

## Replacement Waste Local Plan – Revised Preferred Approach Consultation Questions

### Appendix:-

ISSUE	QUESTION	ANSWER / COMMENT
Vision	1. Do you agree with the 'Proposed Vision'? Please explain your answer.	Yes – it accords with the Waste Hierarchy, the principle of net self-sufficiency, and general planning policy.
Strategic Objectives	2. Do you agree with the 'Proposed Strategic Objectives'? Please explain your answer.	Yes – they add some detail to the Proposed Vision and address the issue of climate change.
Overall Spatial Strategy	3. Do you agree with the 'Overall Spatial Strategy' and Picture 7? Please explain your answer.	Agree with the principle of the Strategy, but the selection of a site in the Green Belt (albeit close to Harlow), and where there are known traffic capacity issues on a busy motorway junction does not accord with the Proposed Vision or with the Strategic Objectives, particularly in terms of facilities being “located, designed and operated to minimise potential adverse impact on the general amenity of local communities, the natural environment, the landscape and the townscape” of the County. Picture 7 in the Consultation document is titled “Existing, Under-Construction (2012) and Allocated Construction, Demolition and Excavations Materials Recovery Facilities”, which is not directly the subject of this section. The question should probably refer to Picture 5, titled “Spatial Portrait of the Plan area (2015)”. This shows, very much in outline, the main settlements of the County and strategic waste facilities – thus Harlow has Municipal Waste on the Templefields site, and Inert Waste Recycling on the Hastingwood site, to which this Council is objecting.
Need for Waste Management Facilities	4. Do you agree with the need to meet the future needs of the Plan area through allocations as set out in this Preferred Approach 1 – dealing with the	Yes – on the assumption that the Waste Capacity Gap figures are correct or as accurate as can be achieved. However, the above reservations remain about the selection of the Hastingwood site.

		need for waste management facilities? Please make reference to evidence base documents as part of your answer.	
Waste Consultation Zones	5.	Do you agree with Preferred Approach 2 – dealing with safeguarding and waste consultation zones? Please explain your answer.	Yes – protection of the strategic waste management sites makes sense in terms of meeting future waste capacity needs, but reservations about the Hastingwood site remain.
Strategic Site Allocations: Local Authority Collected Waste (LACW)	6	Many of the LACW facilities have planning permission and / or are currently operating. The preferred approach to allocate these sites reflects the future potential for the intensification / expansion of waste uses in these locations. Do you agree with Preferred Approach 3? Please explain your answer.	Yes – but this is in the context that none of the sites are within this district.
Strategic Site Allocations: Biological Treatment	7.	Do you agree with the Preferred Approach? Please explain your answer.	No – in the absence of knowledge about the level of consultation which lies behind the RWLP, this Council believes that the WPAs should establish contact with the Lea Valley Glasshouse Industry to examine the potential for waste treatment facilities to serve some of the heat and electricity requirements of the Industry.
Strategic Site Allocations: Inert Waste Recycling	8.	Do you agree with the Preferred Approach? Please explain your answer.	The principle of prioritising sites for biological treatment is accepted because of the problems that can arise from landfilling such waste. Concerns about the identification of the Hastingwood site for inert waste recycling have been expressed above.
Opportunity Site Allocations: Additional Built Waste Management Facilities	9.	Do you agree with the Preferred Approach? Please explain your answer.	Yes – but that is in the context that no Opportunity Site Allocations have been identified in this district.

Strategic Site Allocations: Inert Landfill	10. Do you agree with the Preferred Approach? Please explain your answer.	Yes – but that is in the context that no such sites have been identified in this district.
Strategic Site Allocations: Non-Hazardous Landfill	11. Do you agree with the Preferred Approach? Please explain your answer.	Yes – if there is sufficient capacity it seems pointless to allocate additional sites.
Strategic Site Allocations: Stable Non-Reactive Hazardous Waste Landfill	12. Do you agree with the Preferred Approach? Please explain your answer.	Yes – but that is in the context that no such sites have been identified in the district.
Land raising	13. Do you agree with the Preferred Approach? Please explain your answer.	In principle yes, but there should be an assessment of the relative distances which waste may have to be transported to mineral extraction sites, in comparison with the location of potential landraising sites.
Areas of Search	14. Do you agree with identifying Areas of Search as a means of increasing flexibility with the Plan? Please explain your answer.	Yes – on the basis that, at this stage, (i) the areas are restricted to B2 and B8 areas as identified in current Local Plans; and (ii) that a detailed up-to-date analysis of these areas is carried out, including longer-term intentions which may involve changes of use away from B2 and B8, and which may therefore make waste management and processing uses inappropriate.
Locational Criteria for Enclosed Waste Facilities	15. Do you agree with the locational criteria as set out in Preferred Approach 12? Please explain your answer.	Some make sense, but it is disappointing that no mention is made of the Green Belt and protecting its openness, or of the countryside generally and protecting its character. This could easily apply to the 2 <sup>nd</sup> , 3 <sup>rd</sup> and particularly the 4 <sup>th</sup> bullet points.

ISSUE	QUESTION	ANSWER / COMMENT
Locational Criteria for Open Facilities	16. Do you agree with the locational criteria as set out in Preferred Approach 13? Please explain your answer.	Some make sense, but it is disappointing that no mention is made of the Green Belt and protecting its openness, or of the countryside generally and protecting its character. This could easily apply to the 2 <sup>nd</sup> , 3 <sup>rd</sup> , 4 <sup>th</sup> , 5 <sup>th</sup> and 6 <sup>th</sup> bullet points.
Locational Criteria for intermediate, low and very low Radioactive Waste Facilities	17. Do you agree with the locational criteria as set out in Preferred Approach 14? Please explain your answer.	Yes – but this is in the context that this district is unaffected by the criteria.
Landfill	18. Do you agree with the locational criteria as set out in Preferred Approach 15? Please explain your answer.	Yes – but this is in the context that no sites have been identified in the district.
Mitigating and adapting to Climate Change	19. Do you agree with Preferred Approach 16? Please explain your answer.	Yes – these reflect widely accepted methods of starting to deal with this complex issue.
Transportation of Waste	20. Do you agree with Preferred Approach 17? Please explain your answer.	Yes – this reflects standard planning approaches to dealing with traffic issues and particularly HGV movements. The allocation of the Hastingwood site therefore seems rather perverse in the circumstances.
General considerations for all Waste Management Development Proposals	21. Do you agree with Preferred Approach 18? Please explain your answer.	Yes – these are again mainly quite standard planning issues which can normally be dealt with by conditions on permissions. The draft Plan, however, does not give any detail of how conditions will be enforced and of the resources available to the WPAs to ensure there is adequate enforcement.
Mining of Waste	22. Do you agree with Preferred Approach 19? Please explain your answer.	Yes – it is sensible to address the issue in the event of the process becoming economic as a result of technological advances.
Monitoring Indicators	23.(1) Do you agree with the proposed monitoring and implementation framework for the RWLP? 23.(2) Are there any other indicators that should be included? Please explain your answer.	Yes, but see the answer to the second part of this question.  There is nothing apparent about breaches of planning and other conditions or of enforcement actions and processes.

The final question (24) asks if anything has been missed in the document. Two aspects come to mind, one of which has been referred to earlier: (a) there is no recognition of the Lea Valley Glasshouse Industry and its desire to benefit from heat and electricity sourced from the waste industry – the issue is not straightforward because there would be Green Belt and (possibly) Lee Valley Regional Park implications, but it is undoubtedly a major concern for the Industry, and (b) the Submission version of the document would benefit from a far more comprehensive glossary.

ISSUE	QUESTION	ANSWER / COMMENT
Have we missed anything?	24. Are there any other matters you think should be considered in the RWLP? If yes, please clearly indicate what other matter(s) you would like to see considered and provide reasons for your answer.	