice Guidance. The Vision at this stage is similar and largely indistinct from that of the Pre-Submission.



Policy	Alternative Explored in Plan Making Process	Reason for Rejection / Selection
	<p>Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015) – Alternative 1: A variation to plan more strictly for self-sufficiency (this constituted a re-exploration of those previous approaches within the context of current national requirements).</p>	<p>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.</p>
Strategic Objectives	<p>Essex County Council and Southend-on-Sea Borough Council Joint Waste Development Document: Issues and Options (2010) – Suggested content</p>	<p>The overall approach was progressed at the time but has since been rejected in favour of a more streamlined approach that has an added emphasis on flexibility and what is practicable (in the context of what is required of WPAs and the remit of Waste Local Plans).</p>
	<p>Essex County Council and Southend-on-Sea Borough Council Joint Waste Development Document: Preferred Approach (2011) – Preferred content</p>	<p>This approach was aligned to the Plan's primary focus in terms of what is practicable and tailored to (then) current requirements, conditions and capacity gap analysis. As such elements of this approach were progressed and those omitted were representative of national requirements that have since been superseded in the NPPF.</p>
	<p>Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015) - Preferred content</p>	<p>This approach is aligned to the Plan's primary focus in terms of what is practicable and is also more tailored to current requirements, conditions and capacity gap analysis. Changes in national requirements and guidance since 2011 (when the previous Strategic Objectives were developed and appraised) have also dictated the Preferred Strategic Objectives.</p>



Policy	Alternative Explored in Plan Making Process	Reason for Rejection / Selection
	<p>Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015) - Alternative 1: Re-explored notion of previous iterations of Objectives. These were larger in number and broadly wider ranging to reflect added emphasis on net self-sufficiency</p>	<p>Previous approaches could be considered to be less aligned to the Plan's primary focus in terms of what is practicable and also more tailored to previous requirements pre-NPPF, which was a less flexible approach over the plan period. Changes in national requirements and guidance since 2011 have also dictated the Preferred Strategic Objectives. As such, and in line with the Strategic Objectives reflecting the Vision and being expanded on in more detail through the Local Plan's Preferred Approaches, no additional specific alternative approaches to the Strategic Objectives have needed identification for appraisal. The Strategic Objectives at this stage have been progressed and also represent the content of the Pre-Submission objectives.</p>
The Spatial Strategy	<p>Essex County Council and Southend-on-Sea Borough Council Joint Waste Development Document: Issues and Options (2010) – Option 1: Expansion and co-location with existing facilities</p>	<p>This option was rejected, although a hybrid option was developed and progressed.</p> <p>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 was rejected.</p>
	<p>Essex County Council and Southend-on-Sea Borough Council Joint Waste Development Document: Issues and Options (2010) – Option 2: Existing Key Urban Centres of Population and Growth</p>	<p>This option was rejected, although a hybrid option was developed and progressed.</p> <p>This approach would 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 growth targets and the requirements of the NPPF for Local Planning Authorities (LPAs) to objectively assess their needs for growth. The alternative is limited in its scope to adapt to changing circumstances in the Plan Area and for these reasons this alternative was rejected.</p>



Policy	Alternative Explored in Plan Making Process	Reason for Rejection / Selection
	<p>Essex County Council and Southend-on-Sea Borough Council Joint Waste Development Document: Issues and Options (2010) – Option 3: De-centralised approach</p>	<p>This option was rejected, although a hybrid option was developed and progressed.</p> <p>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.</p>
	<p>Essex County Council and Southend-on-Sea Borough Council Joint Waste Development Document: Issues and Options (2010) – Option 4: Areas with limited existing capacity</p>	<p>This option was rejected, although a hybrid option was developed and progressed.</p> <p>The alternative fails to respond to the proximity principle within the Plan Area and may be seen as too heavily influenced by London imports. Waste data is also not collected at the district-level, so ascertaining where there is local level need is not possible. For these reasons the option was rejected.</p>
	<p>Option 5: A hybrid option (of the above Options 1-4)</p>	<p>N/A - A Hybrid Option was not appraised at this stage due to the uncertainty of which other Options' elements would be included. The specifics of the hybrid option were explored as the Preferred Approach for the overall Spatial Strategy in 2011.</p>
	<p>Essex County Council and Southend-on-Sea Borough Council Joint Waste Development Document: Preferred Approach (2011) – Preferred content (hybrid option developed from the options explored at the Issues and Options stage)</p>	<p>At the Issues and Options stage, a number of alternative options for defining the overall spatial strategy were suggested. A hybrid approach was taken forward as the Preferred Approach as this option was favoured by Consultees and allowed flexibility for the waste industry. The three sites with planning permission for Integrated Waste Management Facilities at Stanway (Colchester), Rivenhall (Braintree) and Courtauld Road (Basildon) were allocated for safeguarding as they had been shown to be suitable sites for waste management through gaining planning permission. Once developed, these sites were anticipated to make a significant contribution to meeting the capacity gap for municipal, commercial and industrial waste recycling and treatment. Two of the facilities are close to the key urban centres and the</p>



Policy	Alternative Explored in Plan Making Process	Reason for Rejection / Selection
		<p>third is close to one of the smaller centres although centrally located. Therefore, it was identified that that they should be protected from other non-compatible developments by safeguarding these sites for waste management. At the Pre-Submission stage this previously preferred Spatial Strategy can be seen as unviable due to the status of the IWMF at Stanway. As such this approach has since been rejected in favour of a more flexible approach that does not include this IWMF.</p>
	<p>Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015) – Preferred content</p>	<p>The Spatial Strategy at the Revised Preferred Approach (2015) stage responded to a more flexible iteration of the previous hybrid of strategy options explored at both the Issues and Options (2010) and previous Preferred Approach (2011) stages. It's most notable change reflects less focus on the IWMFs. This has allowed the strategy to better reflect notions of distribution throughout the Plan Area and the positive elements of the alternative strategy options explored throughout the plan-making process whilst also becoming more flexible in line with growth in the county over the Plan period. Since 2012, the NPPF has required district level growth targets to be objectively assessed; a significant change in approach from the top-down figures of the RSS.</p> <p>Local Planning Authorities will have their objectively assessed needs independently examined through the Local Plan making process as district-level Local Plans approach adoption. At present the districts, boroughs and unitaries within the Plan Area are at widely different stages of the Local Plan making process and as such the RWLP can only make assumptions regarding the broad growth needs of the Plan Area. This requires the RWLP to be flexible not only in the allocation of strategic sites, but also in formulating approaches that can sustainably plan for any additionally required and non-strategic sites. Within the Spatial Strategy at the Revised Preferred Approach stage this was reflected through the locational criteria for new sites and the methodology behind identifying areas-of-search; where the principle of development for waste management facilities has been assessed. Regarding the allocation of</p>



Policy	Alternative Explored in Plan Making Process	Reason for Rejection / Selection
		<p>sites within the Plan, the Spatial Strategy responds to the sustainable, available and viable sites that came forward in response to the Plan's call-for-sites. As such the preferred strategy reflected the most sustainable option in response to previous consultations, security and flexibility. The Spatial Strategy at the Revised Preferred Approach (2015) stage is largely similar to that of the Pre-Submission stage, and as such can be considered to be selected and progressed to that stage, subject to more detail on Areas of Search and locational criteria based policies.</p>
	<p>Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015) – Alternative 1: Issues &amp; Options A – Expansion and co-location with existing facilities (this was a re-exploration of the original option explored at the Issues and Options stage, to assess its performance in the context of current national requirements)</p>	<p>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.</p>
	<p>Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015) – Alternative 2: Issues &amp; Options B – Existing key urban centres of population and growth (this was a re-exploration of the original option explored at the Issues and Options stage, to assess its performance in the context of current national requirements)</p>	<p>This approach would 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 growth targets and the requirements of the NPPF for Local Planning Authorities (LPAs) to objectively assess their needs for growth. 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.</p>
	<p>Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015) – Alternative 3: Issues &amp; Options C – De-centralised approach (this was a re-exploration of the original option explored at the Issues and Options stage, to assess its performance in the</p>	<p>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</p>



Policy	Alternative Explored in Plan Making Process	Reason for Rejection / Selection
	context of current national requirements)	the alternative has been rejected.
	Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015) – Alternative 4: Issues & Options D – Areas with limited existing capacity (this was a re-exploration of the original option explored at the Issues and Options stage, to assess its performance in the context of current national requirements)	The alternative fails to respond to the proximity principle within the Plan Area and may be seen as too heavily influenced by London imports. Waste data is also not collected at the district-level, so ascertaining where there is local level need is not possible. For these reasons the option was rejected.
	Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015) – Alternative 5: Issues & Options E – A hybrid option (Previous Preferred Approach [WDD]) - The WPAs will address the waste management capacity requirements for the Plan area by safeguarding a network of existing, strategic waste management facilities and the three strategic sites with planning permission for Integrated Waste Management Facilities at Stanway (Colchester), Rivenhall (Braintree) and Courtauld Road (Basildon) to support the additional Preferred Site allocations for strategic recycling and recovery facilities to meet the capacity gap. Should any further sites be required, flexibility is provided through the locational criteria-based Preferred Approaches and development management requirements (this was a re-exploration of the original option explored at the Issues and Options stage, to assess its performance in the context of current national requirements).	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.
	Essex County Council & Southend-on-Sea Borough Council Replacement Waste Local Plan: Pre-Submission (2016)	The Pre-Submission Spatial Strategy draws on, and is largely similar to, that of the Revised Preferred Approach (2015). The key difference between these two versions of the Spatial Strategy is a heightened degree of flexibility within the Plan Area, emanating from the inclusion of those employment areas identified through the Plan's Areas of Search process and





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		<p>locational criteria policies. In order to direct waste management facilities serving a predominantly local need towards appropriate locations, Areas of Search have been designated; the methodology for this having been explored in the Revised Preferred Approach (2015) Plan and subject to SA at that stage with a range of positive impacts. 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. For the purposes of ensuring the further flexibility of the Plan, this approach has been selected.</p>

**Table 4: How the results of Consultations have been taken into account: Policies**

Policy	Alternative Explored in Plan Making Process	Reason for Rejection
<p>Policy 1 – Need for Waste Management Facilities</p>	<p>Essex County Council and Southend-on-Sea Borough Council Joint Waste Development Document: Issues and Options (2010) – Suggested waste arisings, capacity and future requirements</p>	<p>The Essex County Council and Southend-on-Sea Borough Council Waste Development Document Capacity Gap Report (May 2010) identified three scenarios that were used to forecast future arisings. At the time, these responded to the Adopted Regional Spatial Strategy (RSS), adopted in 2008, The Submitted Draft of the Revisions to the RSS until 2031 (the 'Submitted RSS'), and a hybrid of Local Waste Strategy MSW Projections and the Submission RSS Scenario for All Other Waste Streams. Where such forecasted arisings were aligned to the Regional Spatial Strategy and in response to the top-down growth targets for the Plan Area's Districts / Boroughs / Unitary, no other alternative approaches were considered reasonable at this stage.</p>



Policy	Alternative Explored in Plan Making Process	Reason for Rejection
	<p>Essex County Council and Southend-on-Sea Borough Council Joint Waste Development Document: Preferred Approach (2011) - Suggested waste arisings, capacity and future requirements</p>	<p>The Essex County Council and Southend-on-Sea Borough Council Waste Development Document Capacity Gap Report (May 2010) identified three scenarios that were used to forecast future arisings. At the time, these responded to the Adopted Regional Spatial Strategy (RSS), adopted in 2008, The Submitted Draft of the Revisions to the RSS until 2031 (the 'Submitted RSS'), and a hybrid of Local Waste Strategy MSW Projections and the Submission RSS Scenario for All Other Waste Streams. Where such forecasted arisings were aligned to the Regional Spatial Strategy and in response to the top-down growth targets for the Plan Area's Districts / Boroughs / Unitary, no other alternative approaches were considered reasonable at this stage.</p>
	<p>Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015) - The Preferred Approach (now Alternative 1) for CD&amp;E arisings is a mid-range scenario of two scenarios reflecting the best and worst case of estimating arisings (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).</p>	<p>At the Revised Preferred Approach (2015) stage forecasting for non-hazardous organic waste (for biological treatment [this waste stream is a combination of the Local Authority Collected Waste (LACW) stream and the commercial and industrial (C&amp;I) waste stream]) looked at (for C&amp;I wastes) local arising estimations plus Greater London Local Plan arising estimations, and (for LACW) data supplied by local authorities. Regarding the LACW waste stream, the Revised Preferred Approach (2015) looked at a scenario of 0% annual growth in waste arisings over the Plan period due to population increases being offset by existing and planned future minimisation measures. This approach was based on the levels of recycling and composting of household waste as set out in Waste Strategy for England 2007 and presented in the adopted 2008 Joint Municipal Waste Management Strategy (JMWMS). The new forecasting methodology used for the Pre-Submission Plan instead assumes the growth rates applied in the national Defra central forecast (0.2% per annum) to the Baseline Projection and extrapolates that forward to the end of the Plan period. This is more in line with, and follows the guidance of the PPG, which requires a level of growth to be considered and added flexibility within the Plan. As a result the 0% annual growth scenario has been discounted for LACW and this approach rejected. The approach to C&amp;I forecasting has not changed between the Revised</p>



Policy	Alternative Explored in Plan Making Process	Reason for Rejection
		<p>Preferred Approach (2015) stage Plan and the Pre-Submission Plan.</p> <p>Regarding inert waste, the Revised Preferred Approach (2015) approach to deriving a baseline figure for arisings looked at 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. The Pre-Submission Plan relies on a different approach to calculate the baseline figure, the largest difference being the assumptions around how waste has been dealt at intermediate facilities. The key difference between the Revised Preferred Approach (2015) and the Pre-Submission Plan forecasting methodology is that the latter assumes a default growth scenario of zero, as suggested in the waste chapter of Planning Practice Guidance, as 'Waste planning authorities should start from the basis that net arisings of construction and demolition waste will remain constant over time'. This reflects the wide fluctuations in CDEW (inert waste) arisings which occur from year to year as construction projects commence and complete. There is no reason to suggest that the situation in the Plan Area is any different and therefore a zero growth rate, as recommended by PPG, has been applied, and the Revised Preferred Approach (2015) approach rejected.</p>
	<p>Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015) - USING THE PREFERRED METHODOLOGY - Alternative 2A: CD&amp;E - the best case scenario, reflecting a maximum recycling efficiency estimate.</p>	<p>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.</p>
	<p>Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015) - USING THE PREFERRED METHODOLOGY - Alternative 2B: CD&amp;E - the worst case scenario</p>	<p>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</p>



Policy	Alternative Explored in Plan Making Process	Reason for Rejection
	reflecting the capacity of existing facilities only.	individual sites. For these reasons, the alternative was rejected.
	Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015) - USING THE PREFERRED METHODOLOGY - Alternative 3: (C&I) - a scenario that factors in local arising estimations only	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 Preferred 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.
	Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015) - FOR C&I WASTES FORECASTING METHODOLOGIES - Alternative 1: East of England Regional Assembly – National study into commercial and industrial waste arisings 2006/07, 2009, ADAS (Estimates C&I waste arisings on the basis of the number of companies in each standard industrial classification sector for each Region).	The alternative was considered to be stretching grossing methodology too far. The study, and the data used is now old and its uses are for comparison only. As such this alternative was rejected.
	Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015) - FOR C&I WASTES FORECASTING METHODOLOGIES - Alternative 2: Detailed Assessment of East of England Waste Arisings, East of England Regional Assembly, 2009 (broad picture of waste arisings in the East of England, using WasteDataFlow, Environment Agency's Regis Appended Tonnage System [RATS] database and Hazardous Waste Interrogator).	This alternative would have limited use due to a lack of capacity data across the range of the exempt sites data supplied. As such it would not be possible to perform a statistically valid survey of exempt sites within the region, and therefore it is not possible to gross this data up to take account of sites which were not surveyed or refused to take part.
	Essex County Council and Southend-on-Sea Borough Council Replacement	Although this alternative has some use in checking derived data, it was considered that there



Policy	Alternative Explored in Plan Making Process	Reason for Rejection
	<p>Waste Local Plan: Revised Preferred Approach (2015) - FOR C&amp;I WASTES FORECASTING METHODOLOGIES - Alternative 3: Commercial and Industrial Waste in the UK and Republic of Ireland, CIWM, 2013 (this study uses the breakdown of employees by sector from the Business Register Employment Survey 2009, estimating the tonnage of waste generated per employee for each sector grouping).</p>	<p>are significant gaps. The alternative does not account for C&amp;I waste which may go through exempt sites. The quality and quantity of data on waste leaving sites is also less than that received, due to the fact that not all operators provide detailed information. As a result it is likely that not all waste that passes through one site to another is captured and therefore the overall waste managed figure is likely to be an overestimation. For these reasons this alternative was rejected.</p>
	<p>Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015) - FOR C&amp;I WASTES FORECASTING METHODOLOGIES - Alternative 4: New Methodology to Estimate Waste Generation by the Commercial and Industrial Sector in England, Defra, 2014 (the overall approach involves a review of available data sources. The alternative methodologies within this respond to an arisings/survey based approach and a deposit/returns based approach).</p>	<p>This alternative has been considered not robust, with too many un-evidenced assumptions with the revised estimate for 2009 being 21% less than that derived using waste surveys. The significant number of un-evidenced assumptions made to estimate gaps in data, especially regarding waste treated/transferred by operators under exemptions, ensured that this alternative was rejected.</p>
	<p>Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015) - FOR C&amp;I WASTES FORECASTING METHODOLOGIES - Alternative 5: Northern Ireland Commercial &amp; Industrial (C&amp;I) Waste Estimates, 2011 (the methodology used applies factors [waste per business] derived from the recently-published Defra study covering England: C&amp;I waste survey 2009).</p>	<p>The alternative uses a C&amp;I survey remodelling approach from the data collected in the Defra 2009 C&amp;I study. The methodology would not be able relevant to the waste data collected from English businesses as it does not factor in the differences between Northern Ireland and England's business sectors. Results for waste management routes are not as robust due to differences in management options available in Northern Ireland in comparison with England and for this reason the alternative was rejected.</p>
	<p>Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015) -FOR C&amp;I WASTES FORECASTING METHODOLOGIES - Alternative 6: 2011 Waste Data Quality Report, SEPA/Natural Scotland, 2013 (the method used to estimate Scottish</p>	<p>A broader dataset is collected by SEPA in Scotland compared to England; data not directly transferable. It should also be noted that waste produced by a business in Scotland that is exported directly and does not pass through a Scottish waste management site will not be captured in the dataset. The scale of this missing data is not currently known. For these</p>



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	<p>commercial and industrial waste arisings for 2011 is based on the use of SEPA regulatory data. It uses data from licensed/permitted site returns and complex exempt activities to provide estimates of arisings by business sector).</p>	<p>reasons, this alternative was rejected.</p>
	<p>Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015) -FOR C&amp;I WASTES FORECASTING METHODOLOGIES - Alternative 7: Decoupling of Waste and Economic Indicators, WRAP, 2012 (this research investigated trends of household, commercial, industrial, and construction and demolition waste arisings and key economic indicators in England, Scotland, Wales and Northern Ireland to see where decoupling has occurred).</p>	<p>The lack of data for C&amp;I and C&amp;D wastes in this methodology means that it would not be possible to derive any reliable conclusions on the relationship between waste and the economic performance of the sectors. There is evidence that waste prevention measures such as economic instruments, co-operation and information are effective in decoupling waste from economic drivers, but the evidence does not allow conclusions to be drawn on which measure or combination of measures is most effective; this will depend on an individual context, waste stream and sector. For this reason, the alternative was rejected.</p>
	<p>Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015) -FOR CD&amp;E WASTES FORECASTING METHODOLOGIES - Alternative 1: East of England Construction and Demolition Waste Arisings – Final report, Aug 2009 (this approach was to develop a set of performance indicators based on waste arisings data from completed construction projects from BRE's SMARTWaste Plan and SMARTStart tools).</p>	<p>Potential double counting in excavation waste as the plan tool did not specify construction waste only, and so some may have included excavation waste. Could provide a specific estimate for each county / unitary authority (within East of England) for 2008 for all waste streams other than excavation. There are significant variations in some figures, including between mean and median – mean has been assumed to be representative of typical projects and the median would be representative of projects operating at good practice. The methodology also does not attempt to quantify waste from exempt activities. For these reasons, and due to the data being old, the alternative was rejected.</p>
	<p>Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015) -FOR CD&amp;E WASTES FORECASTING METHODOLOGIES - Alternative 2: Study into Waste handled at Exempt Sites, East of England Waste Technical Advisory Body, March 2012 (this report explores the different data sources that exist and analyses the information</p>	<p>This piecemeal approach is considered insufficiently complete to provide a clear picture. Some level of response was received from a third of waste management and haulage companies. Many of these were unable or reluctant to provide detailed information on the quantity and origin of material that they handled. Most companies do not explicitly operate in the East of England, and therefore had difficulty in identifying the quantity or percentage of their work that</p>



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	<p>from a telephone survey of companies operating in the East of England, including those operating mobile crushing equipment. Using this information, together with data from the Environment Agency, other national surveys and site waste management plans, the report attempts to assess the quantities that might be arising in the East of England).</p>	<p>was based in the East of England. SWMPs showed great variation in the quantities of waste arising from different projects, even when they are projects of the same type. New build projects were considered to be more consistent in the quantities of waste generated, but the extent of the variation was still too large to provide a meaningful standard level of arisings, either by quantity of built floor space or by the value of the project. For these reasons, in addition to a low participation rate, this alternative was rejected.</p>
	<p>Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015) - FOR CD&amp;E WASTES FORECASTING METHODOLOGIES - Alternative 3: Survey of Arisings and Use of Alternatives to Primary Aggregates in England, 2005 Construction, Demolition and Excavation Waste, DCLG, 2007 (two surveys were carried out during the spring and early summer of 2006, backed up by a programme of other data analysis, to establish estimates for the arisings and use as aggregate of construction and demolition waste [CDEW] in England in 2005).</p>	<p>This alternative was rejected as the survey response rates were insufficient to presume any regional or sub-regional focus. As such, the data is not considered accurate. The alternative was also rejected as the data is considered old and did not cover non-inert CDEW.</p>
	<p>Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015) -FOR CD&amp;E WASTES FORECASTING METHODOLOGIES - Alternative 4: Construction, demolition and excavation waste arisings, use and disposal for England, WRAP, 2008 - Update on the 2007 DCLG survey (this approach was to run a limited survey; draw on information collected from its members by the National Federation of Demolition Contractors to provide a 'second opinion' on the state of the sector; make maximum use of data collected by the Environment Agency; collect targeted information from operators of waste treatment and transfer facilities; and run a formal survey of selected landfill operators).</p>	<p>This alternative involves the grossing up of the data from 80 respondents into a national picture. This was not considered fully representative of the national population of aggregate recyclers and was perhaps more indicative of those facilities that are in urban areas. As such, re-weighting was required before extrapolation which shows a degree of unreliability in the data received from surveys. There is also a considerable degree of inter facility movement which was maybe double counted. The alternative also does not provide a regional breakdown and for all the above reasons the alternative was rejected.</p>



Policy	Alternative Explored in Plan Making Process	Reason for Rejection
	<p>Essex County Council &amp; Southend-on-Sea Borough Council Replacement Waste Local Plan: Pre-Submission (2016)</p>	<p>At the Revised Preferred Approach (2015) stage forecasting for non-hazardous organic waste (for biological treatment [this waste stream is a combination of the Local Authority Collected Waste (LACW) stream and the commercial and industrial (C&amp;I) waste stream]) looked at (for C&amp;I wastes) local arising estimations plus Greater London Local Plan arising estimations, and (for LACW) data supplied by local authorities. Regarding the LACW waste stream, the Revised Preferred Approach (2015) looked at a scenario of 0% annual growth in waste arisings over the Plan period due to population increases being offset by existing and planned future minimisation measures. This approach was based on the levels of recycling and composting of household waste as set out in Waste Strategy for England 2007 and presented in the adopted 2008 Joint Municipal Waste Management Strategy (JMWMS). The new forecasting methodology used for the Pre-Submission Plan instead assumes the growth rates applied in the national Defra central forecast (0.2% per annum) to the Baseline Projection and extrapolates that forward to the end of the Plan period. This is more in line with, and follows the guidance of the PPG, which requires a level of growth to be considered and added flexibility within the Plan. As a result the 0% annual growth scenario has been discounted for LACW. The approach to C&amp;I forecasting has not changed between the Revised Preferred Approach (2015) stage Plan and the Pre-Submission Plan.</p> <p>Regarding inert waste, the Revised Preferred Approach (2015) approach to deriving a baseline figure for arisings looked at 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. The Pre-Submission Plan relies on a different approach to calculate the baseline figure, the largest difference being the assumptions around how waste has been dealt at intermediate facilities. The key difference between the Revised Preferred Approach (2015) and the Pre-Submission Plan forecasting methodology is that the latter assumes a default growth scenario of zero, as suggested in the waste chapter of Planning Practice Guidance, as 'Waste planning authorities should start from the basis that net arisings of construction and demolition</p>





Policy	Alternative Explored in Plan Making Process	Reason for Rejection
		<p>waste will remain constant over time'. This reflects the wide fluctuations in CDEW (inert waste) arisings which occur from year to year as construction projects commence and complete. There is no reason to suggest that the situation in the Plan Area is any different and therefore a zero growth rate, as recommended by PPG, has been applied. The most recent arisings data available (2014) indicates that this should be projected at 3.311mtpa throughout the plan period. Comparison between this figure and current consented recycling capacity capable of processing this waste stream (at 2.118mtpa) shows an immediate shortfall of 1.5mtpa. This is reflected in Policy 1 as the shortfall for inert waste.</p> <p>Other Waste Management – At the Revised Preferred Approach (2015) stage, there was no figure for this amount and specific provision for it was not made on the basis that the exact destination would be determined through market forces. This has not changed, however the assumption in the RPA (2015) that it could continue to be sent to landfill within the Plan Area does not accord with the Waste Hierarchy and self-sufficiency, therefore specific provision for a waste management facility to deal with this residue has been made within the Pre-Submission document.</p> <p>Hazardous Waste - At the RPA (2015) stage, the preferred approach to stable non-reactive hazardous waste arisings over the Plan period was to use those data returns published by the Environment Agency within their annual Hazardous Waste Interrogator, which looks at hazardous waste movements when they 'change hands' between producers and disposal / treatment facilities. The quality of this data was, and is, considered good due to the nature of the waste. Despite this, the Revised Preferred Approach (2015) did not factor in the figures from the Waste Data Interrogator (which additionally captures all hazardous waste movements) , or the EA Pollution Inventory (which also crucially captures hazardous waste arising from certain waste management facilities such as landfills and Energy from Waste plants). It should also be noted that the Revised Preferred Approach (2015) approach assumed that hazardous waste management facilities within the Plan Area merely resulted in the transfer of waste</p>



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		<p>elsewhere. The Pre-Submission Plan also uses the Environment Agency's Hazardous Waste Interrogator, although additionally also the Waste Data Interrogator and the EA Pollution Inventory in order to get a more accurate figure. There has also been a more sophisticated analysis of inputs and outputs from principal Plan Area facilities managing hazardous waste. Regardless of this change in methodology, a similar shortfall in capacity has been highlighted.</p>
<p>Policy 2 – Safeguarding Waste Management Facilities</p>	<p>Essex County Council and Southend-on-Sea Borough Council Joint Waste Development Document: Issues and Options (2010). Re-explored in the Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015) as SAFEGUARDING - Alternative 1.</p> <p>SAFEGUARDING Option 1 - Existing waste management sites will only be safeguarded where they are consistent with policies in the WDD and have a permanent planning permission. If such sites are not consistent with the strategy, alternative uses may be acceptable. This would require alternative sites for waste management to be secured in appropriate locations, to ensure there is no net loss of existing waste management capacity within the Plan Area.</p>	<p>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.</p>
	<p>Essex County Council and Southend-on-Sea Borough Council Joint Waste Development Document: Issues and Options (2010). Re-explored in the Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015) as SAFEGUARDING - Alternative 2 (size threshold) and Alternative 3 (throughput threshold).</p> <p>SAFEGUARDING Option 2 - Existing waste management facilities and sites allocated in the Plan will only be safeguarded where they are consistent with policies in the WDD and provide for a substantial proportion of existing waste</p>	<p>Singularly, an approach to safeguard sites of a particular size threshold (e.g. 2 hectares) 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. This is also the case for sites above a certain throughput (e.g. 1000,000tpa).</p>



Policy	Alternative Explored in Plan Making Process	Reason for Rejection
	<p>management capacity. This may result in safeguarding sites above a particular size threshold, e.g. 2 hectares or facilities above a certain throughput e.g. 100,000 tonnes per annum, or the strategic facilities as defined in the previous Chapter, to recognize their strategic importance. The size threshold may need to vary depending on the type of facility. If such sites do not meet these criteria, alternative uses may be acceptable. This would require alternative sites for waste management facilities to be secured in appropriate locations, to ensure there is no net loss of existing waste management capacity within the Plan Area.</p>	
	<p>Essex County Council and Southend-on-Sea Borough Council Joint Waste Development Document: Issues and Options (2010).</p> <p>WASTE CONSULTATION ZONES Option 1 - Waste Consultation Zones should be established around waste facilities that are considered to be central to the delivery of the WDD (i.e. strategic facilities).</p>	<p>This option has been progressed and selected as part of the Pre-Submission approach to safeguarding and Waste Consultation Zones (now Waste Consultation Areas) so as not to prevent or unreasonably restrict the use of the safeguarded site for waste management purposes.</p>
	<p>Essex County Council and Southend-on-Sea Borough Council Joint Waste Development Document: Issues and Options (2010). Re-explored in the Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015) as WASTE CONSULTATION ZONES - Alternative 1.</p> <p>WASTE CONSULTATION ZONES Option 2 - To only safeguard those types of waste facilities which have greater potential for adverse effects on people and the environment (Waste Consultation Zones should apply only to certain types of waste facility that have greater potential for adverse effects on people and the environment e.g. landfill, WwTWs, energy from waste and hazardous waste</p>	<p>The alternative approach does not conform to the requirements of the WPA or the remit of the Plan. As such this approach was rejected.</p>



Policy	Alternative Explored in Plan Making Process	Reason for Rejection
	<p>facilities.)</p> <p>Essex County Council and Southend-on-Sea Borough Council Joint Waste Development Document: Issues and Options (2010) Re-explored in the Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015) as WASTE CONSULTATION ZONES - Alternative 2.</p> <p>WASTE CONSULTATION ZONES Option 3 - 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.</p>	<p>The determination of WCZs by district level LPAs would not have positive impacts for the sustainable management of waste in the Plan Area. The notion is also not compatible with the requirements of the NPPF and is beyond the remit of LPAs. For these reasons the approach was rejected.</p>
	<p>Essex County Council and Southend-on-Sea Borough Council Joint Waste Development Document: Issues and Options (2010) Re-explored in the Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015) as WASTE CONSULTATION ZONES - Alternative 3.</p> <p>WASTE CONSULTATION ZONES Option 4 - Waste Consultation Zones should be established around all waste management facilities.</p>	<p>This approach has largely been progressed to the Pre-Submission stage, with the additional possible exemption of non-specialist, small scale waste operations, defined in the Plan as those with an annual capacity of 10,000 tpa or less. As such, this option has been progressed to the Pre-Submission stage and selected.</p>
	<p>Essex County Council and Southend-on-Sea Borough Council Joint Waste Development Document: Preferred Approach (2011) – Preferred Approach Safeguarding (summary of approach)</p> <p>The WPAs will seek to safeguard a number of strategic sites essential for delivery of the WDD (including three IWMFs) in accordance with the life of their planning</p>	<p>The 2011 Preferred Approach reflected a hybrid of the options explored at the Issues and Options stage, and specified that the WPAs will seek to safeguard a number of strategic sites, including three IWMFs at Stanway, Rivenhall Airfield and Courtauld Road (Basildon), which are all licensed, operating waste facilities or have planning permission or are allocated in the WDD. No size threshold was determined within which sites will be safeguarded. The 2011 Preferred Approach is generally similar to the Pre-Submission approach to safeguarding and Waste</p>



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	<p>permission which are all licensed, operating waste facilities; or sites that have planning permission extending beyond the plan period, but are not currently operational; or sites with recent permissions or permissions granted subject to legal agreements; or sites allocated in the WDD. Additional sites essential for delivery of the Joint Municipal Waste Management Strategy (MWMS) will also be safeguarded.</p> <p>Waste Consultation Zones (summary of approach)</p> <p>Within the two tier area of the plan, where planning applications for uses other than waste management activities (excluding minor householder applications) are proposed within or around a 250m consultation zone of the safeguarded sites, the relevant Local Planning Authority will be required to consult the Waste Planning Authority on the planning application. The application will need to demonstrate that the proposal would not prevent or unreasonably restrict the use of the safeguarded site for waste management purposes.</p>	<p>Consultation Zones. As such the 2011 Preferred Approach is not distinctly different to be considered a reasonable alternative approach to be re-explored.</p>
	<p>Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015) – Preferred Approach (summarised)</p> <p>To safeguard the following sites: A. Strategic Sites Essential for the Delivery of the RWLP; B. Non-Strategic Site Allocations Made in the RWLP; (and) C. Waste Transfer Stations Essential for Delivery of the Joint Municipal Waste Management Strategy. The network of Local Authority Collected Waste facilities comprising the Integrated Waste Management Facility at Tovi EcoPark, Basildon and supporting transfer stations are to be safeguarded for the life of the planning permission or unless it can be demonstrated that they are no longer required for the delivery of</p>	<p>The 2015 Revised Preferred Approach safeguards existing sites hosting facilities deemed strategic and which are already making a significant contribution to current waste management in the Plan Area are safeguarded to ensure their future use for waste management.</p> <p>Safeguarding implemented through Waste Consultation Zones reduces the risk that waste management sites allocated in the Local Plan may be subject to a change of use during the Plan period, which would lead to a loss in the overall waste management capacity planned for the Plan Area. Such a loss would mean that the Local Plan is no longer making sufficient provision for its identified waste need. In addition, the 2015 Revised Preferred Approach included added content regarding the role of monitoring to aid flexibility. Since the Revised Preferred Approach 2015 consultation, the Plan's approach to safeguarding and Waste Consultation Zones has changed in terms of how the policy is presented, although the notion</p>



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	<p>the Joint Municipal Waste Management Strategy. As part of the annual monitoring process, the safeguarding of these sites will be re-assessed to determine if they are still necessary in terms of meeting the strategy or whether a more suitable site has become available.</p> <p>D. Waste Consultation Zones - Where planning applications for uses other than waste management activities (excluding those defined Appendix D) are proposed within a 250m consultation zone of the safeguarded sites, the relevant Local Planning Authority will be required to consult the Waste Planning Authority on the planning application. The application will need to demonstrate that the proposal would not prevent or unreasonably restrict the use of the safeguarded site for waste management purposes. In consultation with the relevant Local Planning Authority, this distance of 250m may be expanded or reduced depending on the specific nature of the site.</p> <p>E. Monitoring - An indicator will be added to the monitoring framework to ensure that any changes to safeguarding provisions made due to the expiration of planning permission, the delivery of a non-strategic facility or the closure of a strategic facility are reported annually.</p>	<p>presented in the Revised Preferred Approach has largely been progressed for selection at the Pre-Submission stage.</p>
	<p>Essex County Council &amp; Southend-on-Sea Borough Council Replacement Waste Local Plan: Pre-Submission (2016)</p>	<p>It should be noted that the safeguarding element of the previous Revised Preferred Approach RWLP 2015 regarding safeguarding and Waste Consultation Zones (now Waste Consultation Areas to reflect appropriate terminology) has now been moved to the supporting text for this corresponding Policy in the Pre-Submission RWLP. This is not considered a significant change in approach and will not lead to any direct subsequent change in sustainability impacts as previously specified in the Sustainability Appraisal of the Revised Preferred Approach RWLP 2015. The Pre-Submission RWLP has used the plan-making process (evidence base and site selection methodology) to allocate sites and then safeguard them through WCAs as a policy</p>



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		<p>vehicle.</p> <p>A noticeable change from the Revised Preferred Approach (2015) is the removal of text that specified that regarding consultation with the relevant Local Planning Authority, the distance of 250m may be expanded or reduced depending on the specific nature of the site. Although this appears a significant omission from the Policy, words to a similar effect appear in the supporting text, which specifies that '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.' In terms of the sustainability of this approach, there will be no significant change in the impacts presented in this Pre-Submission approach from those identified in the SA of the Revised Preferred Approach (2015); the difference is not considered to be distinct or give rise to any change of approach resulting from the implementation of the Policy. In addition, neither can the difference in Policy wording be considered distinct enough to be deemed a reasonably alternative approach for the purposes of the Sustainability Appraisal. For the purposes of a more focused Policy wording, the Pre-Submission approach has been selected in addition to many of the elements of the preceding Revised Preferred Approach (2015) regarding safeguarding and Waste Consultation Zones.</p>
Policy 4 – Areas of Search	Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015) – Preferred Approach (to designate Areas of Search around suitable B2 [General Industry] and / or B8 [Storage or Distribution] land as defined in the Local Plans of the districts, boroughs and City in the Plan area)	As well as the identification and allocation of Strategic scale facilities, the Plan is also required to provide additional flexibility and to cater for possible non-strategic waste requirements (arising locally) and the preferred approach is to identify Areas of Search alongside criteria that adhere to notions of sustainability in-keeping with similar types of development. The exploration of Areas of Search has only been deemed necessary as a result of national requirements, the NPPF and the need for flexibility to respond to growth in the Plan Area (in response to district / borough OAN requirements). As such, the notion has only been explored at this stage, as the first in the WLP's progression since OAN requirements.



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	<p>Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015) – Alternative 1: To not identify suitable B2 (General Industry) and / or B8 (Storage or Distribution) land for the consideration of waste management facilities</p>	<p>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.</p>
	<p>Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015) – Alternative 2: To expand the area of search to employment areas beyond B2 and B8 use classes.</p>	<p>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.</p>
	<p>Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015) – Alternative 3: To safeguard portions / units of identified suitable areas</p>	<p>This alternative could not be considered viable, as the potential of a specific proposal coming forward from within any such area has not been demonstrated by interested landowners or developers. As such the alternative was rejected.</p>
	<p>Essex County Council &amp; Southend-on-Sea Borough Council Replacement Waste Local Plan: Pre-Submission (2016)</p>	<p>The intention is for the 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. For this reason the approach to Areas of Search has been selected. Qualifying sites have been selected in line with the assessment methodology, which has been deemed the most sustainable approach in light of all reasonable alternatives explored at the revised Preferred Approach stage (2015).</p>





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<p>Policy 5 – Enclosed Waste Facilities</p>	<p>Essex County Council and Southend-on-Sea Borough Council Joint Waste Development Document: Issues and Options (2010) – Locational Criteria (for specific facility types)</p> <ul style="list-style-type: none"> <li>- Industrial sites used for general industry, storage and distribution (MRF, IVC, AD, MBT, Autoclaving, energy recovery facilities, Gasification and Pyrolysis)</li> <li>- Industrial estates close to waste arisings and used for general industry, storage and distribution. (Waste Transfer Stations only)</li> <li>- Industrial estates close to waste arisings and used for light industry and offices. (Waste Transfer Stations only)</li> <li>- Brownfield sites in urban areas (MRF, IVC, AD, MBT, Autoclaving, energy recovery facilities, Gasification and Pyrolysis)</li> <li>- Brownfield sites in rural areas (Waste Transfer Stations, MRF, IVC, AD, MBT, Autoclaving, energy recovery facilities, Gasification and Pyrolysis)</li> <li>- Redundant farm buildings (Waste Transfer Stations, MRF, IVC, AD, MBT, Autoclaving, energy recovery facilities, Gasification and Pyrolysis)</li> <li>- Co-located with existing waste facilities (Waste Transfer Stations, MRF, IVC, AD, MBT, Autoclaving, energy recovery facilities, Gasification and Pyrolysis)</li> <li>- Mineral working and landfill sites (Waste Transfer Stations, MRF, IVC, AD, MBT, Autoclaving, energy recovery facilities, Gasification and Pyrolysis)</li> <li>- Open countryside (Waste Transfer Stations, MRF, IVC, AD, MBT, Autoclaving, energy recovery facilities, Gasification and Pyrolysis)</li> </ul>	<p>The SA of the Issues and Options stage (2010) highlighted the various impacts of each specific facility at each location for the purposes of identifying the most sustainable options. As an alternative, the identification of preferred locations for specific facility types has since been rejected in favour of preferred locations for enclosed waste facilities; open air waste facilities; intermediate, low and very low radioactive waste facilities; and landfill.</p> <p>The sustainability impacts of this alternative approach are not significantly different from the Pre-Submission approach. Grouping facility types under the categories of enclosed facilities, open air facilities, radioactive facilities and landfill however can be considered a more flexible approach. Identifying locations for each specific facility type could be considered restrictive, limiting certain facilities to specific types of site without consideration of possible mitigation measures (in light of the Plan's policy content) and also possibly affecting the viability of proposals.</p> <p>The Pre-Submission Approach instead seeks to direct facilities to broadly acceptable locations with a larger scope for their consideration on their own merits. For these reasons this alternative has since been rejected.</p>
	<p>Essex County Council and Southend-on-Sea Borough Council Joint Waste</p>	<p>The SA of the Preferred Options stage (2011) highlighted the various impacts of each specific</p>



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	<p>Development Document: Preferred Approach (2011) – Locational Criteria (for specific facility types)</p> <p>Recycling and Recovery Facilities - within existing industrial estates used for general industry (B2), storage and distribution (B8) or land allocated as such in an adopted local plan or LDF document; within existing waste management sites or in association with other waste management development; within those employment areas (existing or allocated) not categorised by Use Class B2 or B8; within areas of degraded, contaminated or derelict land.</p> <p>Materials Recycling/Recovery Facilities and Waste Transfer Stations - within existing industrial estates used for general industry (B2), storage and distribution (B8) or land allocated as such in an adopted local plan or LDF document; within existing waste management sites or in association with other waste management development; within those employment areas (existing or allocated) not categorised by Use Class B2 or B8; within areas of degraded, contaminated or derelict land; small scale facilities may be accommodated at current landfill sites, provided they do not prejudice the agreed restoration timescale for the site and the new use ceases prior to the permitted completion date of the site.</p> <p>In-vessel Composting Facilities - within existing industrial estates used for general industry (B2), storage and distribution (B8) or land allocated as such in an adopted local plan or LDF document; within existing waste management sites or in association with other waste management development including Waste Water Treatment Works; on existing areas of hardstanding and/or degraded, contaminated or derelict land and previously developed land in rural areas; within redundant farm land and buildings.</p> <p>Clinical Waste Treatment Facilities - within existing industrial estates used for</p>	<p>facility at each location in accordance with an approach progressed and developed from the Issues and Options stage consultation. As an alternative, the identification of preferred locations for specific facility types has since been rejected in favour of preferred locations for enclosed waste facilities; open air waste facilities; intermediate, low and very low radioactive waste facilities; and landfill.</p> <p>The sustainability impacts of this alternative approach are not significantly different from the Pre-Submission approach. Grouping facility types under the categories of enclosed facilities, open air facilities, radioactive facilities and landfill however can be considered a more flexible approach. Identifying locations for each specific facility type could be considered restrictive, limiting certain facilities to specific types of site without consideration of possible mitigation measures (in light of the Plan's policy content) and also possibly affecting the viability of proposals. Additionally it was deemed difficult to determine, and also assess, specific locational criteria for those facilities that could be suitable in a number of different types of location. Certain types of inert waste recycling facilities for instance could be compatible as an enclosed or open air facility. Similarly inert recycling facilities could be classified as enclosed or open air in theory, and dependant on the specific proposal would have widely differing locational criteria.</p> <p>The Pre-Submission Approach instead seeks to direct facilities to broadly acceptable locations with a larger scope for their consideration on their own merits. For these reasons this alternative has since been rejected.</p>



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	<p>general industry (B2), storage and distribution (B8) or land allocated as such in an adopted local plan or LDF document; within existing waste management sites or in association with other waste management development; within areas of degraded, contaminated or derelict land; as part of a hospital complex.</p> <p>Mechanical Biological Treatment, Autoclaving and Anaerobic Digestion Facilities - within the IWMF sites which are safeguarded and allocated; within existing industrial estates used for general industry (B2), storage and distribution (B8) or land allocated as such in an adopted local plan or LDF document; within existing waste management sites or in association with other waste management development; within areas of degraded, contaminated or derelict land; as part of district heating schemes (AD, Autoclaving, and MBT with CHP output only); in association with Waste Water Treatment Works (AD only); in agricultural locations and farms (AD only).</p> <p>Energy from Waste, Gasification and Pyrolysis Facilities - within the IWMF sites which are safeguarded and allocated; within existing industrial estates used for general industry (B2), storage and distribution (B8) or land allocated as such in an adopted local plan or LDF document; within existing waste management sites or in association with other waste management development; within areas of degraded, contaminated or derelict land; as part of district heating schemes; co-located with other commercial and industrial users of heat and power.</p>	
	<p>Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015)</p> <p>Subject to satisfying the other policies included within the Plan, the Preferred Approach is to support proposals for new enclosed waste management facilities at</p>	<p>The Revised Preferred Approach to enclosed waste facilities is a similar approach to that of the Pre-Submission policy. As such, the highlighted sustainability impacts are also similar. The Revised Preferred Approach however reiterates other elements of the Plan regarding the status of allocated sites and the Areas of Search, which can be seen to detract from the purpose of the policy. As such, the numbered parts of the Revised Preferred Approach have been omitted</p>



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	<p>the following locations:</p> <ol style="list-style-type: none"> <li>1. Firstly, on preferred sites, allocated for that purpose or, where justification that a preferred site is not suitable;</li> <li>2. Secondly, within the Areas of Search.</li> </ol> <p>Where proposals demonstrate that they cannot be delivered as above, they will be supported on the following land use types, as follows:</p> <ul style="list-style-type: none"> <li>- On other existing industrial estates outside of Areas of Search, used for general industry (B2), storage and distribution (B8) or land allocated as such in an adopted Local Plan;</li> <li>- On existing permitted waste management sites or co-located in association with other waste management development (including Waste Water Treatment Works in the case of biological treatment facilities);</li> <li>- On existing areas of hardstanding and / or degraded, contaminated or derelict land;</li> <li>- Within redundant farm land and buildings (in the case of in-vessel composting);</li> <li>- As part of a hospital complex in the case of clinical waste treatment facilities.</li> <li>- Where it can be demonstrated that heat can be supplied to a district heat network or direct to commercial or industrial users of heat (for energy recovery facilities with combined heat and power (CHP))</li> </ul> <p>Subject to meeting the locational criteria above, facilities which enable the provision of energy from waste should meet the following additional criteria:</p> <ul style="list-style-type: none"> <li>- For energy recovery facilities with combined heat and power: it should be demonstrated that heat can be supplied to a district heat network or direct to</li> </ul>	<p>in favour of the Pre-Submission Policy approach of specifying under what circumstances proposals outside allocations and Areas of Search would be favoured; those being predominantly regarding any changes to the availability and suitability status of allocated sites / those in Areas of Search, or where need for additional capacity can be demonstrated. In general this is a more flexible approach, and for that reason these discussed elements of the Revised Preferred Approach have been rejected for the Pre-Submission Policy stance.</p>



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	<p>commercial or industrial users of heat;</p> <ul style="list-style-type: none"> <li>- For anaerobic digestion: it should be demonstrated that there will be 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;</li> <li>- For advanced thermal treatment: it should be demonstrated that syngas is to be converted for use as a fuel</li> <li>- For Mechanical Heat Treatment or Mechanical Biological Treatment: it should be demonstrated that the facility can supply the heat produced as part of the process to a district heating scheme.</li> </ul> <p>Whilst there will be a policy preference made to those sites which come forward on land uses according with those above, every proposal that comes forward will be assessed on their individual merits, based on the policies in the adopted RWLP and through the wider planning application process.</p>	
	<p>Essex County Council &amp; Southend-on-Sea Borough Council Replacement Waste Local Plan: Pre-Submission (2016)</p>	<p>The Policy differs slightly from the Revised Preferred Approach (2015) to enclosed waste facilities. The Revised Preferred Approach reiterated other elements of the Plan regarding the status of allocated sites and the Areas of Search being supported in the first instance, which can be seen to detract from the purpose of the policy. As such, the Pre-Submission Policy approach specifies under what circumstances proposals outside allocations and Areas of Search would be favoured; those being predominantly regarding any changes to the availability and suitability status of allocated sites / those in Areas of Search, or where need for additional capacity can be demonstrated. In general this is a more flexible approach, and for that reason these discussed elements of the Revised Preferred Approach have been rejected for the Pre-Submission Policy stance.</p>



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Policy 6 – Open Waste Facilities	<p>Essex County Council and Southend-on-Sea Borough Council Joint Waste Development Document: Issues and Options (2010) – Locational Criteria (for specific facility types)</p> <ul style="list-style-type: none"> <li>- Industrial estates close to waste arisings and used for general industry, storage and distribution. (Waste Transfer Stations only)</li> <li>- Industrial estates close to waste arisings and used for light industry and offices. (Waste Transfer Stations only)</li> <li>- Industrial sites used for general industry, storage and distribution (Waste Transfer Stations, MRF, OWC, C&amp;D Recycling)</li> <li>- Brownfield sites in urban areas (Waste Transfer Stations, MRF, C&amp;D Recycling)</li> <li>- Brownfield sites in rural areas (Waste Transfer Stations, MRF, C&amp;D Recycling)</li> <li>- Redundant farm buildings (Waste Transfer Stations, MRF)</li> <li>- Co-located with existing waste facilities (Waste Transfer Stations, MRF, C&amp;D Recycling)</li> <li>- Mineral working and landfill sites (Waste Transfer Stations, MRF, C&amp;D Recycling)</li> <li>- Open countryside (Waste Transfer Stations, MRF, C&amp;D Recycling)</li> <li>- On development sites on a temporary basis (C&amp;D Recycling only)</li> </ul>	<p>The SA of the Issues and Options stage (2010) highlighted the various impacts of each specific facility at each location for the purposes of identifying the most sustainable options. As an alternative, the identification of preferred locations for specific facility types has since been rejected in favour of preferred locations for enclosed waste facilities; open air waste facilities; intermediate, low and very low radioactive waste facilities; and landfill.</p> <p>The Plan's requirement for flexibility, the NPPF's presumption in favour of sustainable development, the need to assess sites on their own merits, and also the need for specific sites in response to the evidence base ensure that a single Preferred Approach for open (air) facilities is appropriate. It should be noted that the broad impacts and requirements of different open air facilities are similar in the context of the Plan. Criteria should be, and has been designed within the Plan's policy content to minimise impacts and eliminate these in the first instance. For this reason different open air facilities share a lot in common and a single Preferred Approach is considered appropriate in regards to the Plan's aims and objectives. For these reasons the alternative approach has been rejected.</p>
	<p>Essex County Council and Southend-on-Sea Borough Council Joint Waste Development Document: Preferred Approach (2011) - Locational Criteria (for specific facility types)</p> <ul style="list-style-type: none"> <li>- Inert Waste Recycling Facilities - within the IMWF sites safeguarded and</li> </ul>	<p>The SA of the Preferred Options stage (2011) highlighted the various impacts of each specific facility at each location in accordance with an approach progressed and developed from the Issues and Options stage consultation. As an alternative, the identification of preferred locations for specific facility types has since been rejected in favour of preferred locations for</p>



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	<p>allocated; within existing industrial estates used for general industry (B2), storage and distribution (B8) or land allocated as such in an adopted local plan or LDF document; within existing waste management sites or in association with other waste management development; within areas of degraded, contaminated or derelict land; at current mineral working and landfill sites, provided they do not prejudice the agreed restoration timescale for the site and the new use ceases prior to the permitted completion date of the site; at demolition and construction sites where the inert waste materials are to be used in the construction project on that site.</p> <p>- Outdoor Composting Facilities - on existing areas of hardstanding and/or degraded, contaminated or derelict land and previously developed land in rural areas; within redundant farm land and buildings; in association with other waste management development, including Waste Water Treatment Works; where the compost is to be used as part of the restoration requirement for a mineral working and/or a reclamation process on adjoining land; at landfill sites where the compost is to be used as part of the restoration and the residual waste can be disposed of, provided the new use ceases prior to the permitted completion date of the site.</p> <p>- Waste Water Treatment Works - within existing Waste Water Treatment Works; within industrial estates used for general industry (B2), storage and distribution (B8) or land allocated as such in an adopted local plan or LDF document; within existing waste management sites or in association with other waste management development; on existing areas of hardstanding and/or degraded, contaminated or derelict land and previously developed land in rural areas; within redundant farm land and buildings.</p>	<p>enclosed waste facilities; open air waste facilities; intermediate, low and very low radioactive waste facilities; and landfill. Although the alternative is not significantly different from the Preferred Approach, the changes made can be considered a more flexible approach. The Preferred Approach (2011) as an alternative can be considered as more restrictive, limiting certain facilities to specific types of site and the Pre-Submission approach instead seeks to direct them to broadly acceptable locations and on their own merits. For these reasons the 2011 Preferred Approach has since been rejected.</p> <p>The Plan's requirement for flexibility, the NPPF's presumption in favour of sustainable development, the need to assess sites on their own merits, and also the need for specific sites in response to the evidence base ensure that a single Preferred Approach for open (air) facilities is appropriate. It should be noted that the broad impacts and requirements of different open air facilities are similar in the context of the Plan. Criteria should be, and has been designed within the Plan's policy content to minimise impacts and eliminate these in the first instance. For this reason different open air facilities share a lot in common and a single Preferred Approach is considered appropriate in regards to the Plan's aims and objectives. For these reasons the alternative approach has been rejected.</p>
	Essex County Council and Southend-on-Sea Borough Council Replacement	It should be noted that the Plan Area has enough existing waste water treatment capacity in the



Policy	Alternative Explored in Plan Making Process	Reason for Rejection
	<p>Waste Local Plan: Revised Preferred Approach (2015)</p> <p>Subject to satisfying the other policies included within the Plan, the Preferred Approach is to support proposals for open windrow composting or open waste recycling facilities and associated facilities (not including landfill operations) at the following locations: Firstly, on preferred sites, allocated for inert waste recycling facilities or open windrow composting. Where proposals demonstrate that they cannot be delivered as above, they will be supported on the following land use types, as follows: On existing industrial estates used for general industry (B2), storage and distribution (B8) or land allocated as such in an adopted Local Plan or LDF document (in the case of inert waste); On existing areas of hardstanding and/or degraded, contaminated or derelict land; On existing open waste management sites or in association with other waste management development including Waste Water Treatment Works in the case of open windrow; Mineral and landfill sites where material is used in conjunction with restoration, where the additionally proposed waste operations are temporary, linked to the completion of the mineral/landfill operation; Within redundant farm land and buildings, in the case of open windrow; and at demolition and construction sites where the inert waste materials are to be used on the construction project on that site. 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. Such locations will be considered less favourably than those set out within this Preferred Approach.</p>	<p>Plan period, and that such facilities have not been included within the Plan at the Revised Preferred Approach (2015) and Pre-Submission stages.</p> <p>The Revised Preferred Approach to open waste facilities is a similar approach to that of the Pre-Submission policy. As such, the highlighted sustainability impacts are also similar. The Revised Preferred Approach however reiterates other elements of the Plan regarding the status of allocated sites and the Areas of Search, which can be seen to detract from the purpose of the policy.</p> <p>As such, the numbered parts of the Revised Preferred Approach have been omitted in favour of the Pre-Submission Policy approach of specifying under what circumstances proposals outside allocations and Areas of Search would be favoured; those being predominantly regarding any changes to the availability and suitability status of allocated sites / those in Areas of Search, or where need for additional capacity can be demonstrated. In general this is a more flexible approach, and for that reason these discussed elements of the Revised Preferred Approach have been rejected for the Pre-Submission Policy stance.</p>
	<p>Essex County Council &amp; Southend-on-Sea Borough Council Replacement Waste Local Plan: Pre-Submission (2016)</p>	<p>It should be noted that the Plan Area has enough existing waste water treatment capacity in the Plan period, and that such facilities have not been included within the Plan at the Revised Preferred Approach (2015) and Pre-Submission stages.</p> <p>The Policy differs slightly from the Revised Preferred Approach (2015) to open waste facilities.</p>





Policy	Alternative Explored in Plan Making Process	Reason for Rejection
		<p>The Revised Preferred Approach reiterated other elements of the Plan regarding the status of allocated sites and the Areas of Search being supported in the first instance, which can be seen to detract from the purpose of the policy. As such, the Pre-Submission Policy approach specifies under what circumstances proposals outside allocations and Areas of Search would be favoured; those being predominantly regarding any changes to the availability and suitability status of allocated sites / those in Areas of Search, or where need for additional capacity can be demonstrated. In general this is a more flexible approach, and for that reason these discussed elements of the Revised Preferred Approach have been rejected for the Pre-Submission Policy stance.</p>
<p>Policy 7 – Nuclear Waste Treatment and Storage at Bradwell-on-Sea</p>	<p>Essex County Council and Southend-on-Sea Borough Council Joint Waste Development Document: Issues and Options (2010) – Suggested Policy Criteria</p> <p>The following policy criteria are suggested for the management of low level radioactive waste:</p> <ul style="list-style-type: none"> <li>- 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.</li> <li>- Assess the potential of existing non-hazardous landfill sites within the Plan Area for disposal of certain LLW and VLLW.</li> </ul> <p>Essex County Council and Southend-on-Sea Borough Council Joint Waste Development Document: Preferred Approach (2011) – General Locational Criteria</p> <p>Proposals for facilities for the treatment, storage or disposal of ILW, LLW or VLLW generated at Bradwell nuclear power station will only be acceptable within the</p>	<p>At the Issues and Options stage, it was not necessary to allocate new sites to deal with non-nuclear VLLW and as such policy criteria were explored rather than locational criteria. Since then, the Plan must set out the means by which new facilities would be assessed. This approach is flexible 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 has since been rejected.</p> <p>The consultation responses from the Issues and Options (2010) stage showed a fairly even split of opinion between agreeing that radioactive wastes should be disposed of at Bradwell Power Station, or within the Plan area, and disagreeing with this approach. However, at the Preferred Approach 2011 stage there was an identified requirement to plan for small quantities</p>



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	<p>Nuclear Licensed Areas at Bradwell, where: This is consistent with the national strategy for managing ILW, LLW and VLLW and discharges and/or the decommissioning plans for the Bradwell power station, and; The outcome of economic and environmental assessments justify its being dealt with on site, and; Facilities are located and designed in order to minimise adverse impacts on the environment and human health.</p>	<p>of radioactive waste from decommissioning the current nuclear power station and other sources such as hospitals, with a potential requirement for larger quantities of waste generated from the possible development of a new nuclear power facility within the plan period. As such, the Preferred Approach 2011 reflected the policy criteria from the Issues and Options stage that consultees broadly agreed with, as well as this identified need. The approach at this Preferred Approach (2011) stage is broadly similar to that of the corresponding revised Preferred Approach (2015) stage and also the Pre-Submission policy. The differences between the approach at this stage and through its progression to Pre-Submission stage are not distinct enough to be considered reasonable alternative approaches. It can be considered that the content of the approach has been taken forward to selection.</p>
	<p>Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015)</p> <p>Proposals for facilities for the treatment, storage or disposal of ILW, LLW or VLLW will only be acceptable within the limits of the existing Intermediate Level Waste (ILW) Interim Storage Facility (ISF) located within the Nuclear Licensed Areas at Bradwell, where this is consistent with the national strategy for managing ILW, LLW and VLLW and the decommissioning plans for the Bradwell power station, informed by the outcome of economic and environmental assessments that justify the management of decommissioning waste on-site.</p> <p>Proposals for such facilities must ensure, through appropriate siting and design, that adverse impacts on the environment and human health are minimised.</p> <p>Please note that any Preferred Approach / policy arising out of the RWLP would be secondary to any Nationally Significant Infrastructure Project.</p>	<p>The approach at this Revised Preferred Approach (2015) stage is broadly similar to that of the preceding Preferred Approach (2011) stage and also the corresponding Pre-Submission policy. The differences between the approach at this stage and through its progression to Pre-Submission stage are not distinct enough to be considered reasonable alternative approaches. It can be considered that the content of the approach has been taken forward to selection.</p>



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	<p>Essex County Council &amp; Southend-on-Sea Borough Council Replacement Waste Local Plan: Pre-Submission (2016)</p>	<p>The Policy has been retitled at this stage to offer more clarity on the situation at Bradwell Power Station, although it should be noted that the content of the Policy has progressed throughout the plan-making process in line with the waste treatment requirements regarding the power station's decommissioning. As such the content of the Policy remains similar to that of the previous revised Preferred Approach (2015) stage and also that at the Preferred Approach (2011) stage. For these reasons, the Policy has been selected.</p>
<p>Policy 8 – Non-Nuclear Very Low-Level and Low-Level Radioactive Waste</p>	<p>Essex County Council and Southend-on-Sea Borough Council Joint Waste Development Document: Issues and Options (2010) – Suggested Policy Criteria</p> <p>The following policy criteria are suggested for the management of low level radioactive waste:</p> <ul style="list-style-type: none"> <li>- 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.</li> <li>- Assess the potential of existing non-hazardous landfill sites within the Plan Area for disposal of certain LLW and VLLW.</li> </ul>	<p>At the Issues and Options stage, it was not necessary to allocate new sites to deal with non-nuclear VLLW and as such policy criteria were explored rather than locational criteria. Since then, the Plan must set out the means by which new facilities would be assessed in order to be flexible. It is considered that the exploration of Policy regarding non-nuclear VLLW and LLW was sufficiently explored at this stage, with two options of considering disposal in the Plan Area and not considering disposal in the Plan Area. 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.</p>
	<p>Essex County Council and Southend-on-Sea Borough Council Joint Waste Development Document: Preferred Approach (2011) – General Locational Criteria</p> <p>Proposals for facilities for the treatment, storage or disposal of ILW, LLW or VLLW generated at Bradwell nuclear power station will only be acceptable within the Nuclear Licensed Areas at Bradwell, where: This is consistent with the national</p>	<p>The consultation responses from the Issues and Options (2010) stage showed a fairly even split of opinion between agreeing that radioactive wastes should be disposed of within the Plan area, and disagreeing with this approach. However, there exists a requirement to plan for the possibility of radioactive waste from sources such as hospitals. The Preferred Approach 2011 reflected the policy criteria from the Issues and Options stage that consultees broadly agreed with; however was focussed on nuclear ILW, VLLW and LLW, of which there is an identified</p>



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	<p>strategy for managing ILW, LLW and VLLW and discharges and/or the decommissioning plans for the Bradwell power station, and; The outcome of economic and environmental assessments justify its being dealt with on site, and; Facilities are located and designed in order to minimise adverse impacts on the environment and human health.</p>	<p>need, and this was largely progressed to both the Preferred Approach (2015) stage and Pre-Submission Policy 7. At the Preferred Approach (2011) stage, it was viewed that as the need for non-nuclear VLLW and LLW management facilities does not exist in the Plan Area, that facilities for this waste stream should not be explored.</p>
	<p>Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015)</p> <p>Proposals for facilities for the treatment, storage or disposal of ILW, LLW or VLLW will only be acceptable within the limits of the existing Intermediate Level Waste (ILW) Interim Storage Facility (ISF) located within the Nuclear Licensed Areas at Bradwell, where this is consistent with the national strategy for managing ILW, LLW and VLLW and the decommissioning plans for the Bradwell power station, informed by the outcome of economic and environmental assessments that justify the management of decommissioning waste on-site.</p> <p>Proposals for such facilities must ensure, through appropriate siting and design, that adverse impacts on the environment and human health are minimised.</p> <p>Please note that any Preferred Approach / policy arising out of the RWLP would be secondary to any Nationally Significant Infrastructure Project.</p>	<p>The Preferred Approach 2015 reflected the criteria from the previous consultation stages, however again focussed on nuclear VLLW and LLW to reflect the identified need to manage this waste stream in the Plan Area. At the Preferred Approach (2015) stage, it was again viewed that as the need for non-nuclear VLLW and LLW facilities in the Plan Area does not exist, facilities for this waste stream should not be explored.</p>
	<p>Essex County Council &amp; Southend-on-Sea Borough Council Replacement Waste Local Plan: Pre-Submission (2016)</p>	<p>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</p>



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		<p>throughout the plan-making process; 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. The Policy content has been established from the principles explored in various iterations dealing with nuclear ILW, VLLW and LLW and as such responds to similar themes and content that has been subject to consultation, most notably in the Issues and Options (2010) Plan, which explored the potential of existing non-hazardous landfill sites within the Plan Area for disposal of certain LLW and VLLW. For all of the above reasons the Policy, as it appears in the Plan, has been selected.</p>
<p>Policy 9 – Waste Disposal Facilities</p>	<p>Essex County Council and Southend-on-Sea Borough Council Joint Waste Development Document: Issues and Options (2010) – Suggested Locational Criteria</p> <p>Location 1 – Void space within existing C&amp;I landfill sites to accept MSW, subject to environmental considerations (Location 1 and Location 2 explored as a single alternative approach)</p> <p>Location 2 – Void space within mineral and landfill sites. (Location 1 and Location 2 explored as a single alternative approach)</p> <p>Location 3 – Within extensions to existing landfill facilities.</p>	<p>Regarding existing void space, it was considered that this approach would not be viable as a criterion for new non-allocated sites as it would form the basis of, and be a key influence in determining, those allocated sites within the Plan. It could also conflict with the restoration proposals and requirements of minerals sites in the Adopted RMLP and its accompanying Biodiversity SPD.</p> <p>As such the general approach as a single option was rejected for these purposes.</p> <p>Regarding extensions to existing landfill sites it was noted that this alternative would be dependent upon mineral extraction preceding landfilling which as an approach may not be sufficiently flexible. However, in reality most allocated inert landfill sites are extensions either to existing landfill or mineral sites 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>
	<p>Essex County Council and Southend-on-Sea Borough Council Joint Waste Development Document: Preferred Approach (2011) – General Locational Criteria (for non-hazardous, hazardous and new landfill facilities)</p>	<p>As a result of the Issues and Options (2010) consultation it was considered appropriate to develop separate Preferred Approaches for hazardous and non-hazardous landfill, to reflect the fact that different types of landfill facilities will be appropriate in different locations. Since then,</p>



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	<p>Locational Criteria for Non-hazardous Landfill Facilities - Proposals for new non-hazardous landfill facilities will only be acceptable if monitoring shows a need for non-hazardous landfill of Essex and Southend-on-Sea's waste, which will not undermine the achievement of statutory recycling and recovery targets, and where there is a clear restoration need identified. The WPAs will require the proposed measures for restoring the land to be feasible and to result in an acceptable and sustainable after-use. The landfilling of waste that could practicably be recycled, composted or recovered will not be acceptable. Proposals for new non-hazardous landfill facilities that meet the criteria above may only be acceptable in the following locations subject to the principle of mineral extraction being approved as a preferred site within the Minerals DD, and provided they are in line with the policies in this WDD: Permitted Landfill sites safeguarded; Void space within existing landfill currently only designated for disposing of C&amp;I, which have the potential to also accept MSW; (and) Proposals for an extension of time to complete the permitted restoration within the boundary of existing landfill facilities. Non-hazardous landfill proposals would not be permitted within 250m of residential dwellings or other sensitive land uses unless special measures are included to control dust, noise and odour. Landfill gas utilisation plants for energy recovery will be required at existing and new non-hazardous landfill sites, unless it can be demonstrated that it is not practicable (e.g. due to inability to make connection to the national grid without unreasonable harm to residential amenity and/or the environment). Adequate arrangements will be made to prevent landfill gas migration to adjoining land. The proposed method of landfill gas collection is environmentally and visually acceptable for as long as facilities have to remain.</p> <p>Locational Criteria for Hazardous Landfill Facilities - Proposals for new hazardous landfill facilities will only be acceptable where they meet the Plan area's identified</p>	<p>the 2011 Preferred Approach as an alternative option was considered limiting and inflexible in so far as there being 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 this approach as an alternative has since been rejected.</p>



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	<p>requirement for hazardous waste disposal for Essex and Southend-on-Sea's waste. The WPAs will require the proposed measures for restoring the land to an acceptable and sustainable after-use to be feasible. The landfilling of waste that could practicably be treated or recovered will not be acceptable. Proposals for new hazardous landfill facilities that meet the criteria above would be suitable in the following locations, provided they are in line with the policies in this WDD: Void space created through mineral workings; within extensions to existing landfill facilities. Hazardous landfill proposals would not be permitted within 250m of residential dwellings or other sensitive land uses unless special measures are included to control emission, dust, noise and odour.</p> <p>Proposals for new landfill facilities which come forward on non-allocated sites should demonstrate: 1. In the case of non-hazardous proposals, they are necessary to deal with non-hazardous waste arising in the Plan area based on the principles of net self-sufficiency, and applicants should also demonstrate how the proposed scheme would: Be in line with an extension of time to complete the permitted restoration within the boundary of existing landfill facilities; Not be permitted within 250m of residential dwellings or other sensitive land uses unless special measures are included to control dust, noise and odour and; Include capture of the landfill gas, for recovery of energy by the most efficient methods, where practicable, and have given consideration to the ability to connect to a district heat network or for converting recovered gas for injection to the gas pipeline network. 2. In the case of inert and Stable Non-Reactive Hazardous Waste, applicants should demonstrate that they are more suitable than the allocated sites (with reference to the same site assessment criteria and method used for selecting the allocated sites. Please see the Site Assessment &amp; Allocations Report, and/or the individual site pro-formas for further details), or that they are replacing an</p>	



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	<p>existing safeguarded facility and the proposed site is in conformity with the policies in this Plan once adopted. Applicants for new non-allocated inert landfill sites should also demonstrate how the proposed scheme would support on-site restoration and / or meet local derived demand (particularly in relation to key centres for growth).</p>	
	<p>Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015)</p> <p>Proposals for new landfill facilities which come forward on non-allocated sites should demonstrate:</p> <ol style="list-style-type: none"> <li>1. In the case of non-hazardous proposals, they are necessary to deal with non-hazardous waste arising in the Plan area based on the principles of net self-sufficiency, and applicants should also demonstrate how the proposed scheme would: <ul style="list-style-type: none"> <li>- Be in line with an extension of time to complete the permitted restoration within the boundary of existing landfill facilities.</li> <li>- Not be permitted within 250m of residential dwellings or other sensitive land uses unless special measures are included to control dust, noise and odour and;</li> <li>- Include capture of the landfill gas, for recovery of energy by the most efficient methods, where practicable, and have given consideration to the ability to connect to a district heat network or for converting recovered gas for injection to the gas pipeline network.</li> </ul> </li> <li>2. In the case of inert and Stable Non-Reactive Hazardous Waste, applicants should demonstrate that they are more suitable than the allocated sites (with</li> </ol>	<p>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>





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	<p>reference to the same site assessment criteria and method used for selecting the allocated sites. Please see the Site Assessment &amp; Allocations Report, and/or the individual site pro formas for further details), or that they are replacing an existing safeguarded facility and the proposed site is in conformity with the policies in this Plan once adopted.</p> <p>Applicants for new non-allocated inert landfill sites should also demonstrate how the proposed scheme would support on-site restoration and / or meet local derived demand (particularly in relation to key centres for growth).</p>	
Policy 10 – Development	Essex County Council and Southend-on-Sea Borough Council Joint Waste	<p>The Pre-Submission policy regarding landfill facilities has been amended from the Revised Preferred Approach (2015) stage in order to offer heightened flexibility. The Policy reflects a single approach to all landfill proposals relevant to the Plan Area, deviating from the Revised Preferred Approach (2015) approach of offering slightly different criteria for landfill proposals of different types of waste. It is not considered within this SA that the difference in approach would have any significantly different sustainability impacts. Policy 9 factors in the possibility that a site allocation for landfill in the Plan could be proved to be unsuitable or unavailable, or comparably less so than any future proposal. This stance has been taken where the vast majority of District level growth targets are unknown at this stage, due to the respective progress of District level Local Plans in the Plan Area, and there being subsequent requirements for waste (of any type) to be managed as close to its source as possible. Aside from the heightened importance of flexibility within the Policy, the content and implications of the approach is and are not distinct enough to be considered an alternative approach to that presented as preferred in the Revised Preferred Approach (2015). For these reasons the Policy has been selected.</p> <p>At the Issues and Options stage, the different development management issues were considered separately. For each issue, a range of policy criteria were proposed and consultees</p>



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<p>Management Criteria</p>	<p>Development Document: Issues and Options (2010) – Suggested Policy Criteria</p> <p>Issue 23 outlined general considerations that will be taken into consideration in relation to all waste management development. These included: Potential impact on residential amenity; Potential flood risk; Potential impact upon the local water environment; Potential impact upon landscape; Potential impact upon archaeological or cultural heritage; Potential impact upon agricultural land; Potential impact from noise, dust and vibration; Potential impact upon air quality, including odour; Potential visual impact, including light disturbance; Potential impact upon public open space and Public Rights of Way; Requirements of PPG13, including proposed vehicle movements and access; Land instability and contamination; Site management issues including litter, vermin, birds and hours of operation; Potential impact upon local aerodrome operators; (and) Site restoration, including the potential for nature conservation and increase public accessibility.</p>	<p>were asked to comment on them, rather than setting out distinct options to be chosen or rejected. The range of criteria is not distinctly different enough from the Pre-Submission approach to be considered a reasonable alternative. As such, the criteria have been largely selected and progressed through to the Pre-Submission stage.</p>
	<p>Essex County Council and Southend-on-Sea Borough Council Joint Waste Development Document: Preferred Approach (2011)</p> <p>Waste management development proposals will be acceptable, subject to meeting the other policies of this WDD and provided satisfactory provision is made to avoid unacceptable impacts and maximise opportunities in respect of the following: The potential for economic and social benefits through provision of the facility, including employment generation; The potential effect on general amenity of neighbouring occupiers, in particular as a result of noise, odour, visual impacts (including light pollution) dust or vibration from both the facility operation and HGV transportation of waste to and from the facility. Hours of operation may be restricted in order to mitigate these potential effects on residential amenity; The potential to enhance and/or protect geodiversity and biodiversity within the Plan area (including</p>	<p>The range of criteria is not distinctly different enough from the Pre-Submission approach to be considered a reasonable alternative. As such, the criteria have been largely selected and progressed through to the Pre-Submission stage.</p>



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	<p>internationally, nationally and locally designated sites and species or features identified in UK, Essex and Southend-on-Sea Biodiversity Action Plans, and the green infrastructure network of the Plan area). In particular, proposals should avoid loss or fragmentation of geological assets or habitat, disturbance or harm to species, as a result of noise, visual impacts (including light pollution) dust or vibration from both the facility operation and transportation of waste to and from the facility. Periods of facility construction and hours of operation may be restricted seasonally to mitigate potential effects on protected species; The potential effect on countryside, including landscape and visual impacts and light pollution of tranquil areas. Proposals should be well designed and seek opportunities to enhance or be integrated with the surrounding environment and relevant landscape/townscape character area in accordance with the Essex and Southend-on-Sea Landscape Character Assessments and the relevant district/borough level landscape assessments; The potential effect on historic, archaeological or cultural sites/assets and their setting; The potential effect on agricultural land, in particular loss of Grades 1, 2 or 3a agricultural land; The potential effect on public open space and Public Rights of Way, to safeguard and protect amenity of the users of these recreational assets and where practicable improve access and connections to the PROW network; The potential effect on local aerodromes and airports, in particular the risk of bird strike within safeguarding areas; (and) The potential effect on the purposes of the Green Belt in locations within the Metropolitan Green Belt.</p>	
	<p>Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015)</p> <p>To permit proposals for waste development where it can be suitably demonstrated that the development would not have an unacceptable impact, including cumulative</p>	<p>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</p>



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	<p>impacts with other developments, on the following: The wider potential for economic and social benefits through provision of the facility; The potential effect on local amenity of neighbouring occupiers; The potential to protect and / or enhance geodiversity and biodiversity (including internationally, nationally and locally designated sites, and species or features identified in UK, Essex and Southend-on-Sea Biodiversity Action Plans, and the green infrastructure network of the Plan area); In particular, proposals should avoid loss or fragmentation of geological assets or habitat, disturbance or harm to species, because of noise, visual impacts (including light pollution) dust or vibration from both the facility operation and transportation of waste to and from the facility; The potential effect on countryside, including landscape and visual impacts, light pollution and tranquillity. Proposals should be well designed and seek opportunities to enhance or be integrated with the surrounding environment and relevant landscape / townscape character area in accordance with the Essex and Southend-on-Sea Landscape Character Assessments and the relevant district / borough level landscape assessments; The potential effect on historic, archaeological or cultural sites/assets and their setting; The potential effect on agricultural land, in particular loss of Grades 1, 2 or 3a agricultural land; The potential effect on public open space, outdoor recreation facilities and the definitive Public Rights of Way network, to safeguard and protect amenity of the users of these recreational assets and where practicable improve access and connections to the PROW network; The potential effect on local aerodromes and airports, in particular the risk of bird strike within safeguarded areas; The potential effect on locations within the Metropolitan Green Belt; The quality and quantity of water within watercourses, groundwater and surface water and the capacity of sustainable drainage systems. Proposals should demonstrate they maximise flood resilience and reduces the flood risk on the site and its surroundings. For the purposes of data collection and monitoring</p>	<p>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.</p>



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	<p>within the annual monitoring reports, where additional waste capacity is permitted, operators will be required to notify the Waste Planning Authority of commencement of construction and commencement of operations. In addition, details of annual throughput of the facility once commenced must be provided on the request of the Waste Planning Authority for the purposes of annual capacity monitoring, if required.</p> <p>Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015) - Alternative 1: To have separate policies on the following development management issues – Health Impact Assessments, landscape and townscape, and biodiversity.</p>	<p>At the Issues and Options stage, these different development management issues were considered separately. For each issue, a range of policy criteria were proposed and consultees were asked to comment on them, rather than setting out distinct options to be chosen or rejected. Notably, for Health Impact Assessments four options were explored (Option 1: Where development of a particular size is proposed [e.g. above a particular land area, or managing over a particular tonnage of waste]; Option 2: Where waste management of a particular type is proposed [e.g. anaerobic digestion]; Option 3: Where waste management is proposed within 250m of sensitive receptors [housing, schools and hospitals], and within 400m in the case of WwTWs; Option 4: On a case by case basis, where there is potential for significant effects on health). The 2011 Preferred Approach document stated that, in rejecting the need for Health Impact Assessments, ‘the need for Health Impact Assessments was considered in the WDD: Issues and Options report. However, government research has concluded that modern waste management practices have at most a minor effect on human health. In addition, PPS10: Planning for Sustainable Waste Management states in paragraph 30 that: “Modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health.” It also states that the detailed consideration of a waste management process and the implications, if any, for human health is the responsibility of the pollution control authorities. Where concerns about health are raised, waste planning authorities should avoid carrying out</p>



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		<p>their own detailed assessment of epidemiological and other health studies. The Environment Agency is responsible for issuing environmental permits for waste facilities, and these include conditions relating to odour.'</p> <p>In rejecting the approach of separate policies on the listed development management issues, the WPAs' analysis of the consultation responses and the Annual Monitoring Report, as well as 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. As such this alternative approach was rejected.</p>
	<p>Essex County Council &amp; Southend-on-Sea Borough Council Replacement Waste Local Plan: Pre-Submission (2016)</p>	<p>The range of criteria 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 a notable inclusion that proposals may be required to be accompanied with a project-level HRA in certain instances and within specific distances. As such, the Policy approach has been selected.</p>
<p>Policy 11 – Mitigating and Adapting to Climate Change</p>	<p>Essex County Council and Southend-on-Sea Borough Council Joint Waste Development Document: Issues and Options (2010) – Suggested Policy Criteria</p> <p>Proposals for new waste management facilities should: Demonstrate the need for the type of waste management process, relating this to the waste management capacity gap for the Plan Area, and to opportunities for managing waste further up the Waste Hierarchy; Demonstrate how the proposed facility will make efficient use</p>	<p>National Planning Policy requires that measures to mitigate and adapt to climate change are incorporated into new development proposals, including waste. ECC corporate policies and strategies aspire to develop deliver a Zero-Waste economy, to value waste arisings as a resource, and managing waste in a cost effective way, minimising the impact on the environment.</p> <p>The ECC and SBC (2015) Non-Technical Capacity Summary supports waste management in</p>



Policy	Alternative Explored in Plan Making Process	Reason for Rejection
	<p>of energy, recover and utilise energy from waste where appropriate and feasible; Be consistent with transport policies of this WDD by connecting to the main highway network (key routes (motorways and trunks roads) and county routes), reducing total transport distances and seeking the most sustainable modes of transport possible; Avoid areas at risk of flooding; Avoid increasing pressure on natural resources such as water, which may result from over-abstraction and pollution; (and) Incorporate measures for sustainable design and construction.</p> <p>Essex County Council and Southend-on-Sea Borough Council Joint Waste Development Document: Preferred Approach (2011) – Suggested Policy Criteria</p> <p>Proposals for new waste management facilities should through their construction and operation, minimise their potential contribution to climate change by reducing carbon emissions, incorporating energy and water efficient design measures and being adaptable to future climatic conditions.</p> <p>A: Proposals for new waste facilities should set out how this will be achieved, which may include: Demonstrating how the location, design including associated buildings and transportation related to the development will limit carbon emissions; Supporting opportunities for decentralised and renewable or low-carbon energy supply, subject to compliance with other policies in the development framework; Use of sustainable drainage systems, water harvesting from impermeable surfaces and layouts that accommodate waste water recycling; Incorporating proposals for sustainable travel including travel plans where appropriate.</p> <p>B: Proposals for new waste management facilities will only be permitted where: 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; Existing and proposed</p>	<p>line with the waste hierarchy. It identifies a need for future capacity requirements based on the principles of national planning policy and local ambitions/evidence.</p> <p>The SA of the previous Preferred Approach WDD (2011) stated that, 'At the Issues and Options stage, suggested policy criteria were proposed in relation to mitigating and adapting to climate change, rather than distinct alternatives being suggested. Suggestions for alternative approaches were requested where respondents did not agree fully with the suggested policy approach. Of the 29 respondents who selected either 'yes' or 'no', 23 broadly agreed with the suggested policy approach, and this is reflected in the Preferred Approach.' The SA/SEA of the Issues and Options WDD stated that there would be 'major positive impacts on climate change (SEA Objective 8) through efficient use of energy and the recovery and utilisation of energy from waste where appropriate and feasible.' There would also be 'major positive impacts on sustainable management of waste (SEA Objective 9) where proposals demonstrate the need for the type of waste management process in relation to the waste hierarchy and the waste management capacity gap in the Plan Area. In addition there would be 'indirect positive impacts on SEA Objectives 1 (biodiversity) and 2 (water quality) through avoiding increased pressure on natural resources' and 'positive impacts on SEA Objective 3 (flood risk) through avoiding areas at risk of flooding.' There would also be 'positive impacts on SEA Objectives 7 (air quality) and 10 (transport) where facilities are consistent with transport policies of the WDD by reducing total transport distances and seeking the most sustainable modes of transport possible.'</p> <p>The findings of the two previous Sustainability Appraisals at the Issues and Options (2010) and Preferred Approach WDD (2011) stages have contributed to the Preferred Approach.</p> <p>For all the above reasons, there have been no distinctively alternative approaches developed for mitigating and adapting to climate change. It is considered, and has been decided, 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</p>



Policy	Alternative Explored in Plan Making Process	Reason for Rejection
	<p>flood defences are protected and there is no interference with the ability of responsible bodies to carry our flood defence works and maintenance where applicable; There would not be an unacceptable risk to the quantity and quality of surface and groundwaters, or impediment to groundwater flow.</p> <p>Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015)</p> <p>To require proposals for new waste management facilities through their construction and operation, 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.</p> <p>1. Proposals for new waste facilities should set out how this will be achieved, which may include: Demonstrating how the location, design (including associated buildings) and transportation related to the development will limit greenhouse gas emissions; Supporting opportunities for decentralised and renewable or low-carbon energy supply, subject to compliance with other policies in the Development Framework; Use of sustainable drainage systems, water harvesting from impermeable surfaces and layouts that accommodate waste water recycling; Incorporating proposals for sustainable travel including travel plans where appropriate.</p> <p>2. Proposals for new waste management facilities will only be permitted where: 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; 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</p>	<p>Waste Local Plan or the evidence base of the Plan itself.</p>





Policy	Alternative Explored in Plan Making Process	Reason for Rejection
	<p>applicable; There would not be an unacceptable risk to the quantity and quality of surface and ground waters, or impediment to groundwater flow.</p> <p>Essex County Council &amp; Southend-on-Sea Borough Council Replacement Waste Local Plan: Pre-Submission (2016)</p>	<p>The content of the preceding approach in the Revised Preferred Approach (2015) is largely similar to that of the Pre-Submission Policy. The Pre-Submission Policy has however progressed to include further detail on the requirements of proposals which are capable of directly producing energy or a fuel from waste in section 3. 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 and has therefore been selected.</p>
<p>Policy 12 – Transport and Access</p>	<p>Essex County Council and Southend-on-Sea Borough Council Joint Waste Development Document: Issues and Options (2010) – Suggested Policy Criteria</p> <p>Proposals for new waste management facilities should: Apply the proximity principle by 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; Focus on regional interchange centres and inter-urban/intra-urban routes with existing capacity as defined by the main highway network; Avoid increased traffic in rural areas, unless a rural location can be justified in accordance with relevant locational criteria; Wherever practicable, seek opportunities to transport waste by rail or water; Identify and put in place measures to mitigate any adverse impact on people and the environment, such as emissions and noise.</p>	<p>The most distinct difference between the Issues and Options (2010) policy criteria and those of the Pre-Submission Approach was that the Issues and Options approach sought 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).’ This approach was rejected as it 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.</p>



Policy	Alternative Explored in Plan Making Process	Reason for Rejection
	<p>Essex County Council and Southend-on-Sea Borough Council Joint Waste Development Document: Preferred Approach (2011)</p> <p>The order of preference for transportation of waste to and from proposed new waste management facilities would be: 1. Wherever practicable, seek opportunities to transport waste by rail or water (where this does not undermine the WDD aim of net self-sufficiency); 2. Road access via a short length of suitable existing road to a suitable existing junction with the main road network (trunk road, strategic route or main distributor) as defined within Highways Development Management Policies February 2011, Route Hierarchy Plan; 3. Road access directly on to the main road network where there is no existing access point or junction. This would involve development of a new access point, which would need to be constructed in accordance with the County Council's Highway Standards; 4. Where access to the main road network is not feasible, road access via a suitable existing secondary road should be used before gaining access on to the main road network, subject to scale of development, capacity of the road is adequate and there will be no undue impact on road safety or the environment.</p>	<p>Appendix A of the Preferred Approach (2011) WDD stated that, 'at the Issues and Options stage, suggested policy criteria were proposed in relation to highways and transportation, rather than distinct alternatives being suggested. Suggestions for alternative approaches were requested where respondents did not agree fully with the suggested policy approach. Of the 29 respondents that selected either 'yes' or 'no', 27 broadly agreed with the suggested policy approach, and this is reflected in the Preferred Approach.'</p> <p>The content of the Preferred Approach (2011) was progressed to all subsequent iterations of the Plan. As such the content at this stage has been predominantly selected at the Pre-Submission stage, with any differences considered sufficiently indistinct to be considered as a reasonable alternative (for the requirement of identifying such as specified in the SEA Directive).</p>
	<p>Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015)</p> <p>To provide an order of preference for transportation of waste to and from proposed new waste management facilities, as follows: 1. Wherever practicable, seek opportunities to transport waste by rail or water; 2. Access 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</p>	<p>The content of the Revised Preferred Approach 2015, following on from the 2011 Preferred Approach, has been largely progressed as the Pre-Submission approach to the transportation of waste in the Plan. As such the content at this stage has been progressed and predominantly selected at the Pre-Submission stage, with any differences considered sufficiently indistinct to be considered as a reasonable alternative (for the requirement of identifying such in accordance with the SEA Directive).</p>



Policy	Alternative Explored in Plan Making Process	Reason for Rejection
	<p>safety and efficiency of the network; 3. Where (2) above is not feasible, direct access to the main road network involving the construction of a new access / junction where there is no suitable existing access point or junction; 4. Where access to the main road network in accordance with (ii) and (iii) 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>	
	<p>Essex County Council &amp; Southend-on-Sea Borough Council Replacement Waste Local Plan: Pre-Submission (2016)</p>	<p>The Pre-Submission Policy has been selected where it seeks opportunities to transport waste by more sustainable modes. It transposes national policy requirements in a local context and acknowledges that a lack of suitable rail or water infrastructure means that waste will continue to be primarily transported by road. The Policy then identifies a suitable hierarchy including those related to the main road network, commensurate with access criteria used in the Plan's Site Assessment Methodology. For these reasons the Policy has been selected. The content of the Revised Preferred Approach 2015, following on from the 2011 Preferred Approach, has been largely progressed as the Pre-Submission approach to the transportation of waste in the Plan. As such the content at this stage has been predominantly selected at the Pre-Submission stage, with any differences considered sufficiently indistinct to be considered as a reasonable alternative (for the requirement of identifying such in accordance with the SEA Directive).</p>
<p>Policy 13 - Landraising</p>	<p>Essex County Council and Southend-on-Sea Borough Council Joint Waste Development Document: Issues and Options (2010) – Suggested approach / criteria</p> <p>The Waste Planning Authority should be consulted when a development application is considered by a local planning authority to constitute a 'waste</p>	<p>At this stage suggested policy criteria were consulted upon with a request that alternative or additional content be suggested. Of the responses, only 2 disagreed with the suggested criteria and where they sought an amendment to the criteria these were incorporated in the Preferred Approach (2011). As such no distinct alternative approaches were developed, and the content was progressed at the time.</p>



Policy	Alternative Explored in Plan Making Process	Reason for Rejection
	<p>disposal activity'. Areas of landfill/raise for the deposit of waste will only be permitted where: there is an identified need for inert waste to be disposed of in this manner; there is no acceptable alternative waste management option, taking into account the capacity of existing and permitted recycling and treatment facilities and landfill sites; the proposal is restoration-led; the proposal would not result in harm to human health and the natural environment; the proposals would not result in an unacceptable landscape impact; and the principal of the overall development is accepted.</p> <p>Essex County Council and Southend-on-Sea Borough Council Joint Waste Development Document: Preferred Approach (2011) – Preferred Approach</p> <p>The landfilling or landraising of inert waste that could practicably be re-used, recycled, or reprocessed will not be acceptable. Landfill and landraising for own sake with no restoration or engineering need will not be accepted. Where landraising is proposed as part of an engineering project to achieve the primary development, the principle of the land use proposed as the primary development must be in compliance with the district LDF, and must demonstrate the minimum amount of material required to meet the development. Proposals for inert landraising that constitutes a waste disposal activity (rather than a valid engineering and/or construction project), will only be acceptable where there is an identified need for restoration and for inert waste to be disposed of in this manner. This will only be acceptable where this does not undermine the provision of waste development on strategic inert landfill sites safeguarded in Preferred Approach 4, or delivered through Preferred Approach 16, and/or where no acceptable alternative form of waste management can be made available to meet the need. All proposals must demonstrate that they would not divert inert waste material away</p>	<p>Of the 23 consultees that responded at the Issues and Options stage, a significant majority (21) agreed with the suggested policy criteria and only 2 disagreed. Where they sought an amendment to the criteria these were incorporated in the Preferred Approach (2011) where appropriate. As such the content was progressed at the time. The Pre-Submission Approach is not distinctively different from the 2011 Preferred Approach to be considered a reasonable alternative.</p>



Policy	Alternative Explored in Plan Making Process	Reason for Rejection
	<p>from existing mineral workings / landfill sites which require the material for restoration purposes. All inert landfill and landraise proposals would need to meet the policies in this WDD. The WPAs will require the proposed development and use of the inert waste to be an acceptable and sustainable use.</p>	
	<p>Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015) – Preferred Approach</p> <p>Landraising for its own sake, with no demonstrable restoration or engineering need will not be permitted. Landraising may be considered as part of an essential engineering project to achieve the primary development (for example coastal defence works or engineering works for highways provision), and where the principle of the land use proposed as the primary development is in compliance with the district Local Development Framework. In these instances, the proposal must demonstrate the minimum amount of material necessary to meet the requirements of the development. Landraising might be acceptable in instances where there is a proven benefit that outweighs any harm caused by a proposal. Again, the proposal must demonstrate the minimum amount of material necessary to meet the requirements of the development, and articulate this benefit. Proposals for inert landraising that are considered to constitute a waste disposal activity, rather than a valid engineering and / or construction project, will only be acceptable where there is an identified need for restoration and for inert waste to be disposed of in this manner. Landraising will only be acceptable where: It can be suitably demonstrated no acceptable alternative form of development can be made available to meet the need and where it does not undermine: The provision of waste development on strategic inert landfill sites safeguarded in Preferred Approach 3; Delivery by Preferred Approach 8, Preferred Approach 9, or Preferred</p>	<p>The results of previous consultations formed the content of the Plan's approach to landraising. Up until this stage, no other distinctly different alternative approaches had emerged through the plan-making process and the various consultation stages of the Plan. The approach was considered suitable in mind of the characteristics of the Plan Area and in addition to the Plan's evidence base. The Preferred Approach (2015) approach to landraising is not distinctly different to that of the Pre-Submission policy and as such can be considered to have been selected.</p>



Policy	Alternative Explored in Plan Making Process	Reason for Rejection
	<p>Approach 16; and/or It must be demonstrated that the amount of material imported and deposited would be the minimum necessary to bring about any alleged improvements. All inert landfill and landraise proposals would also need to meet the policies in the RWLP once adopted.</p>	
	<p>Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015) – Alternative 1: To adopt a less restrictive 'locational criteria' based approach to landraising</p>	<p>In light of no previous iterations of the Plan exploring a contrary approach to landraising it was considered appropriate to explore, for robustness, a 'more flexible' alternative approach at the 2015 Revised Preferred Approach stage. This alternative approach was highlighted as having negative impacts on relevant sustainability objectives / criteria. The alternative was rejected as it 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. As such the alternative was rejected.</p>
	<p>Essex County Council &amp; Southend-on-Sea Borough Council Replacement Waste Local Plan: Pre-Submission (2016)</p>	<p>The Pre-Submission Policy can be seen to be largely similar to that of the Revised Preferred Approach (2015) and all other consultation versions of the Plan. The Policy has been selected where it reflects the recycling of inert material as defined within the Waste Hierarchy and ensures that appropriate waste is available for required 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).</p>
<p>Policy 14 – Landfill Mining and Reclamation</p>	<p>Essex County Council and Southend-on-Sea Borough Council Joint Waste Development Document: Issues and Options (2010)</p>	<p>The requirement and viability of exploring landfill mining and reclamation was not established at this stage. As such the issue was not explored and no alternative approaches were developed.</p>
	<p>Essex County Council and Southend-on-Sea Borough Council Joint Waste Development Document: Preferred Approach (2011)</p>	<p>The requirement and viability of exploring landfill mining and reclamation was not established at this stage. As such the issue was not explored and no alternative approaches were developed.</p>



Policy	Alternative Explored in Plan Making Process	Reason for Rejection
	<p>Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015)</p> <p>To only permit the mining of waste where: The site is demonstrated to be endangering or has the potential to endanger, human health or harm the environment; and / or removal of the waste is required to facilitate major infrastructure projects. In this case it must be demonstrated that there are no other locations which are suitable for the infrastructure. Proposals will be required to assess the potential for capturing any fuel/energy produced as part of the mining operation.</p>	<p>The Plan area has the environmental legacy associated with the historic use of landfill. There are almost 400 historic landfills located across Essex ranging across different landfill types. In parallel, as resources have become scarcer (including contaminated land which could otherwise be used for development), the value in previously disposed wastes is increasingly recognised. With the notion of the circular economy gaining momentum, attention is turning towards what potential value could be recovered through landfill mining. Landfill Mining and Reclamation (LFMR) can recover the materials and / or energy contained within previously disposed of waste and this could be seen as an unusual twist on the waste hierarchy, which has primarily been brought about due to the realisation that resources are becoming scarcer. At present actual landfill mining schemes are little more than trials as it is not yet seen to be entirely viable and / or cost effective at a significant scale. Despite this, at present LFMR could be an appropriate option in specific locations or circumstances. Examples of this situation would include if the site suffers from poor engineering, or if it is currently the cause of significant pollution, which outweighs that which could be created by its opening. In such cases, landfill mining may be justified and the eventuality should be included within the Plan. The Revised Preferred Approach (2015) approach to landfill mining and reclamation has been selected and progressed to largely reflect the content of the Pre-Submission Policy.</p>
	<p>Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan: Revised Preferred Approach (2015) - Alternative 1: To not have a policy on the mining of waste.</p>	<p>The requirement and viability of exploring landfill mining and reclamation was not established at the Issues and Options (2010) or Preferred Approach (2011) stages. As such the issue was not explored and no alternative approaches were developed. Despite this, the absence of a policy on landfill mining and reclamation offers an alternative approach in itself. 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</p>



Policy	Alternative Explored in Plan Making Process	Reason for Rejection
		including a policy on the mining of waste.
	Essex County Council & Southend-on-Sea Borough Council Replacement Waste Local Plan: Pre-Submission (2016)	The Pre-Submission Policy approach to landfill mining and reclamation has been selected and progressed from the content of the preceding iteration in the Revised Preferred Approach (2015). The Plan Area has a legacy associated with historic landfilling operations, with almost 400 historic landfills of various types located across Essex. 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. 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 and for this reason the Policy has been selected.

**Table 5: How the results of Consultations have been taken into account: Strategic Site Allocations:**

Site Reference	Site Name / Address	Reason for allocation / rejection
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**Enclosed Waste Facilities: In-vessel composting facilities**

W3	Basildon WWTW 1, Courtauld Road, Basildon	ALLOCATED: 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.
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Site Reference	Site Name / Address	Reason for allocation / rejection
W20	Courtauld Road, Burnt Mills, Basildon	ALLOCATED: 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.
W7	Sandon East, Chelmsford	REJECTED: Not allocated for use as biological treatment. Has been allocated in the Plan for another use.
W8	Elsenham, Uttlesford	REJECTED: Not allocated for use as biological treatment. Has been allocated in the Plan for another use.
W21	Dollymans Farm, Doublegate Lane, Basildon / Rochford	REJECTED: The site is within the Greenbelt.
W30	Pitsea Landfill, Pitsea Hall Lane, Basildon	REJECTED: The site is within the Greenbelt.
W32	Crumps Farm, Lt Canfield, Uttlesford	REJECTED: Not allocated for use as biological treatment. Has been allocated in the Plan for another use.
SIE5	The Basketworks, Grange Road, Tiptree, Colchester	REJECTED: The site is 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.

**Enclosed Thermal Facilities: Anaerobic Digestion / Biogas (AD)**

W3	Basildon WWTW 1, Courtauld Road, Basildon	ALLOCATED: The site scored highly against other sites considered for allocation in the Waste Site Assessment Report. It is also
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Site Reference	Site Name / Address	Reason for allocation / rejection
		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.
W20	Courtauld Road, Burnt Mills, Basildon	ALLOCATED: 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.
W29	Bellhouse Landfill Site, Warren lane, Colchester	ALLOCATED: 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.
W1	Green Acres, Old Packards Lane, Wormingford, Colchester	REJECTED: The site is not considered to be suitable in Highway Terms and/or does not comply with Transport Policy.
W7	Sandon East, Chelmsford	REJECTED: 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	Elsenham, Uttlesford	REJECTED: 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.



Site Reference	Site Name / Address	Reason for allocation / rejection
W13	Wivenhoe Quarry Plant Area, Colchester	REJECTED: 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.
W17	Allens Farm, Wivenhoe Road, Colchester, CO7 7BN	REJECTED: The site is not considered to be suitable in Highway Terms and/or does not comply with Transport Policy.
W21	Dollymans Farm, Doublegate Lane, Basildon / Rochford	REJECTED: The site is within the Greenbelt.
W31	Morses Lane, Brightlingsea, Tendring	REJECTED: 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.
W32	Crumps Farm, Lt Canfield, Uttlesford	REJECTED: 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.
SIE5	The Basketworks, Grange Road, Tiptree, Colchester	REJECTED: The site is not 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.

**Open Air Facilities: Construction, Demolition and Excavation Waste (CD&EW) Recycling Facilities (or inert recycling/soil screening and non-inert recycling)**

L(i)10R	Blackley Quarry, Gate Farm Site 1, Chelmsford	ALLOCATED: 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
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Site Reference	Site Name / Address	Reason for allocation / rejection
		proximity principle.
L(i)17R	Newport Quarry, Uttlesford	ALLOCATED: 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	Slough Farm, Ardleigh – Area 1, Tendring	ALLOCATED: 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.
W7	Sandon East, Chelmsford	ALLOCATED: 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.
W8	Elsenham, Uttlesford	ALLOCATED: 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.
W31	Morses Lane, Brightlingsea, Tendring	ALLOCATED: 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.
W32	Crumps Farm, Lt Canfield, Uttlesford	ALLOCATED: 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) in



Site Reference	Site Name / Address	Reason for allocation / rejection
		the broad area including L(n)7R and L(n)8R.
W36	Sunnymead, Elmstead and Heath Farms, Tendring	<p>ALLOCATED: 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 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>
L(i)4R	Shellow Cross Farm, Willingale, Chelmsford / Epping	REJECTED: The site is within the Green Belt.
L(n)6R	Pitsea Landfill, Pitsea Hall Lane, Basildon	REJECTED: The site is within the Green Belt.
L(n)7R	Little Bullocks Farm Site A22, Uttlesford	REJECTED: 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.
L(n)8R	Little Bullocks Farm Site A23, Uttlesford	REJECTED: 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.
W1	Green Acres, Old Packards Lane, Wormingford, Colchester	REJECTED: The site is not considered to be suitable in Highway Terms and/or does not comply with Transport Policy.



Site Reference	Site Name / Address	Reason for allocation / rejection
W3	Basildon WWTW 1, Courtauld Road, Basildon	REJECTED: 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.
W13	Wivenhoe Quarry Plant Area, Colchester	REJECTED: 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	Alresford, Tendring	REJECTED: The site is not considered to be suitable in Highway Terms and/or does not comply with Transport Policy.
W15	Wellwick, Martins Farm, St Osyth, Tendring	REJECTED: 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.
W18	Batemans Farm, Lynderswood Lane, Braintree / Chelmsford	REJECTED: The site is not considered to be suitable in Highway Terms and/or does not comply with Transport Policy.
W19	Hastingwood, London Road, Harlow	REJECTED: 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.



Site Reference	Site Name / Address	Reason for allocation / rejection
W21	Dollymans Farm, Doublegate Lane, Basildon / Rochford	REJECTED: The site is within the Greenbelt.
W24	Widdington, Hollow Road, Uttlesford	REJECTED: The site is not considered to be suitable in Highway Terms and/or does not comply with Transport Policy.
W35	Armigers Farm, Uttlesford	REJECTED: The site is not considered to be suitable in Highway Terms and/or does not comply with Transport Policy.
SIE5	The Basketworks, Grange Road, Tiptree, Colchester	REJECTED: The site is not 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.

#### Open Air Facilities: Windrow Composting

W29	Bellhouse Landfill Site, Warren lane, Colchester	ALLOCATED: 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.
W7	Sandon East, Chelmsford	REJECTED: 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.



Site Reference	Site Name / Address	Reason for allocation / rejection
W8	Elsenham, Uttlesford	REJECTED: 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.
W21	Dollymans Farm, Doublegate Lane, Basildon / Rochford	REJECTED: The site is within the Greenbelt.
W24	Widdington, Hollow Road, Uttlesford	REJECTED: The site is not considered to be suitable in Highway Terms and/or does not comply with Transport Policy.
W25	Fairfield Road, Fordham Road, Colchester	REJECTED: The site was not considered to be suitable in Highway Terms and/or did not comply with Transport Policy.  This site was withdrawn by the site owner / developer.
W30	Pitsea Landfill, Pitsea Hall Lane, Basildon	REJECTED: The site is within the Greenbelt.

#### Open Air Facilities: Inert Landfill Sites

L(i)5	Sunnymead, Elmstead & Heath Farms, Alresford, Tendring	<p>ALLOCATED: 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</p>
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Site Reference	Site Name / Address	Reason for allocation / rejection
		<p>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	Sandon, Chelmsford	<p>ALLOCATED: 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)10R	Blackley Quarry, Gate Farm Site 1, Chelmsford	<p>ALLOCATED: 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>



Site Reference	Site Name / Address	Reason for allocation / rejection
L(i)15	Fingringhoe Quarry 1, Colchester	<p>ALLOCATED: 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	Dollymans Farm, Doublegate Lane, Basildon / Rochford	<p>ALLOCATED: 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 , with the addition of site L(i)16 Dollymans Farm to meet the shortfall in inert landfill capacity.</p>
L(i)17R	Newport Quarry, Uttlesford	<p>ALLOCATED: 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</p>



Site Reference	Site Name / Address	Reason for allocation / rejection
		inert recycling and inert landfill.
L(n)1R	Slough Farm, Ardleigh – Area 1, Tendring	<p>ALLOCATED: 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	Bellhouse Landfill Site, Warren Lane, Colchester	<p>ALLOCATED: 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>
L(n)7R	Little Bullocks Farm Site A22, Uttlesford	<p>ALLOCATED: 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</p>



Site Reference	Site Name / Address	Reason for allocation / rejection
		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.
L(i)4R	Shellow Cross Farm, Willingale, Chelmsford / Epping	REJECTED: 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.
L(i)13	Wellwick, Martins Farm, St Oysth, Tendring	REJECTED: There is an application for another incompatible use (housing) on the site which is pending.
L(n)8R	Little Bullocks Farm Site A23, Uttlesford	REJECTED: 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.

**Open Air Facilities: Hazardous Landfill Sites**

L(n)8R	Little Bullocks Farm Site A23, Uttlesford	ALLOCATED: 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.
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## 6. The Measures decided concerning Monitoring of the Plan...

### 6.1 Monitoring

The significant sustainability impacts of implementing a Local Plan must be monitored in order to identify unforeseen adverse effects and to be able to undertake appropriate remedial action. Monitoring is intended to provide important feedback on the success of the plan and progress towards its objectives. It can additionally be used to compile baseline information for future revisions of the Plan.

Monitoring should be based on relevant objectives, indicators and targets. Some of these may be related to the objectives of the plan itself, or developed from the earlier stages of the SA. However, additional objectives, targets and indicators may also be required. The appropriate level at which to monitor will depend on the type and scale of the Plan.

The key indicators to monitor as identified through the SA process are identified in the following table alongside each element or policy of the Replacement Waste Local Plan from which sustainability impacts may occur. The monitoring framework in the Replacement Waste Local Plan identifies a current list of indicators that the WPAs have identified for monitoring. It is acknowledged that the following indicators may not all be collectable due to limited resources and difficulty in data availability or collection

**Table 6: The measures identified concerning the monitoring of the RWLP: Identified in the Plan**

Indicators	Related Policy / Strategic Objective
Amount of Local Authority Collected Waste, Commercial, Industrial and CD&E waste diverted from landfill	Strategic Objectives: 1, 2 & 5 Policy 1
Net amount of waste imported/exported per annum	Strategic Objective(s): 4 Policy: 1
Net amount of waste accepted from London	Strategic Objectives: 4 Policy: 1
Transfer, recycling and treatment capacity (tonnes)	Strategic Objectives: 1, 3, 4, 7 & 8. Policy: 1 and 2
Number of safeguarded waste sites redeveloped for other uses (contrary to advice from WPA)	Strategic Objectives: 1, 3, 4, 7 & 8. Policy: 1 and 2
Number of new waste facilities delivered in accordance with site	Strategic Objectives: 3 & 4



Indicators	Related Policy / Strategic Objective
allocations	Policy: 2, 5, 6, 7, 8 & 9
Number of facilities delivered on unallocated sites.	Strategic Objectives: 3 & 4 Policy: 2, 5, 6, 7, 8 & 9
Number of new waste facilities delivered in accordance with Areas of Search designations	Strategic Objectives: 3 & 4 Policy: 2, 5, 6, 7, 8 & 9
Number of waste facilities delivered on non-designated industrial land	Strategic Objectives: 3 & 4 Policy: 2, 5, 6, 7, 8 & 9
Number of planning permissions granted contrary to specialist advice from statutory bodies	Strategic Objectives: 6 Policy: 10, 11
Proposals for waste water treatment capacity are permitted beyond existing Waste Water Treatment Work sites	Strategic Objectives: 3 Policy: 1, 2 & 6
Number of permissions for landraising, which are contrary to policy	Strategic Objectives: 8 Policy: 13

**Table 7: The measures identified concerning the monitoring of the RWLP: Identified in the SA**

SA Objective	Indicator
1) To protect and enhance biodiversity and geological diversity throughout Essex and Southend.	Condition of the nearest (to approved applications) sensitive receptors (where information exists). Including condition of SPAs, SACs, SSSI / Permissions approved / rejected subject to restoration conditions regarding ecologic improvements (LNR, NNR, CWS) / Applications approved subject to ecological assessments regarding flagship, BAP species, known habitats
2) To maintain and enhance water quality and resources.	Ecological status of rivers / Chemical status of rivers / Resource availability status for units of groundwater in Catchment Abstraction Management Strategy Areas / Condition of water bodies (Water Framework Directive) / Developments approved with SuDS
3) To minimise the risk and impact of flooding.	Permissions approved contrary to EA advice / Distance of new facilities to 'Areas susceptible to surface water flooding' – EA



SA Objective	Indicator
	Maps / Developments approved with SuDS
4) To maximise the sustainable use of land and the protection of soils, safeguarding the best and most versatile agricultural land.	Permissions approved on agricultural land grades 1 and 2 / Permissions approved on contaminated land / Permissions approved on PDL
5) To conserve and enhance the historic environment, heritage assets and their settings.	Permissions granted / refused subject to archaeological conditions / The % of planning applications where archaeological mitigation strategies (were developed and implemented) / Applications not granted permission due to impacts on the historic environment (as per policy / policies in the Local Plan) / Number of listed buildings, scheduled monuments, registered parks and gardens, registered battlefields, and % at Risk (all grades) due to waste facility allocation (where information available) / Number of major development projects that detract from the significance of heritage assets or historic landscape character.
6) To minimise the impact on landscape and townscape character.	Developments permitted contrary to Landscape Character Assessment 'sensitivities to change' / Number of TPOs affected by new development / applications refused on impacts on TPO grounds.
7) To protect air quality in the Plan area.	Number of permissions approved within 100m of AQMAs / New AQMAs designated within 100m of facilities (for information – not solely indicative of impact of facility).
8) To maximise energy efficiency, the proportion of energy generated from renewable sources and adaptability to climate change.	Typical energy production (GwH) from Waste facilities / Percentage increases or reductions in waste facilities providing sustainable energy production or products
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.	Waste sent to landfill as a percentage of total waste / Amount of new energy recovery facilities in the Plan Area / Capacity increases regarding biological treatment / Capacity increases of CD&E waste recycling / Capacity increases in dealing with non-hazardous waste.
10) To promote the sustainable transport of waste and materials within Essex and Southend where viable, and to ensure safe highways access where necessary.	Number of developments where a green travel plan is submitted as a condition of development.



SA Objective	Indicator
11) To protect health and well-being in the Plan Area.	Loss / gain of public rights of way / Gain of public open or recreation space through restoration proposals or conditions / Complaints regarding odour (Environmental Health and ECC) / Complaints regarding dust (Environmental Health and ECC).
12) To minimise public nuisance from waste treatment and disposal and from access to and from facilities.	Complaints regarding noise (Environmental Health and ECC) / Conditions to planning applications (including those breached) regarding hours of operation, emission/release parameters, and transport agreements etc / Permissions granted on employment sites / industrial estates.
13) To support economic development in the Plan Area, including jobs arising from waste related activities.	The distances of permissions granted / sites allocated in relation to key centres of growth or towns within the Plan Area / Growth in employment from waste sector.



# Place Services

Essex County Council

County Hall, Chelmsford, Essex CM1 1QH

T: +44 (0)333 013 6840

E: [enquiries@placeservices.co.uk](mailto:enquiries@placeservices.co.uk)

[www.placeservices.co.uk](http://www.placeservices.co.uk)

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