

21 July 2015

Planning and Licensing Committee

Response to the Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan – Revised Preferred Approach June 2015 consultation

Report of: *Gordon Glenday – Head of Planning & Development*

Wards Affected: *All*

This report is: *Public*

1. Executive Summary

- 1.1 The Essex and Southend Replacement Waste Local Plan Revised Preferred Approach is out for public consultation from 18 June to 30 July 2015. The document sets out the preferred approach on a strategy for waste development up until 2032. It proposes to safeguard existing waste capacity, allocate sites suitable for waste facilities and a range of policies to manage waste development.
- 1.2 A number of ‘Strategic Sites’ have been identified to meet the waste capacity needs of Essex and Southend. None have been identified in Brentwood Borough. The consultation document identifies two ‘Areas of Search’ and three ‘Safeguarded Sites’ within Brentwood Borough.
- 1.3 Each of these sites has also been proposed for development in the emerging Brentwood Local Development Plan. It is not considered that identification of these sites as Areas of Search and Safeguarded Sites would cause conflict with the development plan, subject to further discussion with Essex County Council regarding appropriate land uses.

2. Recommendation

- 2.1 That the response to the Essex and Southend Replacement Waste Local Plan Revised Preferred Approach June 2015 consultation as set out in Appendix A of this report be approved**
- 2.2 That the response as set out in Appendix A be agreed and recommended for endorsement by the Environment & Housing Management Committee at its next meeting on 9 September 2015.**

3. Introduction and Background

- 3.1 Essex County Council and Southend-on-Sea Borough Council are jointly preparing a Waste Local Plan. Once adopted the Plan will supersede the existing Essex and Southend Waste Local Plan 2001.
- 3.2 The Replacement Waste Local Plan will set a strategy for waste development up until 2032. Once adopted, the Plan will safeguard existing waste capacity, allocate sites considered suitable for waste facilities, and includes a range of land use-specific and generic policies to manage future waste development. This will form the Waste Plan for Essex and Southend, including Brentwood Borough.
- 3.3 A Preferred Approach was previously published in 2011 but since that time significant changes have occurred resulting in the need for a Revised Preferred Approach. These changes include national policy and legislation, updated local evidence and plan preparation procedural requirements.
- 3.4 A six week public consultation on the Revised Preferred Approach is taking place from 18 June to 30 July 2015.

4. Issue, Options and Analysis of Options

- 4.1 The main aim of the Replacement Waste Local Plan is to continue to support better and more sustainable ways of dealing with waste to further reduce the dependence on landfill. This will be achieved by aiming for net self-sufficiency for all waste streams (where practicable), supporting the provisions of the waste hierarchy and managing a reducing proportion of waste arising from London.
- 4.2 A number of new facilities are needed to enable a more sustainable approach to waste management across the plan period to 2032. This includes provision for additional capacity for biological treatment, inert waste recycling, inert landfill and stable non-reactive hazardous waste disposal.
- 4.3 The preferred approach is to meet the identified waste management capacity requirements by allocating strategic sites. To provide additional flexibility and to cater for possible non-strategic waste requirements (arising locally), the preferred approach is to allocate areas of search. Finally, to guide proposals for waste development on unallocated sites, a range of locational criteria have been included.

- 4.4 An 'Area of Search' encompasses an area within which a suitable waste management facility could be delivered, as opposed to a direct site allocation that represents the exact outline of where a facility is considered to be suitable. The process of identifying Areas of Search has been focused on employment land within industrial estates across the Plan area.
- 4.5 The intention is for these areas of search to act as a guide for waste operators seeking to develop a site within the Plan area, should waste development on the proposed site allocations not come forward. Applications made within these Areas of Search will still require a full planning application which would need to contain precise details of the proposals.
- 4.6 There have been no strategic sites identified within Brentwood Borough but there have been two areas of search identified. These comprise Childerditch Industrial Estate and the industrial estates in West Horndon.
- 4.7 The Areas of Search Assessment identified that having regard to environmental, social and planning criteria, 34 existing employment land areas across the plan area could be suitable for the future development of waste management facilities. Areas were assessed for their suitability under two measures. These included providing sufficient unconstrained land greater than 100m from sensitive receptors (suitable for enclosed facilities) and greater than 250m from sensitive receptors (suitable for enclosed, enclosed thermal or open air facilities).
- 4.8 The Areas of Search Assessment concluded that Childerditch Industrial Estate is suitable for enclosed waste management facilities but not enclosed thermal or open air waste management facilities. For the West Horndon Industrial Estates the Station Road side of the site could accommodate a wider range of waste management facilities where residential properties are not within 250m. The Childerditch Lane side of the site could be suitable for enclosed waste management facilities.
- 4.9 There has also been three existing aggregate recycling facilities within the Borough identified for safeguarding which includes CLC Construction, Childerditch Industrial Estate; Unit A, Codham Hall Farm; and Unit 9, Hallsford Bridge Industrial Estate.
- 4.10 Safeguarding will require Brentwood Borough Council to consult Essex County Council as Waste Planning Authority on any applications for development within 250m of the safeguarded site. 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

- 4.11 The Brentwood Borough Local Plan Strategic Growth Options Consultation January 2015 set out the key planning issues for the Borough over the next 15 years. It also included details of all the proposed development sites within the Borough. No decisions will be made on proposed development sites until publication of the Draft Local Plan later this year.
- 4.12 Childerditch Industrial Estate (LDP Ref: 112A, B, C & D), West Horndon Industrial Estates (LDP Ref: 020 & 021), Land at Codham Hall (LDP Ref 101 A & B) and Hallsford Bridge Industrial Estate (LDP Ref: 113 A & B) were suggested sites in the Brentwood Strategic Growth Options consultation (2015). Childerditch Industrial Estate is proposed to be retained as an employment site with the option of a small extension to the north west. West Horndon Industrial Estate sites were proposed in the Brentwood Local Plan Preferred Options (2013) as housing-led mixed use development, and Land at Codham Hall proposed as a new employment site in the form of an Enterprise Park. Hallsford Bridge Industrial Estate is proposed to retain its existing employment use, as allocated in the Councils current Local Plan.
- 4.13 It is not considered that the identification of the Areas of Search at Childerditch Industrial Estate and the Safeguarded sites at Industrial Estates in Childerditch and Hallsford Bridge would cause conflict with the emerging Brentwood Local Plan, subject to further discussion with Essex County Council regarding appropriate land uses.
- 4.14 If the West Horndon Industrial Estates are identified within the Brentwood Draft Local Plan for redevelopment as housing led mixed use this would mean that their purpose as Areas of Search in the RWLP would no longer be suitable. In relation to Codham Hall Farm there is a possibility that the current aggregate recycling operation would not be appropriate in the context of an Enterprise Park.
- 4.15 The Brentwood Borough Local Plan will need to identify sufficient additional employment land for the plan period. If any of the current employment sites are allocated for alternative use there will need to be additional employment land identified in the Borough to meet future needs which could potentially be appropriate as alternative locations for future waste facilities. These sites, subject to appropriate assessment, may be suitable as alternative locations for future waste facilities.

- 4.16 The preferred approach of the Replacement Waste Local Plan is to meet the identified waste management capacity requirements by allocating strategic sites, none of which are in the Brentwood Borough.
- 4.17 The Areas of Search are intended to act as a guide for waste operators seeking to develop a site within the Plan area, should waste development on the strategic site allocations not be deemed suitable and for non-strategic sites. Safeguarded sites are identified to protect existing waste facilities from incompatible development taking place nearby which could prevent their effective operations.
- 4.18 Brentwood Borough Council will continue to engage with Essex County Council as Waste Planning Authority as each respective Local Plan develops to ensure the development aspirations of each can be met.

5. Reasons for Recommendation

- 5.1 It is not considered necessary to object to the Essex and Southend Replacement Waste Local Plan Revised Preferred Approach consultation on the basis of identifying two Areas of Search and safeguarding three existing aggregate recycling facilities within the Borough.
- 5.2 Principally the preferred approach of the emerging Replacement Waste Local Plan is to meet the waste capacity requirements through strategic allocations (none of which are identified in the Brentwood Borough). The Areas of Search would be an option for waste development should none of the strategic allocations be deemed suitable and for non-strategic sites. Any applications would still be subject to assessment against the appropriate policies of the Waste Local Plan and Brentwood Local Plan.
- 5.3 The Brentwood Borough Local Plan will need to identify sufficient additional employment land for the plan period. If the sites at West Horndon and Codham Hall Farm are allocated there will still need to be additional employment land identified in the Borough to meet future needs which may be suitable as alternative locations for future waste facilities.
- 5.4 The Council supports the main aim of the RWLP to continue to support better and more sustainable ways of dealing with waste, further reduce dependence on landfill and achieve net self-sufficiency for all waste streams.
- 5.5 Once adopted the RWLP will provide a wide ranging strategy with significance across Council services. Feedback has been sought from the Street Scene & Environment Department. It is also recommended that

the Council's response to the RWLP be endorsed by the Environment & Housing Management Committee at its next meeting on 9 September 2015.

6. Consultation

- 6.1 Essex County Council is currently undertaking a six week public consultation on the Revised Preferred Approach from 18 June to 30 July 2015.

7. References to Corporate Plan

- 7.1 The Essex and Southend Replacement Waste Local Plan once adopted will set a waste strategy, policies and allocated sites for the whole of Essex and Southend. This Plan will have a close relationship with the emerging Brentwood Local Development Plan, the production of which is a key priority in the Council's Corporate Plan as part of 'A Prosperous Borough'.

8. Implications

Financial Implications

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- 8.1 None directly arising from this report.

Legal Implications

Chris Potter, Monitoring Officer

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- 8.2 None directly arising from this report.

Other Implications (where significant) – i.e. Health and Safety, Asset Management, Equality and Diversity, Risk Management, Section 17 – Crime & Disorder, Sustainability, ICT.

- 8.3 The overall strategy for waste management in Essex may have implications for the Council's Street Scene & Environment Department in terms of refuse and recycling collection services.
- 8.4 In light of this potential impact across Council services it is recommended that the Council's response to Essex County Council be endorsed by the Environment & Housing Management Committee at its next meeting on 9 September 2015.

9 Background Papers

- 9.3 Essex and Southend-on-Sea Replacement Waste Local Plan Revised Preferred Approach, June 2015.
- 9.4 Replacement Waste Local Plan Revised Preferred Approach – Areas of Search Assessment and Methodology, June 2015.
- 9.5 Both of the above documents and further information can be viewed online at www.essex.gov.uk/wlp

10 Appendices to this report

Appendix A - Brentwood Borough Council letter in response to the Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan Revised Preferred Approach June 2015 consultation.

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