

# REPORT

## **Boston Alternative Energy Facility**

Without Prejudice 'In-Principle' Alternative Locations  
Case

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## 1 Introduction

- 1.1.1 This report provides a “Without Prejudice ‘In-Principle’ Alternative Locations Case” in response to the Royal Society for the Protection of Birds’ (RSPB’s) (REP4-028) and United Kingdom Without Incineration Network’s (UKWIN’s) (REP3-038) comments on the Without Prejudice Habitats Regulations Assessment Derogation Case: Assessment of Alternative Solutions (herein referred to as the “Assessment of Alternative Solutions”) (document reference 9.28, REP2-011) for the Boston Alternative Energy Facility (the Facility). This assessment is in the context of The Conservation of Habitats and Species Regulations 2017 (as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019) (the Habitat Regulations).
- 1.1.2 Section 4.2 of the Assessment of Alternative Solutions (document reference 9.28, REP2-011) includes details of the project need and objectives, with the objectives outlined in Table 5-1. In particular, both RSPB and UKWIN noted that meeting the objectives of skills benefits and employment opportunities in Lincolnshire and Boston (objectives 4 and 5) could equally apply to other regions in the country and therefore there should be further consideration of alternative locations within the UK. Key comments are presented below.
- 1.1.3 RSPB noted *“Whilst we note that objectives 4 and 5 make specific reference to Lincolnshire, we see no reason why the overarching topics they cover (local employment and skills) could not just as easily be considered more widely in terms of locations and solutions to contribute to renewable targets and reductions in carbon emissions. This does not mean that the Application site is not appropriate for development and employment, but that an appropriate level of scrutiny is needed to ensure that any such development is appropriate to the location and its environmental sensitivities, as is required under Habitats Regulations.”*
- 1.1.4 UKWIN noted *“The applicant rules out a facility at an alternative location outside of Lincolnshire in REP2-011 Table 7-2 (‘Screening the long list of potential solutions’) for the primary reason that it would not create jobs in Lincolnshire and Boston (“This option would be contrary to the local objective of providing employment and skills benefits within Lincolnshire and Boston”). The applicant appears to have overlooked the obvious point that locating the proposed facility elsewhere would then support job creation elsewhere in the country - so would still have the benefit of creating jobs - and this would leave the application site available for other uses, which could potentially create yet more jobs. The applicant has not provided a reasonable justification for ruling out the use of one or more alternative locations as an alternative to their current proposal.”*

1.1.5 Within Step 3 of the Assessment of Alternative Solutions the ‘long list’ of potential alternative solutions was screened against the project need and project objectives. The option of alternative locations was screened out for the following reasons (see Table 7-2 in document reference 9.28, REP2-011):

*“This option would be contrary to the local objective of providing employment and skills benefits within Lincolnshire and Boston.*

*In addition, this option would reduce the potential of meeting the following objectives together:*

- *the objective to develop the Facility at a location which aligns with local planning policy; and*
- *to minimise adverse impacts and carbon emissions associated with transportation – which aligns with NPS EN-1 and EN-3.”*

1.1.6 The Applicant stands by the objectives set out in Table 5-1 and therefore the screening out of the alternative locations option. However, in this report, the Applicant presents a without prejudice ‘in-principle’ case that concurs that objectives 4 and 5 (skills benefits and employment opportunities) are potentially deliverable nationwide and therefore, the option of alternative locations is screened in at Step 3 for meeting the project need and objectives. It has been assumed in this case that an alternative location could be identified which also meets the objectives of aligning with local planning policy (objective 8 of Table 5-1 (document reference 9.28, REP2-011)) and using a navigable waterway for transportation of refuse derived fuel (RDF) (objectives 6 and 7 of Table 5-1 (document reference 9.28, REP2-011)).

1.1.7 As a general principle, this is an “assessment alternative locations” only and does not consider alternative options for the design of the Facility which are covered within the Assessment of Alternative Solutions (document reference 9.28, REP2-011). It is acknowledged however within this report that if the Facility were located at an alternative site the design would be adapted to ensure minimal effects to environmental receptors (for example the design of the wharf may differ depending on location).

1.1.8 As set out in Section 4.5 of the Assessment of Alternative Solutions document, Step 4 of the methodology assesses the potential feasibility of each ‘short listed’ potential alternative solution for financial, legal and technical feasibility (Defra, Natural England, Welsh Government and Natural Resources Wales, 2021). This report sets out the equivalent Step 4 assessment for the option of alternative locations.

- 1.1.9 Where potential sites are considered to be feasible under Step 4, Step 5 of the methodology within the Assessment of Alternative Solutions is undertaken which assesses whether any of the alternative location options are acceptable. As noted in the Defra, Natural England, Welsh Government and Natural Resources Wales (2021) guidance, an alternative solution is acceptable if it “is less damaging to the European site and does not have an adverse effect on the integrity of this or any other European site”.
- 1.1.10 As stated in the Assessment of Alternative Solutions, the Applicant considers that the Facility has no Adverse Effect on Integrity (AEI) on The Wash Special Protection Area (SPA) and Ramsar site and The Wash and North Norfolk Coast Special Area of Conservation (SAC). However, Natural England (NE) (and other Interested Parties, including the RSPB and Lincolnshire Wildlife Trust (LWT)) have submitted to the Examining Authority (ExA) that, in their view, AEI cannot be excluded, beyond all reasonable scientific doubt for these sites. Therefore, notwithstanding the Applicant’s position that there will be no AEI for any designated site, this document presents the assessment of alternative locations as part of the case for derogation under the Habitats Regulations on a without prejudice basis to allow for full consideration of all aspects during the Examination.
- 1.1.11 The structure of the report (and how it relates to the methodology of the Assessment of Alternative Solutions (document reference 9.28, REP2-011)) is as follows:
- Section 1 introduces the purpose and scope of this report;
  - Section 2 sets out the methodology adopted by the Applicant for assessing the option of alternative locations;
  - Section 3 presents the assessment which includes the following steps:
    - Section 3.1 (Step 1) sets out an assessment of the study areas considered.
    - Section 3.2 (Step 2) sets out the long list of potential site options based on the methodology set out in Section 2.
    - Section 3.3 (Step 3) assesses the long list of potential site options against planning considerations including local plan allocations, waste local plan context and current planning or DCO applications for each option. This step is provided in order to assess whether the options are “potentially feasible” as per Step 4 of the Assessment of Alternative Solutions (document reference 9.28, REP2-011).
    - Section 3.4 (Step 4) is the final step which considers if any of the short-listed options have the potential for a lesser, equal or greater

impact upon the national site network (and/or on Ramsar sites) compared to the Facility. This step is equivalent to Step 5 within the Assessment of Alternative Solutions (document reference 9.28, REP2-011).

- Section 4 concludes the outcomes of the assessment.

## 2 Methodology

### 2.1 Step 1: Assessing Geographical Scope and Study Areas

2.1.1 The first stage of the process of assessing alternative locations considers the geographical scope of the assessment. Although a national scheme, the location of the study area is considered to be required to be in good proximity to the highest proportion of waste arisings in the UK (and readily accessible by sea). Locating the Facility in an area remote from where the highest waste arisings occur in the UK would be uneconomic and unworkable. Therefore, the geographical extent of the alternative locations study area is defined based on this assumption.

2.1.2 In addition, it is a requirement of the Facility to connect into a grid connection point that has the ability to accept a generation capacity of at least 80 megawatts (MW). Therefore, sites have only been considered in close proximity to a grid connection point with this capacity. Buffer zones have been established around the available grid connection points at the furthest extent that a cable route would be considered from the Facility, the buffer zones have been set at 10km from the grid connection points with the reasoning provided in **Section 3.1**. As a general principle, the assessment has considered sites which are adjacent to an accessible waterway in order to satisfy this important objective of the scheme (objectives 6 and 7 of Table 5-1 (document reference 9.28, REP2-011)).

### 2.2 Step 2: Long list of options

2.2.1 Following establishment of the study areas, all available land has been identified which does not contain existing infrastructure (i.e. land which has not been developed).

2.2.2 Once undeveloped sites have been identified, other physical constraints are considered comprising:

- Sites constrained by location within a national site network (and/or Ramsar) site, which would lead to direct, negative effects upon the site;
- Sites constrained by the need for cabling which would pass under/ over large bodies of water or residential areas and commercial properties (> approx. 1km) which would be unworkable for drilling/overhead cables; and
- Sites constrained by previous use as landfill, which would lead to significant engineering and health and safety risks.

2.2.3 It has been assumed that the area of land required will be the same as that required to support the Facility (25.3 hectares (ha)), excluding the habitat



mitigation area) and, therefore, sites less than 25 ha in area have been scoped out.

2.2.4 Following this process generates a long list of options for further assessment.

## 2.3 Step 3: Short list of options

2.3.1 Following the development of a long list of options, a short list of options has been identified based on whether the option areas available for development are supported by an appropriate local plan allocation and waste local plan context. Only land with a suitable employment/ waste management or energy generation-based allocation has been scoped in. If a site has a relevant employment / waste management or energy-based land use allocation, the planning portal for the relevant local authority and the National Infrastructure Planning website have been checked to ensure no other development is planned for that area. Sites scoped into the short list are considered to be potentially feasible site options.

## 2.4 Step 4: Short list options assessment

2.4.1 The final step considers if any of the short-listed options have the potential for a lesser, equal or greater impact upon the national site network (and/or on Ramsar sites) than the Facility (as per Defra, Natural England, Welsh Government and Natural Resources Wales (2021) guidance).

### 3 Assessment of Alternative Locations

#### 3.1 Step 1: Assessing Geographical Scope and Study Areas

##### Geographical Scope

3.1.1 In comparison with Northern Ireland, Scotland and Wales, England has the highest quantity of available combustible waste (as per section 2.6 of the Addendum to Fuel Availability and Waste Hierarchy (document reference 9.5, REP1-018)). Within England, the highest levels of waste inputs to landfill and potentially combustible waste inputs to landfill originate from the East of England and the South East (Environment Agency, 2019). This data is set out in Table 2-1 and Table 2-2 of document reference 9.5, REP1-018. The indicative UK ports to be utilised for transfer of Refuse Derived Fuel to the Facility are reproduced below in **Table 3-1**. As shown below, within England five out of the seven ports identified are within the East of England / South East area, with Hartlepool also being on the east coast of England.

**Table 3-1 Indicative UK Port Locations Proposed for Waste Transportation**

Country	Region	Port
England	North East	Hartlepool
	North West	Fleetwood
	Yorks. & Humber	Hull
	East Midlands	N/A
	West Midlands	N/A
	East of England	Great Yarmouth
	London	N/A
	South East	Ridham Sheerness Southampton
	South West	N/A
Northern Ireland	N/A	Belfast
Scotland	N/A	Glasgow Montrose Grangemouth
Wales	N/A	Port Talbot

Source: APP-043, 6.2.5 Environmental Statement - Chapter 5 - Project Description, Section 5.6

- 3.1.2 Therefore, the following regions are considered to be appropriate for a development of the nature of the Boston Alternative Energy Facility due to their proximity to the highest levels of waste arisings that would provide feedstock: East Midlands, East of England, London and the South East. Specifically, this includes: East Yorkshire adjacent to the Humber, Lincolnshire (including the Humber), Norfolk, Suffolk, Essex, Kent, East Sussex, West Sussex, Hampshire and London adjacent to the Thames.
- 3.1.3 Within the Thames estuary, the Littlebrook connection location was the most westerly national grid connection location considered, as further upstream towards the centre of London, there is physically only limited land available which would be suitable for EfW development. Additional concerns with developing near/in large urban areas, and further up-estuary restrictions with bridges, also reduce the acceptability of locating the Facility closer to the centre of London.

### Grid Connection Points

- 3.1.4 The Facility is based on a site which includes an on-site grid connection with no need for an additional cable route. However, for an alternative location it is assumed a cable route may need to be provided to a suitable national grid connection location. Using data from the National Grid (National Grid, 2022) and assuming a generation capacity of 80MW, all available grid connection sites were identified within the regions highlighted. The distances of the available grid connection sites to the nearest navigable and suitably sized waterway (e.g. estuary or coastal area) were calculated as shown in **Table 3-2**.

**Table 3-2 Available National Grid Connection Locations and Distances to Nearest Accessible Waterway**

National Grid Connection Location	Distance to Nearest Coastal/Estuary Area (km)
Fawley 132kV	0
Fawley 400kV	0
Kingsnorth 132kV	0
Kingsnorth 400kV	0
Littlebrook 400kV	0
Marchwood 400kV	0
Saltend North 275kV	0
South Humber Bank 400kV	0
Spalding North 400kV	0
Tilbury 275kV	0.1
Tilbury 400kV	0.1
Coryton South 400kV	0.3
Kemsley (Sheerness) 400kV	0.3
Grain 400kV	0.5
Killingholme 400kV	0.5

National Grid Connection Location	Distance to Nearest Coastal/Estuary Area (km)
Humber Refinery 400kV	0.9
Northfleet East 400kV	1.5
Lovedean 400kV	6.9
Warley 275kV	7.9
Bicker Fen 400kV	11.3
Brimsdown 132kV	11.8
Mill Hill 132kV	12.6
Mill Hill 275kV	12.6
West Weybridge 400kV	13
Waltham Cross 400kV	16.7
Watford South 275kV	18
Thornton 400kV	18.5
Elstree 132kV	18.6
Elstree 275kV	18.6
Elstree 400kV	18.6
Rye House 400kV	21.2
Fleet 400kV	38
Wymondley 400kV	45
Bramley 400kV	47.6
<b>Average</b>	<b>10.03</b>

3.1.5 Several constraints were considered when deciding on a buffer distance from a potential development site and a grid connection point:

- Environmental risk – longer cable routes increase the likelihood of significant impacts.
- Engineering risk – interactions with physical constraints such as woodlands, waterways, roads and rail increase with a longer cable route.
- Land use requirement – longer cable routes potentially require more compulsory acquisition and consenting risk.
- Financial considerations associated with longer routes associated with rights acquisition costs, legal and advisory costs and higher overall capital and operational costs.

3.1.6 Taking into account the above considerations the Applicant has determined that 10km would be an appropriate buffer from a grid connection location, which would be fundable and present an acceptable consenting challenge. Distance is a very useful proxy for environmental and consenting risk with reduction in cable route length a key aspiration in energy projects, noting that a scheme generating 80MW for export to the grid is less able to finance the long overland grid connections associated with the offshore wind farm sector where generating capacity is of the order of 1GW. The huge number of objections from the public to recent offshore

wind DCO applications on the basis of (inter alia) cable routes is evidence that long cable routes are to be avoided from a public acceptability point of view, and where a developer has the potential to avoid such long cable routes they should absolutely do so.

- 3.1.7 The study areas, available grid connection locations and associated 10km buffers are shown in **Figure 3-1** and **Figure 3-2**.

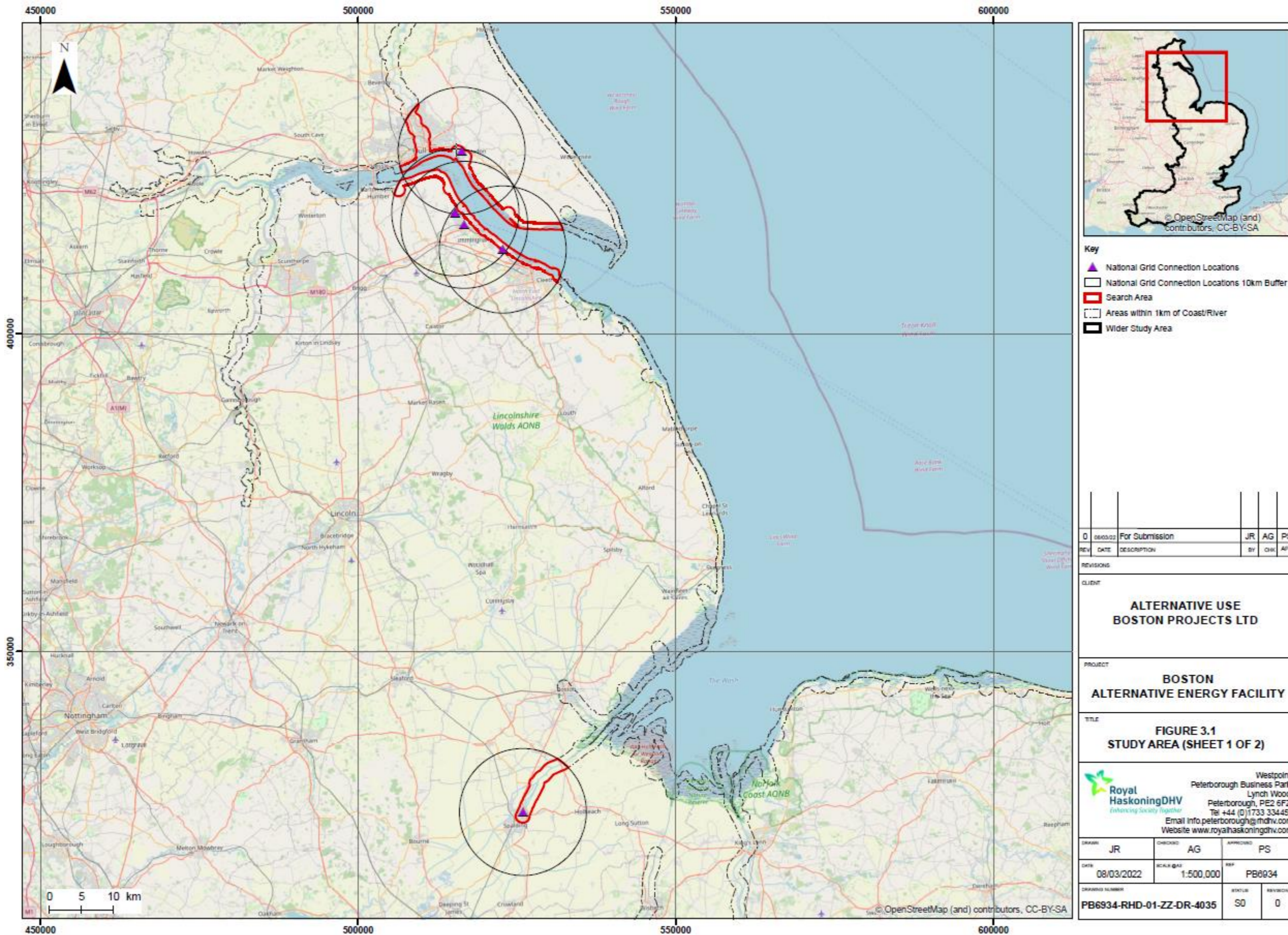


Figure 3-1 Study area (sheet 1)

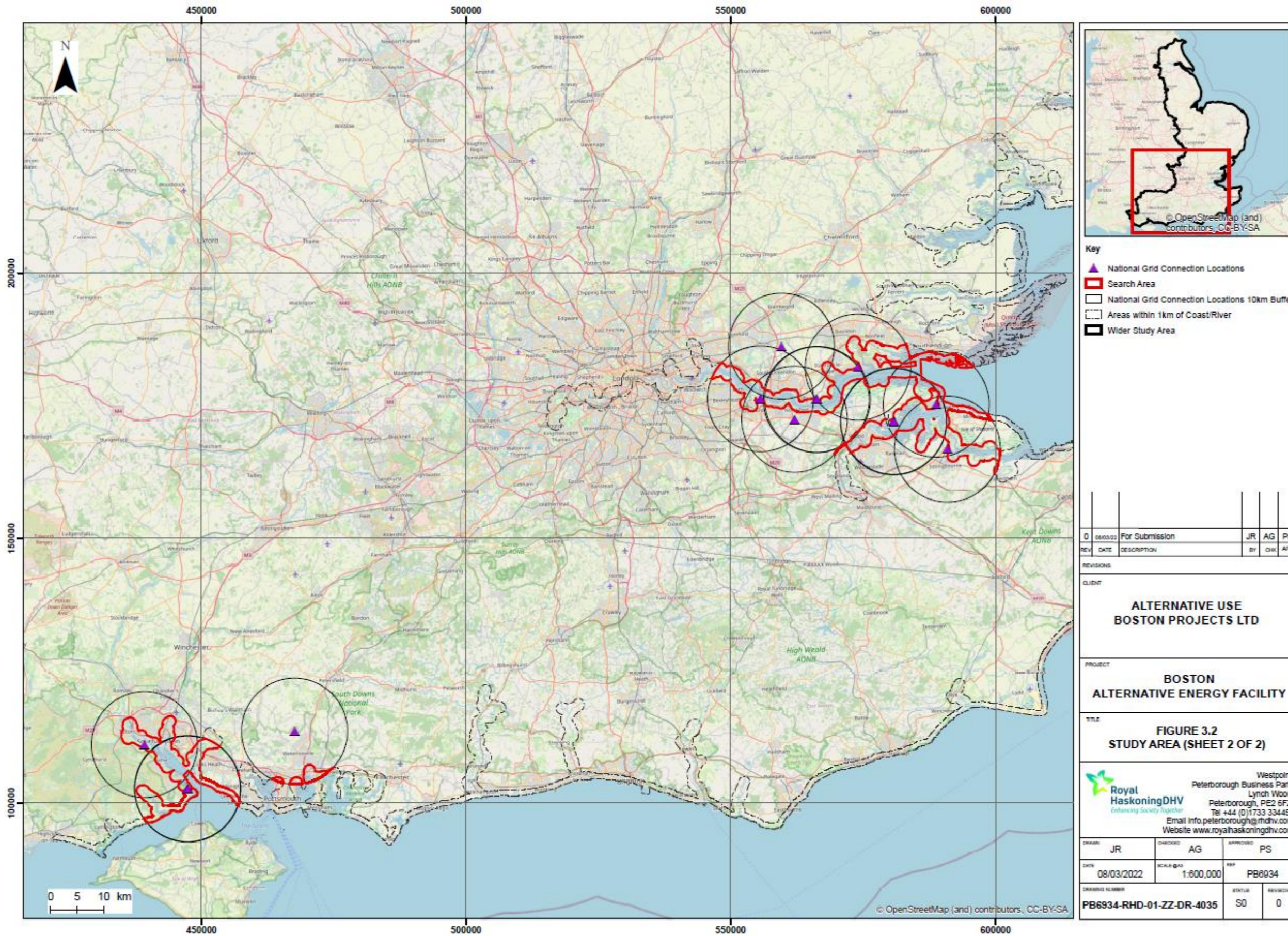


Figure 3-2 Study area (sheet 2)

## 3.2 Step 2: Long list of options

- 3.2.1 Applying the methodology in **Section 2.2** a long list of sites has been identified for site locations with an area of at least 25 ha, which take into account physical constraints (e.g. current infrastructure). This long list of sites is shown in **Figure 3-3, Figure 3-4, Figure 3-5** and **Figure 3-6**.



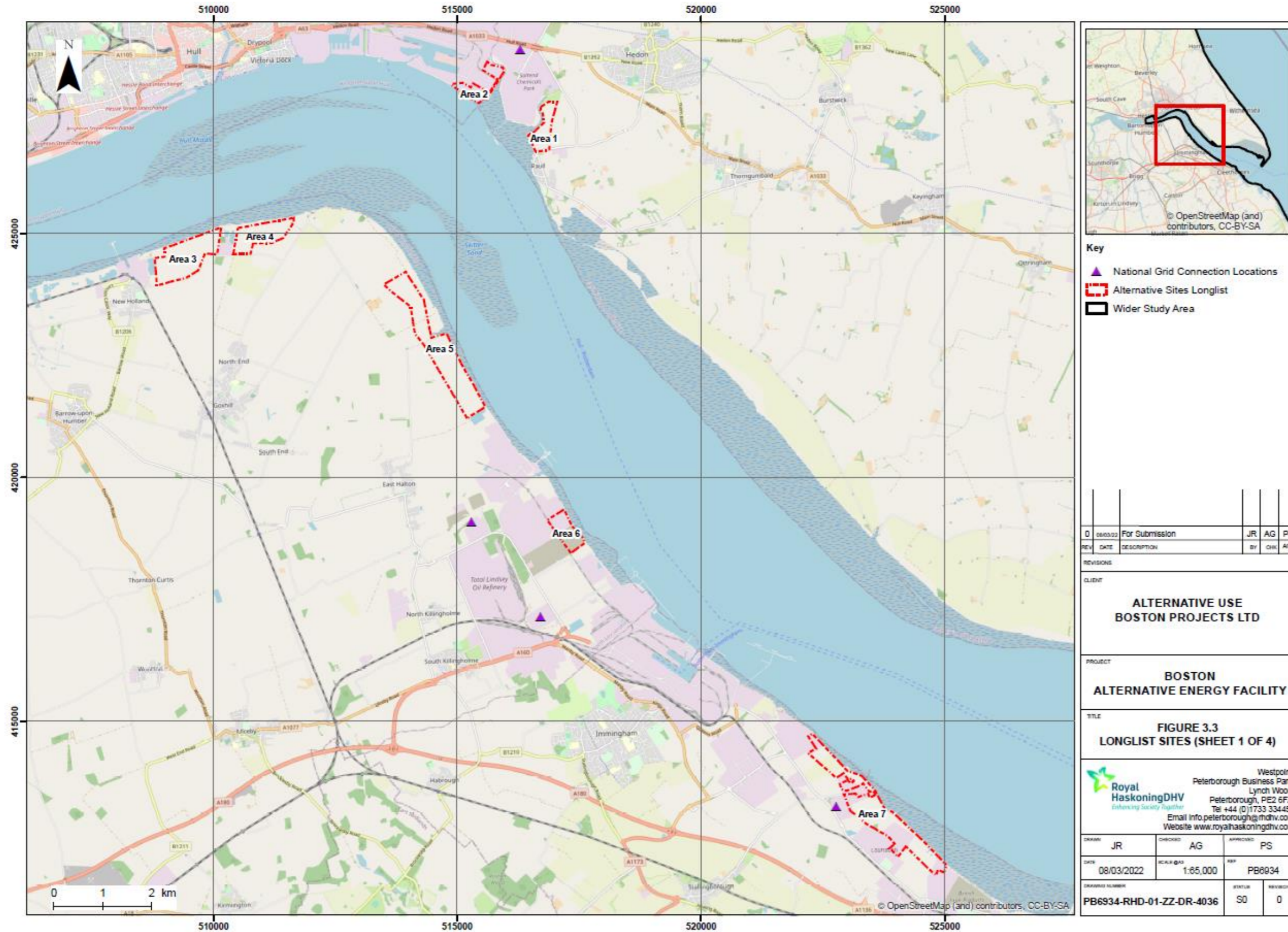


Figure 3-3 Longlist sites (sheet 1 of 4)

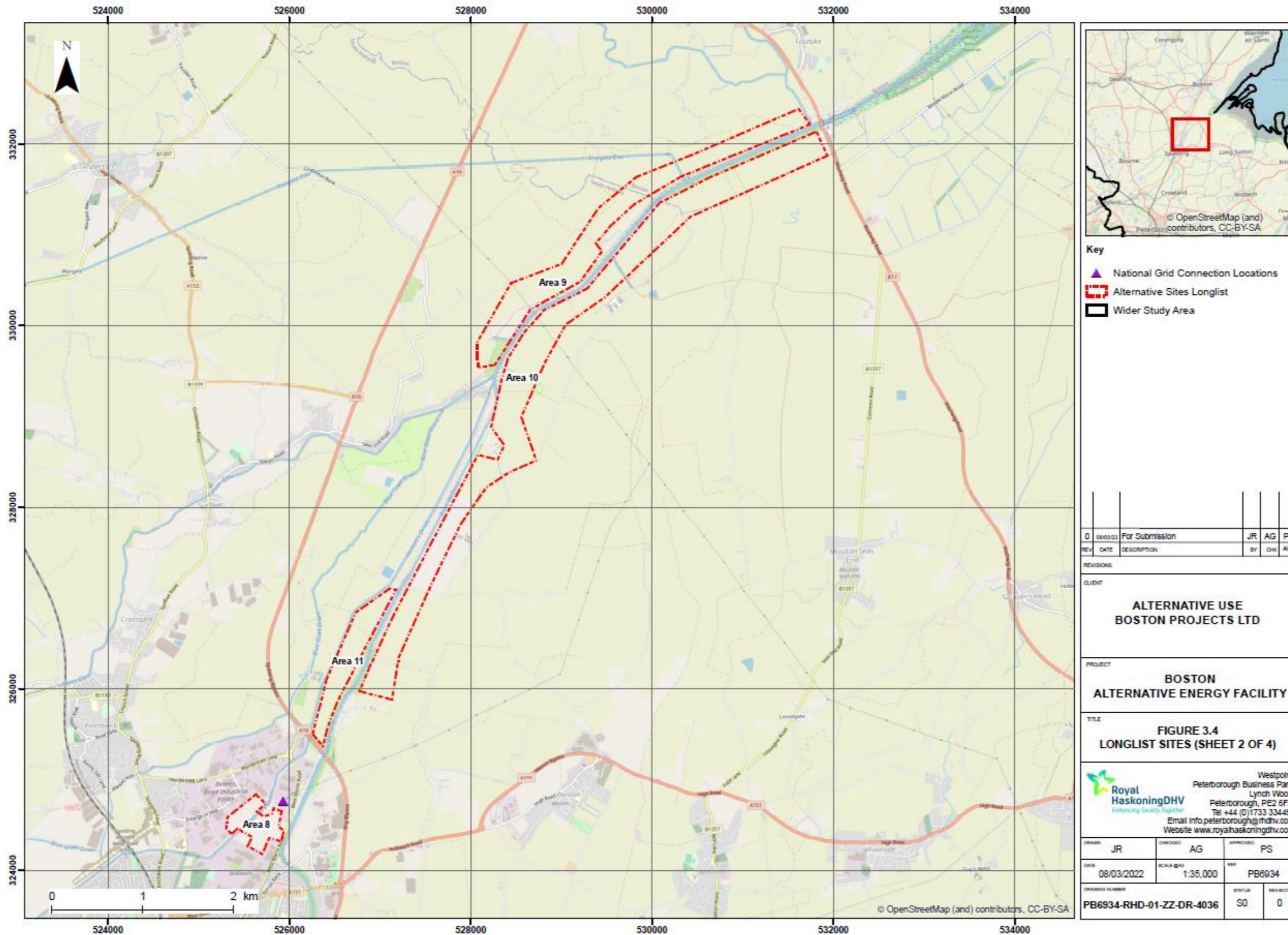


Figure 3-4 Longlist sites (sheet 2 of 4)

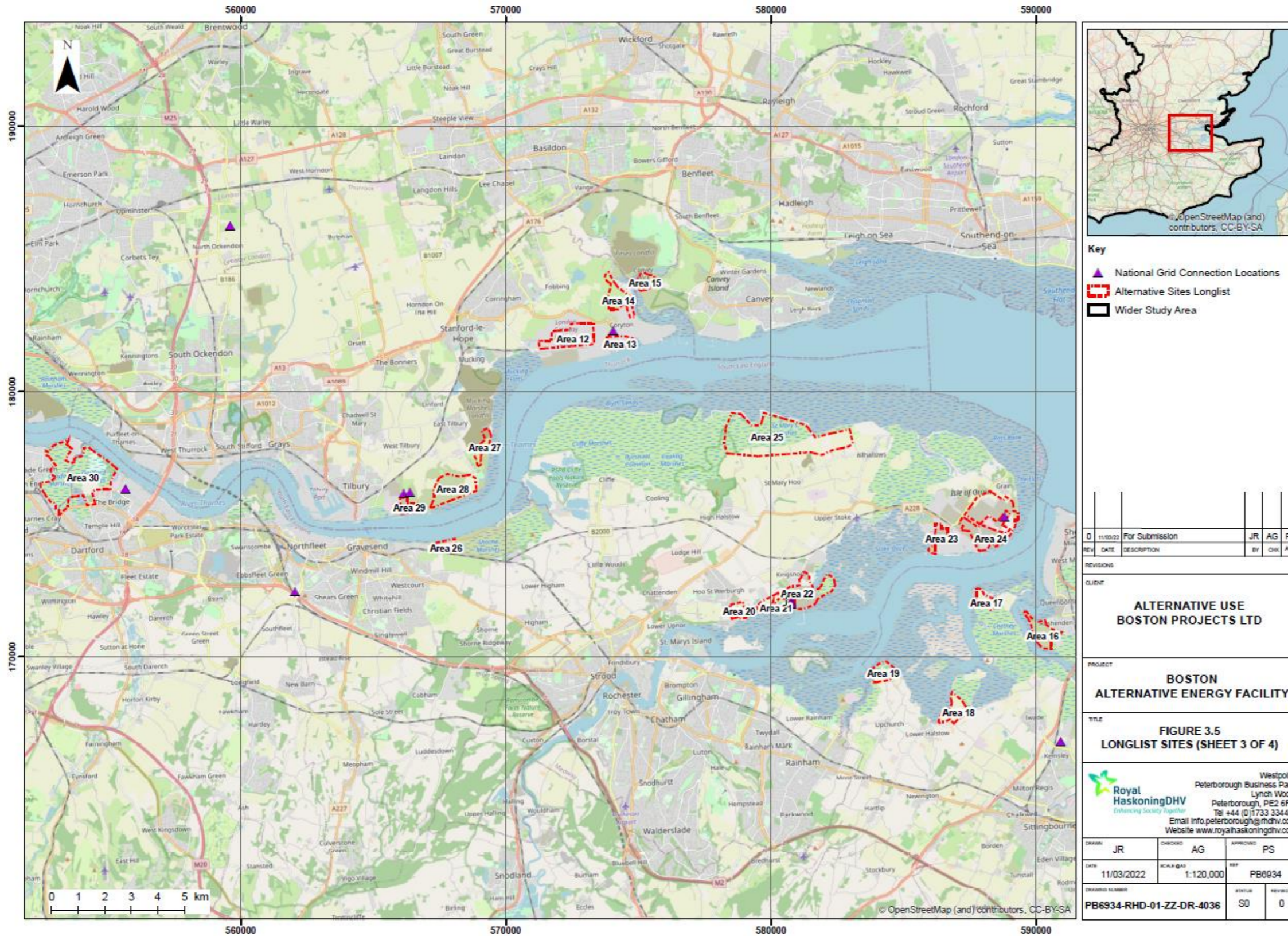


Figure 3-5 Longlist sites (sheet 3 of 4)

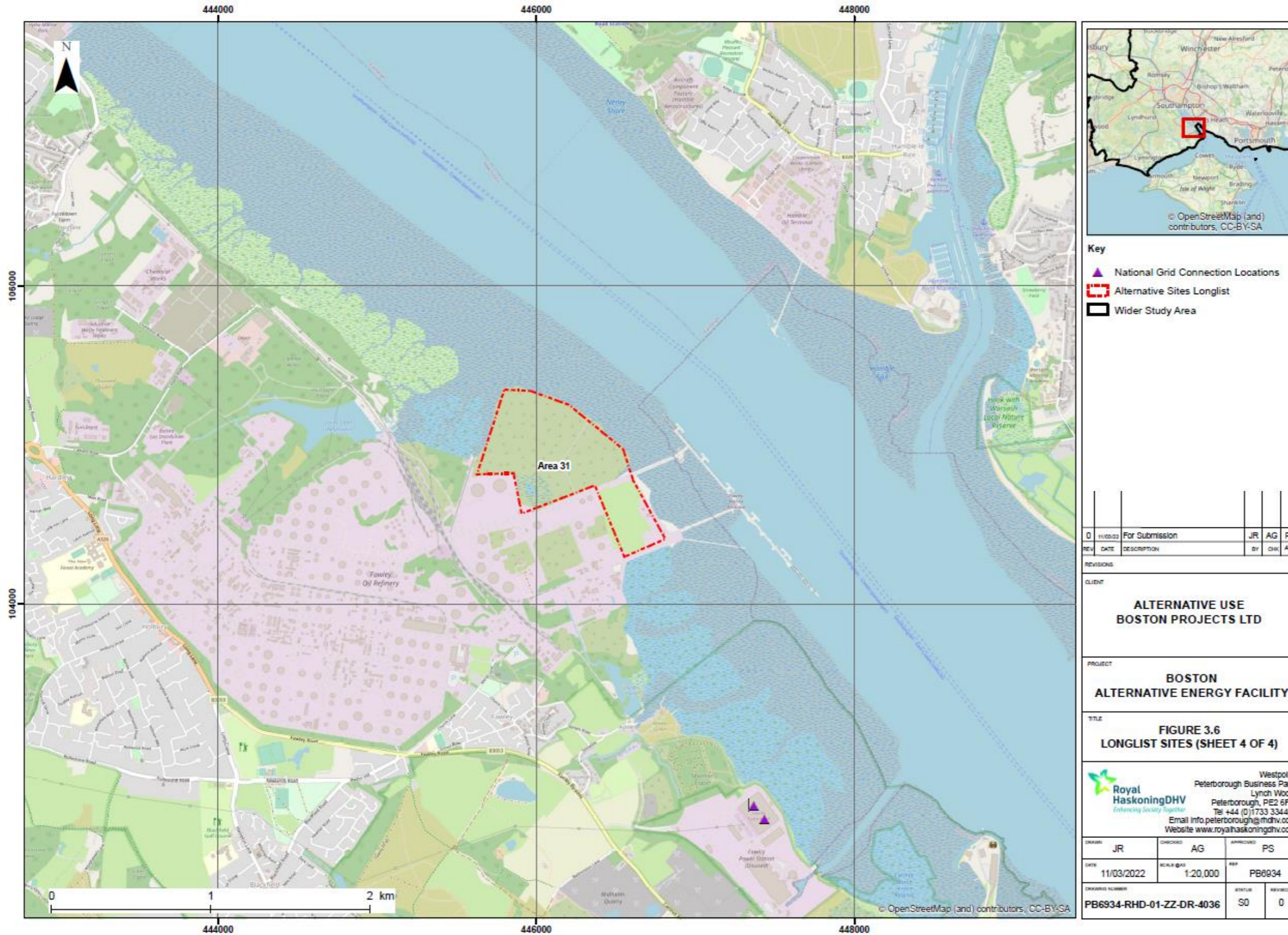


Figure 3-6 Longlist sites (sheet 4 of 4)

### 3.3 Step 3: Option short-listing

#### Options screening – planning considerations

3.3.1 **Table 3-3** outlines the local plan allocations and waste local plan context for the long list of site options. Where a new local plan is to be adopted in the near future (either in 2022 or 2023), potential allocations have been considered alongside those of the corresponding adopted local plan. As per the methodology in **Section 2.3**, sites have only been scoped in where the land is allocated for employment, waste management development or energy development relevant to EfW. If a site has a relevant employment / waste management or energy-based land use allocation, the planning portal for the relevant local authority and the National Infrastructure Planning website have been checked to ensure no other development is planned for that area. Sites which have been scoped in form the 'short list' of options which are considered to be potentially feasible options.

**Table 3-3 Option screening and short listing**

No.	Land allocation or current planning/ DCO application	Local plan	Scope in/ out
Area 1	<p>Key Employment Site EC1. Policy HAV-A Hedon Haven allocated for the expansion of the Port of Hull (East Riding Local Plan 2012 – 2029 (Allocations Document)).</p> <p>The Joint Waste Plan for Hull and East Riding 2004 notes that the preferred location for waste management development is on previously developed land. If this is not feasible, development on undeveloped land within existing urban areas is the next preference.</p>	<p>East Riding Local Plan 2012 – 2029</p> <p>Joint Waste Plan for Hull and East Riding 2004</p>	<p>Scoped out</p> <p>This site is allocated for the expansion of the Port of Hull (East Riding Local Plan 2012 – 2029 (Allocations Document)) therefore would not be suitable for an EfW development.</p>
Area 2	<p>Employment allocation (Policy 2) allocated for a range of uses within industrial and business</p>	<p>Hull Local Plan 2016-2032</p>	<p>Scoped out</p>

No.	Land allocation or current planning/ DCO application	Local plan	Scope in/ out
	<p>use under Use Classes B1(b) (c) and B2 and B8. This site is allocated for uses linked to Green Port Hull (offshore wind manufacturing and distribution).</p> <p>The Joint Waste Plan for Hull and East Riding 2004 notes that the preferred location for waste management development is on previously developed land. If this is not feasible, development on undeveloped land within existing urban areas is the next preference.</p>	<p>Joint Waste Plan for Hull and East Riding 2004</p>	<p>This site is allocated for uses linked to Green Port Hull (offshore wind manufacturing and distribution) therefore would not be suitable for an EfW development.</p>
Area 3	<p>No allocations under The North Lincolnshire Local Plan (2003) (adopted)</p> <p>Allocated as brick clay safeguarding, no other designations under the North Lincolnshire Local Plan (to be adopted in 2023).</p> <p>This site is not an allocated waste area within the Lincolnshire Minerals and Waste Local Plan 2016, Site Allocations Document.</p> <p>The Lincolnshire Minerals and Waste Core Strategy and Development Management Policies document notes within Policy W3: Proposals for new waste facilities, outside the above areas [main urban areas] will only be permitted where they are:</p>	<p>The North Lincolnshire Local Plan (2003) (adopted)</p> <p>North Lincolnshire Local Plan (to be adopted in 2023)</p> <p>Lincolnshire Minerals and Waste Local Plan 2016 Site Allocations Document</p> <p>The Lincolnshire Minerals and Waste Core Strategy and Development Management Policies Document 2016.</p>	<p>Scoped out</p> <p>This site is not allocated for employment use within the North Lincolnshire Local Plan Stage 4 (Publication Draft) (to be adopted in 2023) and is not allocated as a waste area within the Lincolnshire Minerals and Waste Local Plan 2016. The use of the site for energy from waste purposes is considered to be contrary to Policy W3 of The Lincolnshire Minerals and Waste Local Plan (2016).</p>

No.	Land allocation or current planning/ DCO application	Local plan	Scope in/ out
	<ul style="list-style-type: none"> <li>• facilities for the biological treatment of waste including anaerobic digestion and open-air windrow composting (see Policy W5);</li> <li>• the treatment of waste water and sewage (see Policy W9);</li> <li>• landfilling of waste (see Policy W6);</li> <li>• small scale waste facilities (see Policy W7).</li> </ul>		
Area 4	<p>No allocations under The North Lincolnshire Local Plan (2003) (adopted)</p> <p>Allocated as brick clay safeguarding, no other designations under the North Lincolnshire Local Plan (to be adopted in 2023).</p> <p>This site is not an allocated waste area within the Lincolnshire Minerals and Waste Local Plan 2016, Site Allocations Document.</p>	<p>The North Lincolnshire Local Plan (2003) (adopted)</p> <p>North Lincolnshire Local Plan (to be adopted in 2023)</p> <p>Lincolnshire Minerals and Waste Local Plan 2016 Site Allocations Document</p> <p>The Lincolnshire Minerals and Waste Core Strategy and Development Management Policies Document 2016.</p>	<p>Scoped out</p> <p>This site is not allocated for employment use within the North Lincolnshire Local Plan Stage 4 (Publication Draft) (to be adopted in 2023) and is not allocated as a waste area within the Lincolnshire Minerals and Waste Local Plan 2016. The use of the site for energy from waste purposes is considered to be contrary to Policy W3 of The Lincolnshire Minerals and Waste Local Plan (2016).</p>
Area 5	<p>Proposed Industry (The North Lincolnshire Local Plan (2003))</p> <p>The southern area (approx. 80 ha) of this site is allocated within the Spatial Strategy (to be adopted in 2023) as "Mitigation Area".</p>	<p>The North Lincolnshire Local Plan (2003) (adopted)</p> <p>North Lincolnshire Local Plan Stage 4 (Publication Draft) (to be adopted in 2023)</p> <p>Lincolnshire Minerals and Waste Local Plan 2016 Site Allocations Document</p>	<p>Scoped out</p> <p>This site is not allocated for employment use within the North Lincolnshire Local Plan Stage 4 (Publication Draft) (to be adopted in 2023) and is not allocated as a waste area within the Lincolnshire Minerals</p>

No.	Land allocation or current planning/ DCO application	Local plan	Scope in/ out
	<p>The northern area (approx. 50ha) of this site includes the policy are DQE11: Green Infrastructure Network for multifunctional green space.</p> <p>This site is not an allocated waste area within the Lincolnshire Minerals and Waste Local Plan 2016, Site Allocations Document.</p>	<p>The Lincolnshire Minerals and Waste Core Strategy and Development Management Policies Document 2016.</p>	<p>and Waste Local Plan 2016. The use of the site for energy from waste purposes is considered to be contrary to Policy W3 of The Lincolnshire Minerals and Waste Local Plan (2016).</p>
<p>Area 6</p>	<p>Proposed Industry (The North Lincolnshire Local Plan (2003))</p> <p>Allocated as Policy EC4p: South Humber Bank Landscape Initiative. Allocated as Policy SS9p: Strategic Site Allocation - South Humber Bank for B1, B2 and B8 industrial land uses and ancillary development associated with port activities and energy generation proposals (North Lincolnshire Local Plan (to be adopted in 2023)).</p> <p>Able Marine Energy Park has an approved DCO for this site.</p> <p>This site is not an allocated waste area within the Lincolnshire Minerals and Waste Local Plan 2016, Site Allocations Document.</p>	<p>The North Lincolnshire Local Plan (2003) (adopted)</p> <p>North Lincolnshire Local Plan (to be adopted in 2023)</p> <p>Lincolnshire Minerals and Waste Local Plan 2016 Site Allocations Document</p> <p>The Lincolnshire Minerals and Waste Core Strategy and Development Management Policies Document 2016.</p>	<p>Scoped out</p> <p>This site is scoped out as Able Marine Energy Park (which has the benefit of a Development Consent Order) is expected to be developed out once a material change to the DCO has been granted.</p>



No.	Land allocation or current planning/ DCO application	Local plan	Scope in/ out
Area 7	<p>Habitat Mitigation – Proposed Managed; Employment - Existing Employment Area; small area of Proposed Employment (North East Lincolnshire Local Plan 2013 to 2032 (Adopted 2018)).</p> <p>This site is not an allocated waste area within the Lincolnshire Minerals and Waste Local Plan 2016, Site Allocations Document.</p>	<p>North East Lincolnshire Local Plan 2013 to 2032 (Adopted 2018)</p> <p>Lincolnshire Minerals and Waste Local Plan 2016 Site Allocations Document</p> <p>The Lincolnshire Minerals and Waste Core Strategy and Development Management Policies Document 2016.</p>	<p>Scoped out</p> <p>This site is scoped out as the Habitat Mitigation Areas would reduce the area of potential developable land to smaller than that required for the Facility (i.e., &lt;25ha)</p>
Area 8	<p>Proposed Main Employment area (Policy 7) also SP001 (7.5 ha). Proposed Restricted Use Site SP038 (12.5 ha) – designated for Spalding Power Station B (South East Lincolnshire Local Plan 2011-2036).</p> <p>This is allocated within the Lincolnshire Minerals and Waste Local Plan 2016, Site Allocations Document as an allocated waste areas with potential uses including: Resource Recovery Park, Treatment Facility, Waste Transfer, Materials Recycling Facility, Household Waste Recycling Centre, Re-Use Facility, Energy Recovery.</p>	<p>South East Lincolnshire Local Plan 2011-2036</p> <p>Lincolnshire Minerals and Waste Local Plan 2016, Site Allocations Document</p> <p>The Lincolnshire Minerals and Waste Core Strategy and Development Management Policies Document 2016.</p>	<p>Scoped out</p> <p>Half of this site is designated for Spalding Power Station B (South East Lincolnshire Local Plan 2011-2036) leaving only 7.5 ha of available land, which would be insufficient for the Facility.</p>
Area 9	<p>Countryside (South East Lincolnshire Local Plan 2011-2036)</p>	<p>South East Lincolnshire Local Plan 2011-2036</p> <p>Lincolnshire Minerals and Waste Local Plan 2016 Site Allocations Document</p>	<p>Scoped out</p> <p>This site is wholly located within an area designated as Countryside and is not allocated for waste</p>

No.	Land allocation or current planning/ DCO application	Local plan	Scope in/ out
	This site is not an allocated waste area within the Lincolnshire Minerals and Waste Local Plan 2016, Site Allocations Document.	The Lincolnshire Minerals and Waste Core Strategy and Development Management Policies Document 2016.	management use within the minerals and waste local plan. The use of the site for energy from waste purposes is considered to be contrary to Policy W3 of The Lincolnshire Minerals and Waste Local Plan (2016).
Area 10	<p>Countryside (South East Lincolnshire Local Plan 2011-2036)</p> <p>This site is not an allocated waste area within the Lincolnshire Minerals and Waste Local Plan 2016, Site Allocations Document.</p>	<p>South East Lincolnshire Local Plan 2011-2036</p> <p>Lincolnshire Minerals and Waste Local Plan 2016 Site Allocations Document</p> <p>The Lincolnshire Minerals and Waste Core Strategy and Development Management Policies Document 2016.</p>	<p>Scoped out</p> <p>This site is wholly located within an area designated as Countryside and is not allocated for waste management use within the minerals and waste local plan. The use of the site for energy from waste purposes is considered to be contrary to Policy W3 of The Lincolnshire Minerals and Waste Local Plan (2016).</p>
Area 11	<p>Countryside (South East Lincolnshire Local Plan 2011-2036)</p> <p>This site is not an allocated waste area within the Lincolnshire Minerals and Waste Local Plan 2016, Site Allocations Document.</p>	<p>South East Lincolnshire Local Plan 2011-2036</p> <p>Lincolnshire Minerals and Waste Local Plan 2016 Site Allocations Document</p> <p>The Lincolnshire Minerals and Waste Core Strategy and Development Management Policies Document 2016.</p>	<p>Scoped out</p> <p>This site is wholly located within an area designated as Countryside and is not allocated for waste management use within the minerals and waste local plan. The use of the site for energy from waste purposes is considered to be contrary to Policy W3 of The Lincolnshire Minerals and Waste Local Plan (2016).</p>

No.	Land allocation or current planning/ DCO application	Local plan	Scope in/ out
Area 12	<p>Sustainable Employment Growth (CSSP2) and Strategic Employment Provision (CSTP6).</p> <p>This area is not allocated as a strategic site allocation or an area of search within the Essex and Southend on Sea Waste Local Plan 2017. There is a strong preference for waste development to be delivered on site allocations and Areas of Search before alternative (unallocated) locations are considered. Policy 5 of the Essex and Southend on Sea Waste Local Plan 2017 should be considered as set out below.</p> <p>Policy 5 - Enclosed Waste Facilities on unallocated sites or outside Areas of Search notes proposals for new enclosed waste management facilities will be permitted where:</p> <ol style="list-style-type: none"> <li>1. the waste site allocations and the Areas of Search in this Plan are shown to be unsuitable or unavailable for the proposed development;</li> <li>2. although not exclusively, a need for the capacity of the proposed development has been demonstrated to manage waste arising from within the administrative areas of Essex and Southend-on-Sea; and</li> <li>3. it is demonstrated that the site is at least as suitable for such development as Site</li> </ol>	<p>Thurrock Council Core Strategy and Policies for Management of Development (2015)</p> <p>Essex and Southend on Sea Waste Local Plan 2017</p>	<p>Scoped out</p> <p>This area is scoped out due to the LDO for London Gateway Logistics Park which covers this site.</p>

No.	Land allocation or current planning/ DCO application	Local plan	Scope in/ out
	<p>Allocations or Areas of Search, with reference to the overall spatial strategy and site assessment methodology associated with this Plan.</p> <p>In addition, proposals should be located at or in:</p> <ul style="list-style-type: none"> <li>a. employment areas that are existing or allocated in a Local Plan for general industry (B2) and storage and distribution (B8); or</li> <li>b. existing permitted waste management sites or co-located with other waste management development; or</li> <li>c. the same site or co-located in close proximity to where the waste arises; or</li> <li>d. the curtilages of Waste Water Treatment Works (in the case of biological waste); or</li> <li>e. areas of Previously Developed Land; or</li> <li>f. redundant agricultural or forestry buildings and their curtilages (in the case of green waste and/or biological waste).</li> </ul> <p>A Local Development Order (LDO) for London Gateway Logistics Park has been made and covers all currently available land.</p>		
Area 13	Sustainable Employment Growth (CSSP2) and Strategic Employment Provision (CSTP6)	Thurrock Council Core Strategy and Policies for Management of Development (2015)	Scoped out

No.	Land allocation or current planning/ DCO application	Local plan	Scope in/ out
	<p>At London Gateway the following developments are promoted:</p> <ul style="list-style-type: none"> <li>• Core sectors: port, logistics and transport;</li> <li>• Growth Sectors: environmental technologies; recycling; and energy</li> <li>• Flagship developments: Training, Innovation and Research Facility; Business and Distribution Park.</li> </ul> <p>This area is not allocated as a strategic site allocation or an area of search within the Essex and Southend on Sea Waste Local Plan 2017. There is a strong preference for waste development to be delivered on site allocations and Areas of Search before alternative (unallocated) locations are considered. Policy 5 of the Essex and Southend on Sea Waste Local Plan 2017 should be considered as above.</p> <p>Outline planning permission has been submitted to Thurrock Borough Council for Thames Enterprise Park which covers this site.</p>	Essex and Southend on Sea Waste Local Plan 2017	This site is scoped out due to the outline planning permission for Thames Enterprise Park which covers the site.
Area 14	<p>Sustainable Employment Growth (CSSP2) and Strategic Employment Provision (CSTP6)</p> <p>At London Gateway the following developments are promoted:</p>	<p>Thurrock Council Core Strategy and Policies for Management of Development (2015)</p> <p>Essex and Southend on Sea Waste Local Plan 2017</p>	<p>Scoped in</p> <p>Although this site is not allocated as a strategic site allocation or an area of search within the Essex and</p>

No.	Land allocation or current planning/ DCO application	Local plan	Scope in/ out
	<ul style="list-style-type: none"> <li>Core sectors: port, logistics and transport;</li> <li>Growth Sectors: environmental technologies; recycling; and energy</li> <li>Flagship developments: Training, Innovation and Research Facility; Business and Distribution Park.</li> </ul> <p>This area is not allocated as a strategic site allocation or an area of search within the Essex and Southend on Sea Waste Local Plan 2017. There is a strong preference for waste development to be delivered on site allocations and Areas of Search before alternative (unallocated) locations are considered. Policy 5 of the Essex and Southend on Sea Waste Local Plan 2017 should be considered as above.</p> <p>Outline planning permission has been provided by Thurrock Borough Council for a 11MW peaking power generation plant which partially covers this site however there is sufficient area on this site to facilitate a development of 25ha.</p>		<p>Southend on Sea Waste Local Plan 2017, it is allocated for employment growth and provision with growth sectors including energy and therefore the site would be potentially suitable for the Facility under Policy 5 of the Essex and Southend on Sea Waste Local Plan 2017.</p>
Area 15	<p>Green Belt (Castle Point Borough Council Adopted Local Plan (1998)).</p> <p>This area is not allocated as a strategic site allocation or an area of search within the Essex and Southend on Sea Waste Local Plan</p>	<p>Castle Point Borough Council Adopted Local Plan (1998)</p> <p>Essex and Southend on Sea Waste Local Plan 2017</p>	<p>Scoped out</p> <p>This site is not allocated for employment or industrial use and therefore with respect to the development plan is not consistent</p>

No.	Land allocation or current planning/ DCO application	Local plan	Scope in/ out
	2017. There is a strong preference for waste development to be delivered on site allocations and Areas of Search before alternative (unallocated) locations are considered.		with policy for use as a suitable site for a location of waste management under the minerals and waste local plan. In addition, development proposals within the Green Belt need to demonstrate very special circumstances which presents a significant risk in planning terms.
Area 16	<p>Minerals and waste safeguarded areas, area of high landscape value, coastal change management area (The Swale Borough Local Plan (2017)).</p> <p>The Kent Minerals and Waste Local Plan 2013 – 2030 Policy CSW 6 Location of Built Waste Management Facilities notes the following locations will be granted consent providing there is no adverse impact on the environment and communities and where such uses are compatible with the development plan:</p> <ol style="list-style-type: none"> <li>1. within or adjacent to an existing mineral development or waste management use</li> <li>2. forming part of a new major development for B8 employment or mixed uses</li> <li>3. within existing industrial estates</li> <li>4. other previously developed, contaminated or derelict land not allocated for another use</li> </ol>	<p>The Swale Borough Local Plan (2017)</p> <p>Kent Minerals and Waste Local Plan 2013 - 2030</p>	<p>Scoped out</p> <p>This site is not allocated for employment or industrial use and therefore with respect to the development plan is not consistent with policy for use as a suitable site for a location of waste management under the minerals and waste local plan.</p>

No.	Land allocation or current planning/ DCO application	Local plan	Scope in/ out
	<p>5. redundant agricultural and forestry buildings and their curtilages.</p> <p>Proposals on greenfield land will only be permitted if it can be demonstrated that there are no suitable locations identifiable from categories 1 to 5 above within the intended catchment area of waste arisings.</p>		
Area 17	<p>Minerals and waste safeguarded areas, area of high landscape value, coastal change management area (The Swale Borough Local Plan (2017)).</p> <p>The Kent Minerals and Waste Local Plan 2013 – 2030 Policy CSW 6 Location of Built Waste Management Facilities notes the following locations will be granted consent providing there is no adverse impact on the environment and communities and where such uses are compatible with the development plan:</p> <ol style="list-style-type: none"> <li>1. within or adjacent to an existing mineral development or waste management use</li> <li>2. forming part of a new major development for B8 employment or mixed uses</li> <li>3. within existing industrial estates</li> <li>4. other previously developed, contaminated or derelict land not allocated for another use</li> </ol>	<p>The Swale Borough Local Plan (2017)</p> <p>Kent Minerals and Waste Local Plan 2013 - 2030</p>	<p>Scoped out</p> <p>This site is not allocated for employment or industrial use and therefore with respect to the development plan is not consistent with policy for use as a suitable site for a location of waste management under the minerals and waste local plan.</p>



No.	Land allocation or current planning/ DCO application	Local plan	Scope in/ out
	<p>5. redundant agricultural and forestry buildings and their curtilages.</p> <p>Proposals on greenfield land will only be permitted if it can be demonstrated that there are no suitable locations identifiable from categories 1 to 5 above within the intended catchment area of waste arisings.</p>		
Area 18	<p>Minerals and waste safeguarded areas, area of high landscape value, coastal change management area (The Swale Borough Local Plan (2017)).</p> <p>The Kent Minerals and Waste Local Plan 2013 – 2030 Policy CSW 6 Location of Built Waste Management Facilities notes the following locations will be granted consent providing there is no adverse impact on the environment and communities and where such uses are compatible with the development plan:</p> <ol style="list-style-type: none"> <li>1. within or adjacent to an existing mineral development or waste management use</li> <li>2. forming part of a new major development for B8 employment or mixed uses</li> <li>3. within existing industrial estates</li> <li>4. other previously developed, contaminated or derelict land not allocated for another use</li> <li>5. redundant agricultural and forestry buildings and their curtilages.</li> </ol>	<p>The Swale Borough Local Plan (2017)</p> <p>Kent Minerals and Waste Local Plan 2013 - 2030</p>	<p>Scoped out</p> <p>This site is not allocated for employment or industrial use and therefore with respect to the development plan is not consistent with policy for use as a suitable site for a location of waste management under the minerals and waste local plan.</p>

No.	Land allocation or current planning/ DCO application	Local plan	Scope in/ out
	<p>Proposals on greenfield land will only be permitted if it can be demonstrated that there are no suitable locations identifiable from categories 1 to 5 above within the intended catchment area of waste arisings.</p>		
Area 19	<p>Minerals and waste safeguarded areas, area of high landscape value, coastal change management area (The Swale Borough Local Plan (2017)).</p> <p>The Kent Minerals and Waste Local Plan 2013 – 2030 Policy CSW 6 Location of Built Waste Management Facilities notes the following locations will be granted consent providing there is no adverse impact on the environment and communities and where such uses are compatible with the development plan:</p> <ol style="list-style-type: none"> <li>1. within or adjacent to an existing mineral development or waste management use</li> <li>2. forming part of a new major development for B8 employment or mixed uses</li> <li>3. within existing industrial estates</li> <li>4. other previously developed, contaminated or derelict land not allocated for another use</li> <li>5. redundant agricultural and forestry buildings and their curtilages.</li> </ol>	<p>The Swale Borough Local Plan (2017)</p> <p>Kent Minerals and Waste Local Plan 2013 - 2030</p>	<p>Scoped out</p> <p>This site is not allocated for employment or industrial use and therefore with respect to the development plan is not consistent with policy for use as a suitable site for a location of waste management under the minerals and waste local plan.</p>

No.	Land allocation or current planning/ DCO application	Local plan	Scope in/ out
	<p>Proposals on greenfield land will only be permitted if it can be demonstrated that there are no suitable locations identifiable from categories 1 to 5 above within the intended catchment area of waste arisings.</p>		
<p>Area 20</p>	<p>Coastal Flood Area (Medway Local Plan 2003)</p> <p>The Kent Minerals and Waste Local Plan 2013 – 2030 Policy CSW 6 Location of Built Waste Management Facilities notes the following locations will be granted consent providing there is no adverse impact on the environment and communities and where such uses are compatible with the development plan:</p> <ol style="list-style-type: none"> <li>1. within or adjacent to an existing mineral development or waste management use</li> <li>2. forming part of a new major development for B8 employment or mixed uses</li> <li>3. within existing industrial estates</li> <li>4. other previously developed, contaminated or derelict land not allocated for another use</li> <li>5. redundant agricultural and forestry buildings and their curtilages.</li> </ol> <p>Proposals on greenfield land will only be permitted if it can be demonstrated that there are no suitable locations identifiable from categories 1 to 5 above within the intended catchment area of waste arisings.</p>	<p>Medway Local Plan 2003</p> <p>Kent Minerals and Waste Local Plan 2013 - 2030</p>	<p>Scoped out</p> <p>This site is not allocated for employment or industrial use and therefore with respect to the development plan is not consistent with policy for use as a suitable site for a location of waste management under the minerals and waste local plan.</p>

No.	Land allocation or current planning/ DCO application	Local plan	Scope in/ out
Area 21	<p>Coastal Flood Area (Medway Local Plan 2003)</p> <p>The Kent Minerals and Waste Local Plan 2013 – 2030 Policy CSW 6 Location of Built Waste Management Facilities notes the following locations will be granted consent providing there is no adverse impact on the environment and communities and where such uses are compatible with the development plan:</p> <ol style="list-style-type: none"> <li>1. within or adjacent to an existing mineral development or waste management use</li> <li>2. forming part of a new major development for B8 employment or mixed uses</li> <li>3. within existing industrial estates</li> <li>4. other previously developed, contaminated or derelict land not allocated for another use</li> <li>5. redundant agricultural and forestry buildings and their curtilages.</li> </ol> <p>Proposals on greenfield land will only be permitted if it can be demonstrated that there are no suitable locations identifiable from categories 1 to 5 above within the intended catchment area of waste arisings.</p>	<p>Medway Local Plan 2003</p> <p>Kent Minerals and Waste Local Plan 2013 - 2030</p>	<p>Scoped out</p> <p>This site is not allocated for employment or industrial use and therefore with respect to the development plan is not consistent with policy for use as a suitable site for a location of waste management under the minerals and waste local plan.</p>
Area 22	Partially Proposed Employment Area (S12, ED5, ED7 and ED8), partially Existing	Medway Local Plan 2003 (adopted)	Scoped in

No.	Land allocation or current planning/ DCO application	Local plan	Scope in/ out
	<p>Employment Area (S12, ED1, ED7, ED8). Eastern section – Special Landscape Area. (Medway Local Plan 2003 (adopted))</p> <p>To be designated as “expansion &amp;/or intensification of existing employment areas”. (Medway Local Plan (2019 to 2037))</p> <p>Medway Strategic Land Availability Assessment (2018) has allocated this area as “Employment (B2/ B8)”.</p> <p>The Kent Minerals and Waste Local Plan 2013 – 2030 Policy CSW 6 Location of Built Waste Management Facilities notes the following locations will be granted consent providing there is no adverse impact on the environment and communities and where such uses are compatible with the development plan:</p> <ol style="list-style-type: none"> <li>1. within or adjacent to an existing mineral development or waste management use</li> <li>2. forming part of a new major development for B8 employment or mixed uses</li> <li>3. within existing industrial estates</li> <li>4. other previously developed, contaminated or derelict land not allocated for another use</li> <li>5. redundant agricultural and forestry buildings and their curtilages.</li> </ol>	<p>Medway Local Plan (2019 to 2037) (to be adopted in 2022)</p> <p>Kent Minerals and Waste Local Plan 2013 - 2030</p>	<p>This site is within an area of existing industrial use and is allocated as B8 employment therefore would be potentially suitable as a location for the Facility under Policy CSW 6 of the Kent Minerals and Waste Local Plan 2013 – 2030.</p> <p>However, Policy CSW 6 also notes planning permission will be granted for proposals that do not give rise to significant adverse impacts upon national and international designated sites. Therefore, although scoped in at this stage the potential for impacting designated sites is covered in <b>Table 3-4</b>.</p>

No.	Land allocation or current planning/ DCO application	Local plan	Scope in/ out
Area 23	<p>Existing Employment Area S13, ED1, ED7 and ED8 (Medway Local Plan 2003 (adopted))</p> <p>To be designated as “expansion &amp;/or intensification of existing employment areas”. (Medway Local Plan (2019 to 2037))</p> <p>Medway Strategic Land Availability Assessment (2018) has allocated this area as “Employment (B2/ B8/ SG energy related industries)”.</p> <p>The Kent Minerals and Waste Local Plan 2013 – 2030 Policy CSW 6 Location of Built Waste Management Facilities notes the following locations will be granted consent providing there is no adverse impact on the environment and communities and where such uses are compatible with the development plan:</p> <ol style="list-style-type: none"> <li>1. within or adjacent to an existing mineral development or waste management use</li> <li>2. forming part of a new major development for B8 employment or mixed uses</li> <li>3. within existing industrial estates</li> <li>4. other previously developed, contaminated or derelict land not allocated for another use</li> <li>5. redundant agricultural and forestry buildings and their curtilages.</li> </ol>	<p>Medway Local Plan 2003 (adopted)</p> <p>Medway Local Plan (2019 to 2037) (to be adopted in 2022)</p> <p>Kent Minerals and Waste Local Plan 2013 - 2030</p>	<p>Scoped in</p> <p>This site is within an area of existing industrial use and is allocated as B8 employment therefore would be suitable as a location under Policy CSW 6 of the Kent Minerals and Waste Local Plan 2013 – 2030.</p> <p>However, Policy CSW 6 also notes planning permission will be granted for proposals that do not give rise to significant adverse impacts upon national and international designated sites. Therefore, although scoped in at this stage the potential for impacting designated sites is covered in <b>Table 3-4</b>.</p>

No.	Land allocation or current planning/ DCO application	Local plan	Scope in/ out
Area 24	<p>Proposed Employment Area S13, ED5, ED7, ED8 (Medway Local Plan 2003)</p> <p>To be designated as “expansion &amp;/or intensification of existing employment areas”. (Medway Local Plan (2019 to 2037)). Medway Strategic Land Availability Assessment (2018) has allocated this area as “Employment (B2/ B8/ SG energy related industries)”.</p> <p>The Kent Minerals and Waste Local Plan 2013 – 2030 Policy CSW 6 Location of Built Waste Management Facilities notes the following locations will be granted consent providing there is no adverse impact on the environment and communities and where such uses are compatible with the development plan:</p> <ol style="list-style-type: none"> <li>1. within or adjacent to an existing mineral development or waste management use</li> <li>2. forming part of a new major development for B8 employment or mixed uses</li> <li>3. within existing industrial estates</li> <li>4. other previously developed, contaminated or derelict land not allocated for another use</li> <li>5. redundant agricultural and forestry buildings and their curtilages.</li> </ol>	<p>Medway Local Plan 2003</p> <p>Medway Local Plan (2019 to 2037) (to be adopted in 2022)</p> <p>Kent Minerals and Waste Local Plan 2013 - 2030</p>	<p>Scoped in</p> <p>This site is within an area of existing industrial use and is allocated as B8 employment therefore would be suitable as a location under Policy CSW 6 of the Kent Minerals and Waste Local Plan 2013 – 2030.</p> <p>However, Policy CSW 6 also notes planning permission will be granted for proposals that do not give rise to significant adverse impacts upon national and international designated sites. Therefore, although scoped in at this stage the potential for impacting designated sites is covered in <b>Table 3-4</b>.</p>
Area 25	Special Landscape Area (Medway Local Plan 2003)	Medway Local Plan 2003	Scoped out

No.	Land allocation or current planning/ DCO application	Local plan	Scope in/ out
	<p>The Kent Minerals and Waste Local Plan 2013 – 2030 Policy CSW 6 Location of Built Waste Management Facilities notes the following locations will be granted consent providing there is no adverse impact on the environment and communities and where such uses are compatible with the development plan:</p> <ol style="list-style-type: none"> <li>1. within or adjacent to an existing mineral development or waste management use</li> <li>2. forming part of a new major development for B8 employment or mixed uses</li> <li>3. within existing industrial estates</li> <li>4. other previously developed, contaminated or derelict land not allocated for another use</li> <li>5. redundant agricultural and forestry buildings and their curtilages.</li> </ol> <p>Proposals on greenfield land will only be permitted if it can be demonstrated that there are no suitable locations identifiable from categories 1 to 5 above within the intended catchment area of waste arisings.</p>	<p>Kent Minerals and Waste Local Plan 2013 - 2030</p>	<p>This site is not allocated for employment or industrial use and therefore with respect to the development plan is not consistent with policy for use as a suitable site for a location of waste management under the minerals and waste local plan.</p>
<p>Area 26</p>	<p>Green Belt (CS02) and Local Wildlife Site (CS12) (Gravesham Local Plan (Adopted 2014))</p>	<p>Gravesham Local Plan (Adopted 2014)</p> <p>Kent Minerals and Waste Local Plan 2013 - 2030</p>	<p>Scoped out</p> <p>This site is not allocated for employment or industrial use and therefore with respect to the</p>



No.	Land allocation or current planning/ DCO application	Local plan	Scope in/ out
	<p>The Kent Minerals and Waste Local Plan 2013 – 2030 Policy CSW 6 Location of Built Waste Management Facilities notes the following locations will be granted consent providing there is no adverse impact on the environment and communities and where such uses are compatible with the development plan:</p> <ol style="list-style-type: none"> <li>1. within or adjacent to an existing mineral development or waste management use</li> <li>2. forming part of a new major development for B8 employment or mixed uses</li> <li>3. within existing industrial estates</li> <li>4. other previously developed, contaminated or derelict land not allocated for another use</li> <li>5. redundant agricultural and forestry buildings and their curtilages.</li> </ol> <p>Proposals on greenfield land will only be permitted if it can be demonstrated that there are no suitable locations identifiable from categories 1 to 5 above within the intended catchment area of waste arisings.</p>		<p>development plan is not consistent with policy for use as a suitable site for a location of waste management under the minerals and waste local plan. In addition, development proposals within the Green Belt need to demonstrate very special circumstances which presents a significant risk in planning terms.</p>
Area 27	<p>Sustainable Green Belt (CSSP4) (Thurrock Council Core Strategy and Policies for Management of Development (2015))</p> <p>Development in the Green Belt (PMD6) "The Council will maintain, protect and enhance the</p>	<p>Thurrock Council Core Strategy and Policies for Management of Development (2015)</p> <p>Essex and Southend on Sea Waste Local Plan 2017</p>	<p>Scoped out</p> <p>This site is not suitable as it is designated as Green Belt which does not meet the requirements of Policy 5 of the Essex and Southend on Sea</p>

No.	Land allocation or current planning/ DCO application	Local plan	Scope in/ out
	<p>open character of the Green Belt in Thurrock in accordance with the provisions of the NPPF.”</p> <p>This area is not allocated as a strategic site allocation or an area of search within the Essex and Southend on Sea Waste Local Plan 2017. There is a strong preference for waste development to be delivered on site allocations and Areas of Search before alternative (unallocated) locations are considered. Policy 5 of the Essex and Southend on Sea Waste Local Plan 2017 should be considered as above.</p>		<p>Waste Local Plan 2017 for “Enclosed Waste Facilities on unallocated sites or outside Areas of Search”. In addition, development proposals within the Green Belt need to demonstrate very special circumstances which presents a significant risk in planning terms.</p>
Area 28	<p>Sustainable Green Belt (CSSP4) (Thurrock Council Core Strategy and Policies for Management of Development (2015))</p> <p>Development in the Green Belt (PMD6) “The Council will maintain, protect and enhance the open character of the Green Belt in Thurrock in accordance with the provisions of the NPPF.”</p> <p>This area is not allocated as a strategic site allocation or an area of search within the Essex and Southend on Sea Waste Local Plan 2017. There is a strong preference for waste development to be delivered on site allocations and Areas of Search before alternative</p>	<p>Thurrock Council Core Strategy and Policies for Management of Development (2015)</p> <p>Essex and Southend on Sea Waste Local Plan 2017</p>	<p>Scoped out</p> <p>This site is not suitable as it is designated as Green Belt which does not meet the requirements of Policy 5 of the Essex and Southend on Sea Waste Local Plan 2017 for “Enclosed Waste Facilities on unallocated sites or outside Areas of Search”. In addition, development proposals within the Green Belt need to demonstrate very special circumstances which presents a significant risk in planning terms.</p>

No.	Land allocation or current planning/ DCO application	Local plan	Scope in/ out
	(unallocated) locations are considered. Policy 5 of the Essex and Southend on Sea Waste Local Plan 2017 should be considered as above.		
Area 29	<p>Sustainable Green Belt (CSSP4) (Thurrock Council Core Strategy and Policies for Management of Development (2015))</p> <p>Development in the Green Belt (PMD6) “The Council will maintain, protect and enhance the open character of the Green Belt in Thurrock in accordance with the provisions of the NPPF.”</p> <p>This area is not allocated as a strategic site allocation or an area of search within the Essex and Southend on Sea Waste Local Plan 2017. There is a strong preference for waste development to be delivered on site allocations and Areas of Search before alternative (unallocated) locations are considered. Policy 5 of the Essex and Southend on Sea Waste Local Plan 2017 should be considered as above.</p>	<p>Thurrock Council Core Strategy and Policies for Management of Development (2015)</p> <p>Essex and Southend on Sea Waste Local Plan 2017</p>	<p>Scoped out</p> <p>This site is not suitable as it is designated as Green Belt which does not meet the requirements of Policy 5 of the Essex and Southend on Sea Waste Local Plan 2017 for “Enclosed Waste Facilities on unallocated sites or outside Areas of Search”. In addition, development proposals within the Green Belt need to demonstrate very special circumstances which presents a significant risk in planning terms.</p>
Area 30	<p>Policy: DP22. - Green Belt</p> <p>Policy: DP25 - Biodiversity Opportunity Areas. Site - Thames-side Green Corridors</p>	<p>Dartford Development Policies Local Plan (Adopted 2017)</p>	<p>Scoped out</p> <p>This area is not allocated for employment or industrial use and</p>

No.	Land allocation or current planning/ DCO application	Local plan	Scope in/ out
	<p>Policy: DP24 - Borough Open Space</p> <p>Policy: DP25 - Local Wildlife Sites. Site - DA04 - Dartford Marshes</p> <p>(Dartford Development Policies Local Plan (Adopted 2017))</p> <p>The Kent Minerals and Waste Local Plan 2013 – 2030 Policy CSW 6 Location of Built Waste Management Facilities notes the following locations will be granted consent providing there is no adverse impact on the environment and communities and where such uses are compatible with the development plan:</p> <ol style="list-style-type: none"> <li>1. within or adjacent to an existing mineral development or waste management use</li> <li>2. forming part of a new major development for B8 employment or mixed uses</li> <li>3. within existing industrial estates</li> <li>4. other previously developed, contaminated or derelict land not allocated for another use</li> <li>5. redundant agricultural and forestry buildings and their curtilages.</li> </ol> <p>Proposals on greenfield land will only be permitted if it can be demonstrated that there are no suitable locations identifiable from</p>	<p>Kent Minerals and Waste Local Plan 2013 - 2030</p>	<p>therefore with respect to the development plan is not consistent with policy for use as a suitable site for a location of waste management under the minerals and waste local plan. In addition, development proposals within the Green Belt need to demonstrate very special circumstances which presents a significant risk in planning terms.</p>

No.	Land allocation or current planning/ DCO application	Local plan	Scope in/ out
	categories 1 to 5 above within the intended catchment area of waste arisings.		
Area 31	<p>Site of Importance for Nature Conservation (SINC) (New Forest District Council Local Plan 2016-2036).</p> <p>The Hampshire Minerals and Waste Local Plan (2013) Policy 29 Locations and sites for waste management notes:</p> <p>1. Development to provide recycling, recovery and/ or treatment of waste will be supported on suitable sites in the following locations:</p> <ul style="list-style-type: none"> <li>i. Urban areas in north-east and south Hampshire;</li> <li>ii. Areas along the strategic road corridors; and</li> <li>iii. Areas of major new or planned development.</li> </ul>	<p>New Forest District Council Local Plan 2016-2036</p> <p>Hampshire Minerals and Waste Local Plan 2013</p>	<p>Scoped out</p> <p>This area is allocated as a SINC and not for employment or industrial use and therefore with respect to the development plan is not consistent with policy for use as a suitable site for a location of waste management under the minerals and waste local plan.</p>

### 3.4 Step 4: Short list option assessment

3.4.1 Following Step 3, there are four short-listed site options which include land with a relevant employment, waste management or energy development planning allocation. **Table 3-4** below presents each of the short-listed option sites and details of any national site network (or Ramsar site) in the near vicinity. National designations and the presence of priority habitats have also been considered where these sites are in close proximity to national site network sites as impacts on these habitats may lead to indirect effects on the national site network. **Figure 3-7** shows the short-listed options along with the designations referred to above.

**Table 3-4 Assessment of likelihood of national site network sites (and other designated sites) with the potential to be negatively impacted by shortlisted options**

Short list option	International designations (national site network and Ramsar site) and other key ecological constraints (national designations and priority habitats)	Description of potential risks	National site network (and / or Ramsar sites) likely to be negatively impacted?
Area 22	Immediately adjacent to Medway Estuary and Marshes SPA /Ramsar Site and Medway Estuary Marine Conservation Zone (MCZ)	Building a wharf/jetty directly within the designated areas affecting both Ramsar designation, SPA qualifying species and the MCZ.  Vessel movements impacting qualifying species of the SPA.	Potential direct effects on the designated sites due to wharf/jetty construction. Potential indirect effects on the designated sites due to construction and operation of the Facility.
Area 23	Immediately adjacent to Medway Estuary and Marshes Special Protection Area (SPA) /Ramsar Site and Medway Estuary MCZ.	Disturbance associated with construction and operation directly adjacent to designated areas.	Potential indirect effects on the designated sites due to construction and operation of the Facility.
Area 24	Immediately adjacent to Medway Estuary and Marshes SPA /Ramsar Site and Medway Estuary MCZ.	Building a wharf/jetty directly within the designated areas affecting the Ramsar Site designation, SPA qualifying species and the MCZ.	Potential direct effects on the designated sites due to wharf/jetty construction. Potential indirect effects on the designated sites due to construction and operation of the Facility.

Short list option	International designations (national site network and Ramsar site) and other key ecological constraints (national designations and priority habitats)	Description of potential risks	National site network (and / or Ramsar sites) likely to be negatively impacted?
		Vessel movements impacting qualifying species of the SPA.	
Area 14	<p>Thames Estuary and Marshes SPA and Ramsar Site is approximately 2.6km south of the site.</p> <p>The site is directly adjacent to Holehaven Creek Site of Special Scientific Interest (SSSI).</p> <p>Site is adjacent to coastal saltmarsh and mudflat Priority Habitat.</p>	<p>Indirect impacts on Thames Estuary and Marshes SPA species through increased vessel movements.</p> <p>Wharf/jetty construction would directly impact the SSSI and likely result in significant loss of saltmarsh and mudflat priority habitat which support a nationally important number of black tailed godwit <i>Limosa limosa islandica</i>. This species also regularly occurs in numbers of international importance (Natural England, 2003).</p> <p>Black tailed godwit are a qualifying species of the Thames Estuary and Marshes SPA (Natural England, 2014).</p>	Potential indirect effects on the designated sites due to construction and operation of the Facility.

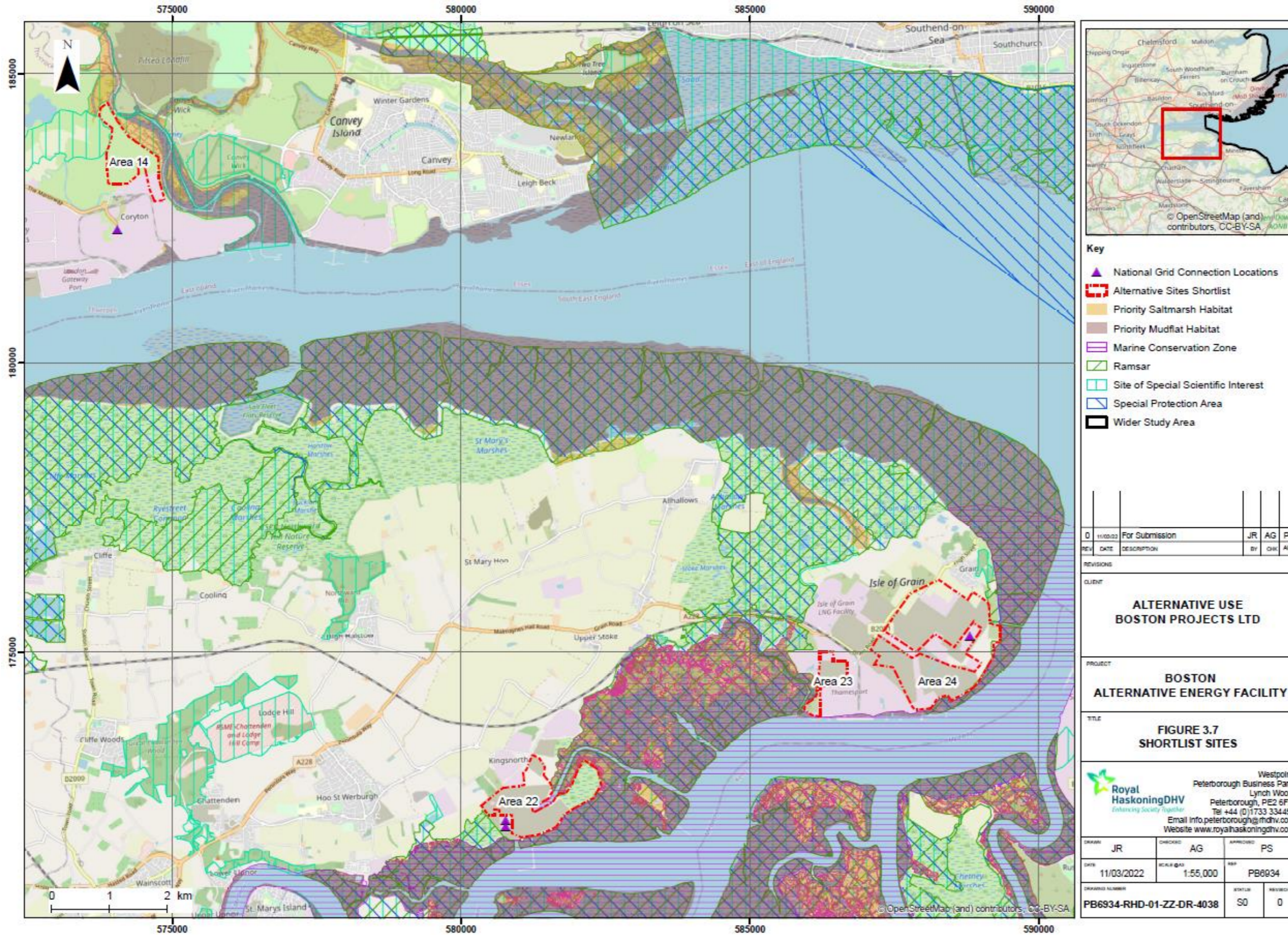


Figure 3-7 Shortlist of sites



## Step 4 Conclusions

- 3.4.2 For all four short-listed sites outlined above, vessels would be required to transit through the Outer Thames Estuary SPA which could potentially result in effects on the qualifying species of the SPA. In particular, red-throated divers are one of the qualifying species of the SPA which are highly sensitive to noise and visual disturbance in their wintering areas. Thus, vessel traffic has the potential to result in disturbance and (potentially) displacement of non-breeding red-throated divers.
- 3.4.3 In addition to potential effects on the Outer Thames Estuary SPA, Areas 22, 23 and 24 are all immediately adjacent to national site network and Ramsar sites and therefore would likely have a greater impact on the national site network than the development of the Facility due to direct and indirect effects on such sites (as described in **Table 3-4**). This is in comparison to the Facility which is located approximately 3km from the Wash SPA / Ramsar and the Wash and North Norfolk Coast SAC.
- 3.4.4 Area 14 is adjacent to a navigable waterway; however, it is designated as Holehaven Creek SSSI and the area adjacent to the site option contains a significant area of priority saltmarsh and priority mudflats. The wharf construction at this location may result in significant direct loss of these priority habitats. Considering these habitats are in relatively close proximity (approximately 2.6km) to the Thames Estuary and Marshes SPA and Ramsar site, it is considered that this site would not result in a lesser effect on the national site network compared to development of the Facility. As noted in **Table 3-4** the Holehaven Creek SSSI supports a nationally important number of black tailed godwit which are also a qualifying feature of the Thames Estuary and Marshes SPA, therefore it is likely that any effects on the population associated with the SSSI would also indirectly effect the Thames Estuary and Marshes SPA (i.e. the habitat within the SSSI is likely to have a supporting function to the SPA and Ramsar site). The SSSI also supports birds which are either a qualifying species of the SPA or form part of the qualifying waterbird assemblage.

## 4 Conclusions

- 4.1.1 Overall, it is concluded that there are no potentially feasible alternative sites to that being considered for the Facility which would have a less damaging effect on the national site network (and Ramsar sites). Therefore, it is considered that the option of an alternative location would not constitute an alternative solution to the proposed Facility.

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