

Brentwood Borough Council response to the Essex County Council and Southend-on-Sea Borough Council Replacement Waste Local Plan Pre-Submission Draft Consultation (March 2016)

Thank you for consulting Brentwood Borough Council on the above consultation. Our response is set out below:

It is considered that the Essex and Southend Replacement Waste Local Plan Pre Submission Draft is Sound and Legally Compliant. However, Brentwood Borough Council would like to raise some further comments on Policy 2 and Policy 4.

Policy 2 – Safeguarding Waste Management Sites and Infrastructure – Waste Consultation Areas

Following a review of Policy 2 and the supporting text in paragraphs 6.7 to 6.13 it is understood that all permitted waste developments are proposed to be safeguarded. Safeguarding will also apply to new sites allocated in the Replacement Waste Local Plan. This will require Local Planning Authorities to consult the Waste Planning Authority on any proposed development including that proposed in Local Plans that is within 250m of a safeguarded site. If the Waste Planning Authority concludes that a proposal within 250m of a safeguarded site would adversely impact on its operation this could give rise to an objection with an expectation the development is not permitted.

It is understood that although all sites set out within the Annual Monitoring Report are safeguarded the safeguarding provisions do not generally apply to non-specialist small scale operations below 10,000 tonnes per annum.

Following a review of the existing permitted sites set out within the Annual Monitoring Report Brentwood Borough Council note that there are eight waste sites proposed to be safeguarded. Of these there are four that we would like to raise comments on. These comprise Childerditch Industrial Estate, Hallsford Bridge Industrial Estate, Codham Hall Farm and Mountnessing Household Waste Recycling Centre (HWRC).

It should be noted that these sites have either been identified as employment land allocations or are adjacent to identified housing allocations as set out within the Brentwood Draft Local Plan 2013-2033. The Draft Local Plan recently undertook a public consultation from 10 February to 23 March 2016 and can be viewed on our website: www.brentwood.gov.uk/localplan. The details of the sites are set out below:

Childerditch Industrial Estate has been identified under Policy 8.4 of the Draft Local Plan as a new employment land allocation (Site Ref: 112D) and an existing employment land allocation (Site Ref: 112A).

Hallsford Bridge Industrial Estate (Site Refs 113A & B) - This has been identified as existing allocated employment land under Policy 8.4 of the Draft Local Plan.

As set out in our previous response to the Revised Preferred Approach it is not considered that the identification of the sites at Childerditch and Hallsford Bridge Industrial Estates within the RWLP as safeguarded waste management sites would conflict with their designation as employment land allocations in the Brentwood Draft Local Plan.

Codham Hall Farm, referred to as Brentwood Enterprise Park (M25 Junction 29 works site) (Site Ref: 101A & 101B). This site comprises the former M25 works site and includes the aggregate recycling operation set out within the RWLP. This has been identified as a proposed employment land allocation under Policy 8.4 of the Draft Local Plan. Policy 8.2 – Brentwood Enterprise Park sets out the planning requirements for the site.

As raised in Brentwood Borough Council's previous response to the RWLP Revised Preferred Approach there is a possibility that the current aggregate recycling operation would not be appropriate in the context of an Enterprise Park. However, it is understood that the aggregate recycling operation at Codham Hall Farm is subject to a temporary planning permission which expires on 30 August 2017. The addition of clause (a) to Policy 2 in the RWLP is welcomed. This explains that the Waste Planning Authority would not object to proposals where;

“a temporary permission for a waste use has expired, or the waste management use has otherwise ceased, and the site or infrastructure is unsuitable for a subsequent waste use”

Brentwood Borough Council considers that this would not therefore conflict with the site being identified in the Draft Local Plan as a new employment land allocation.

Mountnessing HWRC which is proposed to be safeguarded in the RWLP adjoins a housing land allocation site identified in the Brentwood Draft Local Plan. Ingatestone Garden Centre (Site Ref: 128) which adjoins the north eastern boundary of Mountnessing HWRC is proposed to deliver approximately 60 dwellings.

Appropriate consideration will need to be given of the HWRC in any development proposals at Ingatestone Garden Centre. Brentwood Borough Council will work closely with Essex County Council as Waste Planning Authority when consulting on safeguarded waste sites to ensure the aims of both plans are met.

We would like to raise a point regarding the wording of Policy 2. This is not felt to be particularly clear in relation to understanding what the existing permitted sites being safeguarded precisely are. There is reference in paragraph 6.7 that the Annual Monitoring Report (AMR) should be referred to for details of the permitted sites that are safeguarded. However, it does not refer to which part of the AMR nor is this mentioned specifically in the Policy. Whilst the benefit of referring to the AMR is understood in that it would be annually updated, it is felt that it would be clearer to list the safeguarded sites in an appendix to the Replacement Waste Local Plan.

If the AMR is to be relied upon as the only source for permitted waste developments that are safeguarded this needs to be clearly set out. The most recent version of the AMR April 2014 – March 2015 sets out under Appendix G all of the waste facilities by type. However, it would be useful to list them in District/Borough groupings.

Policy 4 – Areas of Search

Policy 4 of the RWLP Pre Submission Draft sets out that proposals for waste management development will be permitted in identified locations. Two existing industrial estates have been identified in the Brentwood Borough. These comprise Childerditch Industrial Estate and West Horndon Industrial Estate.

It should be noted that both of these sites have been identified for development within the Brentwood Draft Local Plan.

Childerditch Industrial Estate has been identified under Policy 8.4 of the Draft Local Plan as a new employment land allocation (Site Ref: 112D) and an existing employment land allocation (Site Ref: 112A). It is not considered that this would conflict with the identification of the site under Policy 4 of the RWLP as an Area of Search.

The West Horndon Industrial Estates on Childerditch Lane and Station Road (Site Refs: 020, 021 & 152) have been identified as housing land allocations under Policy 7.4 for approximately 500 dwellings.

Whilst the Brentwood Draft Local Plan is not at an advanced stage it is considered that this provides a clear indication that should the site be contained within the plan once adopted it would no longer be suitable for waste management uses.

However, the Brentwood Draft Local Plan does identify new employment land allocations under Policy 8.4. These sites subject to appropriate assessment, may be suitable for the locations of future waste facilities.

As work progresses on producing the Brentwood Local Plan Pre Submission we will work closely with Essex County Council as Waste Planning Authority to ensure that the needs and aspirations of both Plans are met.

Thank you for providing the opportunity for Brentwood Borough Council to comment on the Essex and Southend Replacement Waste Local Plan Pre Submission Draft.