



Longfield Solar Farm

Other Documents [Ref: EN010118]

Waste Infrastructure Impact Assessment

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Executive Summary

This Waste Infrastructure Impact Assessment (WIIA) has been prepared in respect of an application for a Development Consent Order (DCO) for the construction, operation (including maintenance) and decommissioning of Longfield Solar Farm (the Scheme). The Scheme consists of solar photovoltaic (PV) array electricity generating facility, Battery Energy Storage System (BESS) and export connection to the national electricity transmission network (NETS), including extension of the existing Bulls Lodge Substation (the Scheme).

The Scheme is defined under the Planning Act 2008 as a Nationally Significant Infrastructure Project (NSIP) as it comprises a generating station in England with a capacity exceeding 50 megawatts (MW). It therefore requires a DCO from the Secretary of State for Business, Energy and Industrial Strategy (the SoS). This document has been prepared on behalf of Longfield Solar Energy Farm Ltd (the Applicant) to support the DCO application and should be read in conjunction with the other documents submitted with the Application. Longfield Solar Energy Farm Ltd is a joint venture between EDF-Renewables and Padero Solar.

The WIIA has been prepared as part of the Order limits is located within Waste Consultation Areas (WCA) associated with Boreham Recycling Centre or Bulls Lodge Inert Recycling.

The WIIA considers the impact of the Scheme on the existing waste sites, and the impact of the existing waste sites on the Scheme. It concludes that the Scheme would not experience significant adverse impacts as a result of the ongoing operations at Boreham Recycling Centre and Bulls Lodge Inert Recycling, and that Boreham Recycling Centre and Bulls Lodge Inert Recycling would not experience any significant adverse impacts as a result of the Scheme.

1. Introduction and Background

1.1 Introduction

- 1.1.1 Longfield Solar Energy Farm Limited (the 'Applicant') is applying for a Development Consent Order (DCO) under the Planning Act 2008 for the Longfield Solar Farm (hereafter referred to as the 'Scheme'). The Scheme comprises the installation of solar photovoltaic (PV) generating panels and on-site energy storage facilities on land in Essex (hereafter referred to as the 'Order limits') together with grid connection infrastructure, and would allow for the generation, storage and export of electricity to the national electricity transmission system (NETS).
- 1.1.2 The Application is required because the Scheme is classified as a Nationally Significant Infrastructure Project (NSIP). The Application is to be made to the Secretary of State (SoS) for the Department for Business, Energy & Industrial Strategy (BEIS), under Section 37 of the Planning Act 2008.
- 1.1.3 The Scheme is located on approximately 454 hectares (ha) of land, approximately 6 kilometres (km) north east of Chelmsford. The Proposed Development is located in a predominantly rural area consisting mainly of mixed agricultural land and associated farms and scattered woodland. The Proposed Development consists of the following as shown on the Works Plans [EN010118/APP/2.2]:
- a. A ground mounted solar photovoltaic generating station (Work No. 1);
 - b. Battery energy storage system (BESS) compounds (Work Nos. 2A and 2B);
 - c. An onsite substation compound (the Longfield Substation) (Work No. 3);
 - d. Works to lay high voltage electrical cables (Work No.4), including works to lay one 400 kV cable circuit and associated infrastructure (Work No. 4A) and temporary construction laydown areas (Work No. 4B);
 - e. An extension to the existing Bulls Lodge substation, comprising an electricity switching station, including access (Work No. 5A), and temporary overhead line alterations (Work No. 5B);
 - f. Other works required for the Scheme (e.g. cables, boundary treatment, CCTV, lighting, landscaping, biodiversity enhancement, tracks, earthworks, surface water management, temporary construction compounds, temporary footpath diversions, diversion of cables) (Work No. 6 and listed at the end of Schedule 1 of the draft DCO);
 - g. Temporary construction and decommissioning laydown areas for the Solar Farm Site (Work No. 7A) and the Bulls Lodge Substation Extension (Work No. 7B);
 - h. Office, warehouse and plant storage building (Work No. 8);
 - i. Works to facilitate access, including road widening of highways to facilitate access to the Order limits (Work No. 9); and

j. Areas for habitat management (Work No. 10).

- 1.1.4 The Scheme is expected to operate for approximately 40 years. After the Scheme ceases to operate, the Solar Farm Site will undergo decommissioning. All PV modules, mounting poles, cabling, inverters and transformers associated with Works Nos. 1, 2 and 3 will be removed. The extension to Bulls Lodge Substation Extension and Grid Connection cable would remain in-situ, although the Grid Connection cable would be redundant.
- 1.1.5 The Scheme is located within the administrative boundary of Essex County Council (ECC), Chelmsford City Council (CCC) and Braintree District Council (BDC).

1.2 Minerals and Waste Planning Authority's Comments

- 1.2.1 ECC is the Waste Planning Authority (WPA) and as such, in addition to being responsible for granting planning permission for waste development, is responsible for planning control of waste development including waste needs, waste consultation areas, site allocations and determination of waste planning applications.
- 1.2.2 ECC submitted a formal consultation response to the submitted Environmental Impact Assessment (EIA) Scoping Report for the Scheme on 4th December 2020, which highlights that part of the Scheme Site falls within a Waste Consultation Area associated with Boreham Recycling Centre.
- 1.2.3 A meeting was held between representatives of the Applicant, AECOM and ECC planners on 18th March 2021. ECC planners advised that a Waste Infrastructure Impact Assessment (WIIA) is required to accompany the DCO application, to assess the impact of the Scheme on waste infrastructure (specifically Boreham Recycling Centre and Bulls Lodge Inert Recycling).
- 1.2.4 ECC also advised that a Minerals Safeguarding Assessment (MSA) and Minerals Infrastructure Impact Assessment (MIIA) are required, to assess the impact of the Scheme on minerals resources/ safeguarding and minerals infrastructure (specifically Bulls Lodge Quarry) respectively. These documents are submitted separately.

1.3 Report Structure

- 1.3.1 The remainder of this report is structured as follows:
- a. Waste management policy;
 - b. Considerations;
 - c. Potential sensitivity and impact of the Scheme upon safeguarded waste infrastructure; and
 - d. Summary and conclusions.

2. Waste Management Policy

2.1 Introduction

- 2.1.1 When determining a DCO application, the Secretary of State is required to have regard to any relevant National Policy Statements (NPS), as well as: any Local Impact Report, any prescribed matters, and any other matters that the Secretary of State thinks are both important and relevant to their decision. Other national and local planning policies and guidance, including adopted and emerging Development Plan policies, have the potential to be considered by the Secretary of State to be other matters which are important and relevant to the decision.
- 2.1.2 The following sections refer to local planning policies in relation to waste that could be important and relevant to the Secretary of State's decision:

2.2 National Policy Statements

National Policy Statement for Energy (EN-1)

- 2.2.1 The overarching NPS for Energy (EN-1) (NPS EN-1) came into force in July 2011. It sets out general principles and impacts to be taken into account for all types of energy NSIP development covered by the Energy NPSs. It forms the primary basis for determining if development consent should be granted and is underpinned by the principle that the development of large scale renewable energy generation projects are needed (amongst other types of generation capacity) in order to meet the demand for energy generation in the United Kingdom (UK), and to reduce greenhouse gas emissions from energy generation in order to meet the Government's decarbonisation targets.
- 2.2.2 Paragraph 5.10.9 of the 2011 EN-1 states that applicants should safeguard any mineral resources on the proposed site as far as possible, taking into account the long-term potential of the land use after any future decommissioning has taken place.
- 2.2.3 Paragraph 5.10.22 states that where a proposed development has an impact upon a Mineral Safeguarding Area, the Secretary of State should ensure that appropriate mitigation measures have been put in place to safeguard mineral resources.

2.3 Draft National Policy Statements

- 2.3.1 The Government is currently reviewing and updating the Energy NPSs for two primary reasons:
- to reflect its policies and strategic approach for the energy system that is set out in the Energy White Paper (December 2020), and
 - to ensure that the planning policy framework delivers the infrastructure required for the country's transition to net zero carbon emissions.
- 2.3.2 As part of the Energy NPS review process, the Government published a suite of Draft Energy NPSs for consultation on 6 September 2021. Draft National Policy Statement for Renewable Energy (EN-3) (Draft NPS EN-3) includes specific policies for solar photovoltaic generation NSIPs. The enactment of

Draft NPS EN-3 will therefore bring solar NSIP developments into the Energy NPSs.

Draft National Policy Statement for Energy (EN-1)

- 2.3.3 Draft NPS EN-1 sets out general principles and impacts to be taken into account for all types of energy NSIP development covered by the Energy NPSs. Once enacted it will form the primary basis for determining if development consent should be granted and is underpinned by the principle that the development of large scale renewable energy generation infrastructure is urgently needed in order for the Government's targets and commitments for the energy system to be met. It sets out at paragraph 3.3.21 that, along with wind, solar electricity generation will help to reduce costs and provide a clean and secure source of electricity supply, and that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar.
- 2.3.4 Paragraph 5.11.9 of the draft EN-1 repeats paragraph 5.10.9 of the 2011 EN-1. It makes clear that applicants should safeguard any mineral resources on the proposed site as far as possible, taking into account the long-term potential of the land use after any future decommissioning has taken place.
- 2.3.5 Likewise, paragraph 5.11.21 repeats paragraph 5.10.22 of the 2011 EN-1. It states that where a proposed development has an impact upon a Mineral Safeguarding Area, the Secretary of State should ensure that appropriate mitigation measures have been put in place to safeguard mineral resources.

Draft Policy Statement for Renewable Energy Infrastructure (EN-3)

- 2.3.6 Draft NPS EN-3 sets out additional policies for renewable energy infrastructure, including policies specific to the development of solar NSIPs. These include matters that applicants should consider in selecting a site, how assessments should be undertaken and how mitigation should be provided. There are no specific references to mineral safeguarding in draft EN-3.
- 2.3.7 However, paragraph 2.49.13 is of relevance as it states that the time-limited nature of solar farms is likely to be an important consideration for the Secretary of State when assessing impacts. Although not explicitly referenced, this could include the impacts arising from a delay to the extraction of any minerals below the surface of the site. The draft guidance adds that the extent to which the site will return to its original state may also be a relevant consideration.

2.4 National Planning Policy Framework (NPPF) (2021)

- 2.4.1 The revised NPPF was published in July 2021. The NPPF, together with the accompanying Planning Practice Guidance (PPG) set out the Government's planning policies for England for the particular purpose of making development plans and deciding applications under the Town and Country Planning Act 1990.
- 2.4.2 Under Section 17 (Facilitating the Sustainable Use of Minerals), NPPF paragraph 209 states:

"It is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs."

Since minerals are a finite resource, and can only be worked where they are found, best use needs to be made of them to secure their long-term conservation.”

2.4.3 NPPF paragraph 210 goes on to state:

“Planning policies should...c) safeguard mineral resources by defining Mineral Safeguarding Areas and Mineral Consultation Areas; and adopt appropriate policies so that known locations of specific minerals resources of local and national importance are not sterilised by non-mineral development where this should be avoided (whilst not creating a presumption that the resources defined will be worked); d) set out policies to encourage the prior extraction of minerals, where practical and environmentally feasible, if it is necessary for non-mineral development to take place...”

2.4.4 Paragraph 212 also states:

“Local planning authorities should not normally permit other development proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral working”

2.5 National Planning Practice Guidance (PPG)

Minerals PPG (2014)

2.5.1 The Minerals PPG (2014) confirms that minerals ‘make an essential contribution to the Country’s prosperity and quality of life’. Section 3 of the Minerals PPG states that:

“Mineral planning authorities are encouraged to plan for minerals extraction using Ordnance Survey-based proposals maps and relevant evidence provided by the minerals industry and other appropriate bodies. This approach will allow mineral planning authorities to highlight areas where mineral extraction is expected to take place, as well as managing potentially conflicting objective for use of land.”

2.5.2 Section 3 advises MPAs that they should plan for the steady and adequate supply of minerals in one or more of the following ways:

“1. Designating Specific Sites – where viable resources are known to exist, landowners are supportive of minerals development and the proposal is likely to be acceptable in planning terms. Such sites may also include essential operations associated with mineral extraction;

2. Designating Preferred Areas, where are areas of known resources where planning permission might reasonably be anticipated. Such areas may also include essential operations associated with mineral extraction; and/or;

3. Designating Areas of search – areas where knowledge of mineral resources may be less certain but within which planning permission may be granted, particularly if there is a potential shortfall in supply.”

2.6 Development Plan

Essex and Southend-on-Sea Waste Local Plan (2017)

- 2.6.1 The Essex and Southend-on-Sea Waste Local Plan was adopted by ECC on 11th July 2017 and by Southend-on-Sea Borough Council (SBC) on 19th October 2017. The plan sets out how Essex and Southend-on-Sea aim to manage waste for its duration, as well as seeking to deal with waste more sustainably, encouraging recycling and reducing reliance on landfill.
- 2.6.2 The Waste Local Plan includes:
- a. The Waste Core Strategy, which sets out the long-term direction for waste development and a plan to deliver this;
 - b. Development management policies for waste planning;
 - c. Strategic site allocations and safeguarding of waste infrastructure; and
 - d. A Policies Map, showing new site allocations.

Waste Consultation Areas

- 2.6.3 Policy 2 (Safeguarding Waste Management Sites and Infrastructure) of the Essex and Southend-on-Sea Waste Local Plan (2017) relates to Waste Consultation Areas (WCAs) and the safeguarding of existing and allocated waste sites and infrastructure. It seeks to protect waste management sites from inappropriate neighbouring developments which may prejudice their continuing efficient operation. It states:

“Where non-waste development is proposed within 250m of safeguarded sites, or within 400m of a Water Recycling Centre, the relevant Local Planning Authority is required to consult the Waste Planning Authority on the proposed non-waste development (except for those developments defined as ‘Excluded’ in ‘Appendix C - Development Excluded from Safeguarding Provisions’).

Proposals which are considered to have the potential to adversely impact on the operation of a safeguarded waste site or infrastructure, including the site allocations within this Plan, are unlikely to be opposed where:

- a) *a temporary permission for a waste use has expired, or the waste management use has otherwise ceased and the site or infrastructure is considered unsuitable for a subsequent waste use; or*
 - b) *redevelopment of the waste site or loss of the waste infrastructure would form part of a strategy or scheme that has wider environmental, social and/or economic benefits that outweigh the retention of the site or the infrastructure for the waste use, and alternative provision is made for the displaced waste use; or*
 - c) *a suitable replacement site or infrastructure has otherwise been identified and permitted”.*
- 2.6.4 Parts of the Order Limits fall within two WCAs, associated with Boreham Recycling Centre and Bulls Lodge Inert Waste Recycling Centre. The Order

Limits, identified waste sites above and the WCAs associated with them are shown on **Figure 2-1**, below.

Essex Minerals Local Plan (2014)

- 2.6.5 ECC adopted the Essex Minerals Local Plan in July of 2014. The plan provides planning policies for minerals development in Essex until 2029 and identifies future sites for mineral development. It also includes ways to reduce reliance on primary mineral resources in Essex.
- 2.6.6 The Local Plan comprises:
- a. The Minerals Core Strategy, which sets out the long-term direction for minerals development and a plan to deliver this;
 - b. Development management policies for minerals planning;
 - c. Strategic site allocations and safeguarding for mineral extraction; and
 - d. A Policies Map, showing site locations.
- 2.6.7 Appendix 3 of the Local Plan identifies Strategic Aggregate Recycling Sites (SARS) within Essex. Paragraph 3.74 of the Minerals Local Plan states *“The broad approach of the Plan is to “Safeguard the County’s existing network of SARS from redevelopment for non-minerals development to maintain their aggregate recycling capacity into the future, and Set out positive policy criteria to enable developers to bring forward proposals for new SARS in appropriate locations in response to the market.”*
- 2.6.8 Policy S5 relates to creating a network of aggregate recycling facilities, and states (inter alia):
- “The increased production and supply of recycled/ secondary aggregates in the County is supported to reduce reliance on land-won and marine-won primary aggregates. The County’s existing network of aggregate recycling facilities shall be maintained and expanded wherever appropriate. In addition:*
1. *Existing Strategic Aggregate Recycling Sites (SARS) identified on the Policies Map and defined in the map in Appendix 3 will be safeguarded from development that might result in their closure earlier than their permission. There is a general presumption that existing SARS should remain in operation for the life of the permission.*
 2. *The Local Planning Authority shall consult the Minerals Planning Authority for its views and take them into account before determining development proposals that would compromise the continued operation and potential of an existing SARS.”*
- 2.6.9 As shown by **Figure 2-1**, below, as well as falling within a WCA, the Order limits also fall within a Minerals Safeguarding Area (MSA) and Minerals Consultation Area (MCA), as defined in the Essex Minerals Local Plan (2014). To address this, a separate Minerals Safeguarding Assessment (MSA) and a Minerals Infrastructure Impact Assessment (MIIA) have also been prepared, to assess the impact of the Scheme on minerals resources/ safeguarding and minerals infrastructure respectively.

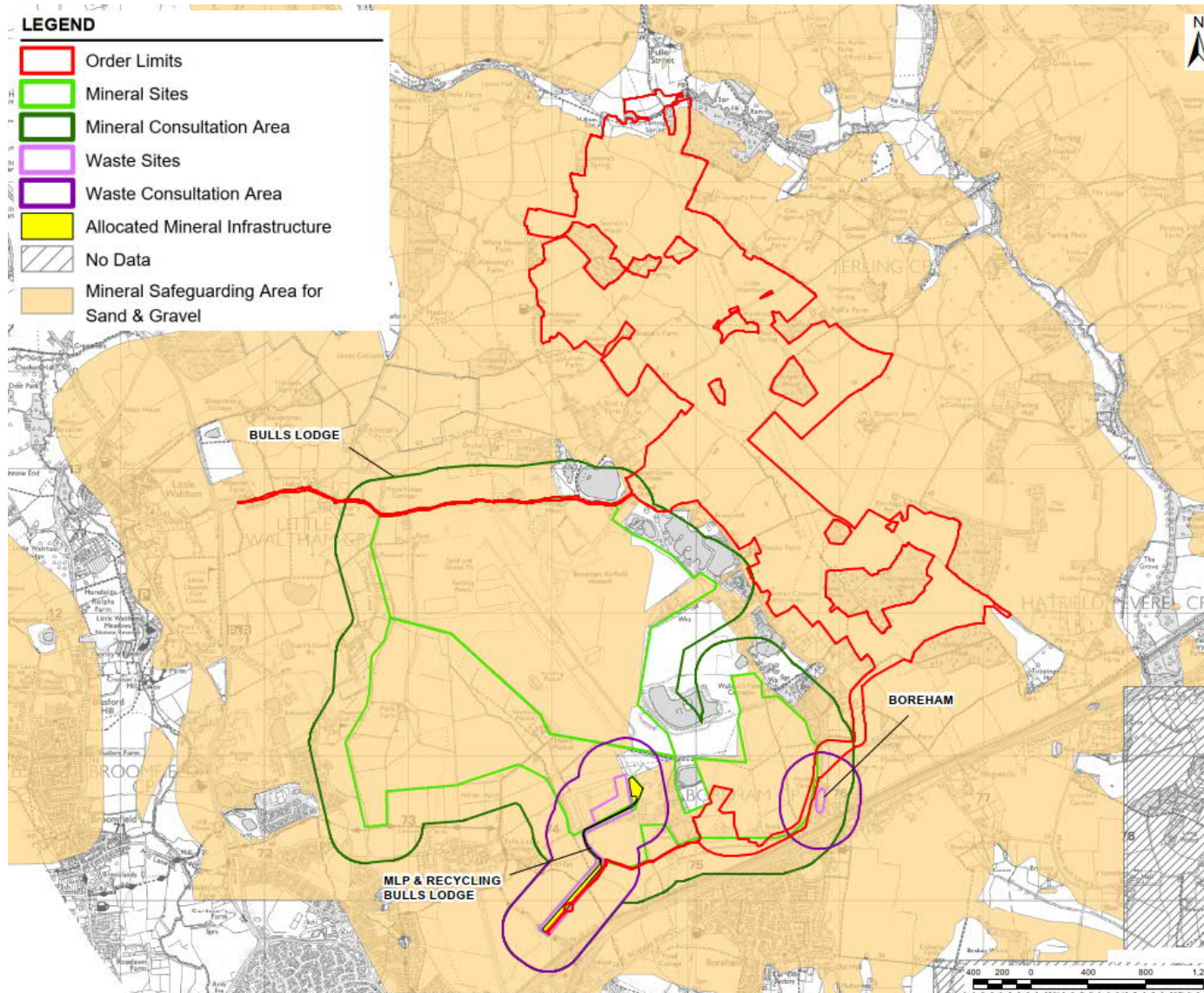


Figure 2-1: Spatial Representation of Minerals and Waste Designations in Relation to the Proposed Development, according to the Essex Minerals Local Plan (2014) and Essex and Southend-on-Sea Waste Local Plan (2017)

Braintree District

- 2.6.10 The saved policies of the Local Plan Review (2005), the 2011 Core Strategy, the Local Plan (2013-2033) Section 1 (adopted February 2021) and the Hatfield Peverel Neighbourhood Development Plan 2015–2033 (adopted December 2019) do not contain any policies which relate specifically to waste development or waste management and are therefore not considered further.

Chelmsford City

- 2.6.11 The Chelmsford Local Plan 2013-2036 was adopted by Chelmsford City Council in May 2020. The Local Plan outlines the strategic priorities and long-term vision for Chelmsford and identifies locations for delivering housing and other strategic development needs such as employment, retail, leisure, community and transport development. It contains a Spatial Strategy to deliver this vision. The Chelmsford Local Plan 2013-2036 does not contain any policies which relate specifically to waste development or waste management and are therefore not considered further.

3. Considerations

3.1 Boreham Recycling Centre

- 3.1.1 The Essex and Southend-on-Sea Waste Local Plan (2017) and accompanying policies map identify waste infrastructure and designations within Essex and Southend-on-Sea.
- 3.1.2 Paragraph 6.7 of the Plan states that “*Safeguarding will be implemented through Waste Consultation Areas which are defined around all permitted waste developments... and sites allocated in this Plan*”. Policy 2 states with regard to WCAs that “*Where non-waste development is proposed within 250m of safeguarded sites, or within 400m of a Water Recycling Centre, the relevant Local Planning Authority is required to consult the Waste Planning Authority on the proposed non-waste development.*”
- 3.1.3 Boreham Recycling Centre, operated by European Metal Recycling (EMR) (and formerly operated by SITA UK), is a waste transfer and metal recycling site, authorised to handle municipal solid waste, commercial and industrial waste, metals (ferrous and non-ferrous) and end of life vehicles.
- 3.1.4 It is located to the immediate southeast of Bulls Lodge Quarry and to the immediate north of the Boreham Interchange on the A12 (as shown by **Figure 2-1**, above). It is located approximately 1.2 miles northeast of Boreham and 4.6 miles from Chelmsford. The site covers approximately 1 hectare, and is accessed via an access track shared with the neighbouring units on the industrial estate, which links to Waltham Road. It is well screened by mature trees on three sides.

The Order limits (Work No. 4, Grid Connection Route) is adjacent the Boreham Recycling Centre and within the WCA associated with it (See Figure 2-4), as shown by **Figure 2-1**, above.

3.1.5 The land that comprises the Boreham Recycling Centre site was first developed in 1975, for the servicing and repair of motor vehicles, industrial machinery and plant (planning permission ref. CHL/252/74). The key planning history associated with Boreham Recycling Centre is summarised in **Table 3-1**, below.

Table 3-1: Key planning history associated with Boreham Recycling Centre (application reference, description and decision date)

App. Ref.	Location	Description	Status
ESS/06/12/CHL	Boreham Metals Recycling Depot, Waltham Road, Industrial Estate, Boreham	The redevelopment of the Waste Transfer Station comprising the demolition of the existing storage building, construction of a new Waste Transfer Station building, a fenced off container tipper area, new weighbridge, realignment of the existing non-ferrous recycling area to include construction of an additional storage bays and part retrospective application for 2 x two storey portacabin offices, a single storey portacabin extension for the weighbridge office, a small Non Ferrous office and surface water drainage improvements	Granted 09/08/2012
03/02300/FUL	S B Wheeler & Sons Industrial Estate Waltham Road Boreham Chelmsford Essex	Construction of new workshop building in connection with scrap processing.	Granted 26/01/2004
00/01889/FUL	S B Wheeler & Sons Industrial Estate Waltham Road Boreham Chelmsford Essex	The transferring, bulking up, storage and recycling of waste, including wood, paper, metal, plastic, rubble and rubber etc.	Granted 22/01/2001
99/01576/FUL	Recycling Centre Boreham Industrial Estate Waltham Road Boreham Chelmsford	Retention of material reclamation facility plant	Granted 10/03/2000
99/00393/FUL	Boreham Scrap Co Industrial Estate Waltham Road Boreham Chelmsford	Retention of concrete hardstanding with impermeable raised kerbing at perimeter. Retention of 2.8m sleeper retaining fence to north boundary. Erection of three 1.8m high sections of chain link fencing to east boundary.	Granted 14/05/1999
92/05043/FUL (92/CHL/1344)	Recycling Centre Boreham Industrial Estate Waltham Road Boreham Chelmsford	Continuance of use of site as a yard for the breaking of motor vehicles and as a centre for the recovery of used materials suitable for recycling and reuse, with areas for the storage of general waste prior to transfer to disposal sites.	Granted 19/01/1993

App. Ref.	Location	Description	Status
CHL/252/74	Walton Road, Boreham	Construction of building for the repair and servicing of the company's plant vehicles and machinery	Granted 22/07/1975
CHL/752/70	Walton Road, Boreham	Tree planting	Granted 19/01/1971
M/CHL/245/63	Walton Road, Boreham	Construction of building for storage purposes and facilities for a motor repair facility	Granted 26/11/2963

3.2 Bulls Lodge Inert Recycling

- 3.2.1 Bulls Lodge Inert Recycling, operated by Eurovia, is located within Hanson's Bulls Lodge Quarry, Generals Lane, Boreham, Chelmsford. Bulls Lodge Quarry is a sand and gravel quarry, located approximately 1.3 km to the north east of Chelmsford. Historically, the primary vehicular access lies off Generals Lane and the A12 / A130 / A138 Boreham Interchange. The primary access to Bulls Lodge Quarry has changed recently as a result of the construction of the Radial Distributor Road.
- 3.2.2 Bulls Lodge Inert Recycling is an aggregate recycling facility. Eurovia have leased the site from Hanson since 2013, following the departure of the previous operator, and it continues to operate as an inert waste recycling facility for highway materials, which is largely contract work. The operation of the site is linked to the life of the Bulls Lodge Quarry planning permissions.
- 3.2.3 Planning permission was originally granted for "*the importation of recyclable inert materials for processing through a mobile crusher & screening unit for distribution as recycled aggregate*" in 1998 (permission ref. ESS/37/98/CHL). The inert recycling facility has a relatively complex planning history, which is summarised in **Table 2**, below.

Table 3-2: Recent planning history associated with Bulls Lodge Inert Recycling (application reference, description and decision date)

App. Ref.	Description	Status
ESS/44/19/ CHL	Continuation of inert waste recycling facility which includes screening and crushing and a washing plant as permitted by ESS/10/17/CHL without compliance with condition 7 (temporary period for night-time waste deliveries until Feb 2019) to allow night-time deliveries for a temporary period of 2 years to 2021 (part retrospective)	Granted 30/09/2019
ESS/44/17/ CHL	Change of use of part of inert waste recycling facility (as permitted by ESS/15/15/CHL) to area for storage of road materials and installation of replacement office	Granted 04/10/2017
ESS/10/17/ CHL	Continuation of inert waste recycling facility which includes screening and crushing and a washing plant as permitted by ESS/15/15/CHL, with a change of use of part of the inert waste recycling site for the storage of road materials for a temporary period of 5 years	Granted 28/03/2017

App. Ref.	Description	Status
ESS/15/15/ CHL	Continuation of the existing inert recycling facility which includes screening and crushing and a washing plant and a lorry parking area for the distribution of aggregates products as permitted by planning permission ESS/56/13/CHL, without compliance with condition 2 (application details) to allow amended site layout, condition 16 (maximum stocking tonnage) to allow stockpiling of not more than 60,000 tonnes of unprocessed or processed waste/aggregate, and condition 22 (stockpile heights) to allow stockpile heights to the height of the adjacent screening bund	Granted 05/11/20 15
ESS/28/14/ CHL	Use of previously imported materials for the construction and expansion of a screening bund to the existing recycling facility and to achieve revised restoration of former silt lagoons to biodiversity areas. In addition approval under condition 42 of Planning Permission CHL/1890/87 to allow importation of 12,000m ³ of clean soils and clays for restoration purpose	Granted 01/12/20 14
ESS/56/13/ CHL	Continuation of the existing inert recycling facility which includes screening and crushing and a washing plant and a lorry parking area for the distribution of aggregates products as permitted by planning permission ESS/25/08/CHL, without compliance with condition 5 (hours of operation - 0700 to 1800 Mon - Fri and 0700-1300 Saturdays) to allow the delivery only of waste materials to the facility between the hours of 1800 and 0300 Monday to Sunday.	Granted 23/01/20 14
ESS/25/08/ CHL	Retention and extension of the existing inert recycling facility which includes screening and crushing and the introduction of a washing plant at the recycling facility. In addition the creation of a lorry parking area for distribution of aggregate products	Granted 15/09/20 08
ESS/46/03/ CHL	Night time delivery (Mon.-Fri. only) of waste arising from road maintenance/repair contracts & the delivery of premix concrete from Bulls Lodge Quarry to such contracts without compliance with condition 6 attached to pp ESS/37/98/CHL	Granted 20/04/20 04
ESS/37/98/ CHL	The importation of recyclable inert materials for processing through a mobile crusher & screening unit for distribution as recycled aggregate.	Granted 09/10/19 98

3.2.4 The Bulls Lodge Inert Recycling site is defined in the Essex Minerals Local Plan (2014) (Appendix 4) as a Strategic Aggregate Recycling Site (SARS), as shown by **Figure 3-1**, below. The WCA covers 250m around the boundary of the site.

3.2.5 Bulls Lodge Inert Recycling and the WCA associated with it are located approximately 200 m north-west of the Bulls Lodge Substation Extension, where the proposed Solar Farm will connect into the National Grid. The access to the recycling site is via Generals Lane and the access track shared with Bulls Lodge Quarry. Part of the access road to Bull's Lodge Quarry (between Generals Lane and the junction with the access to Brick House Farm) is proposed as the access for construction works at Bulls Lodge substation as part of the Scheme (Work No. 9, Site Access)

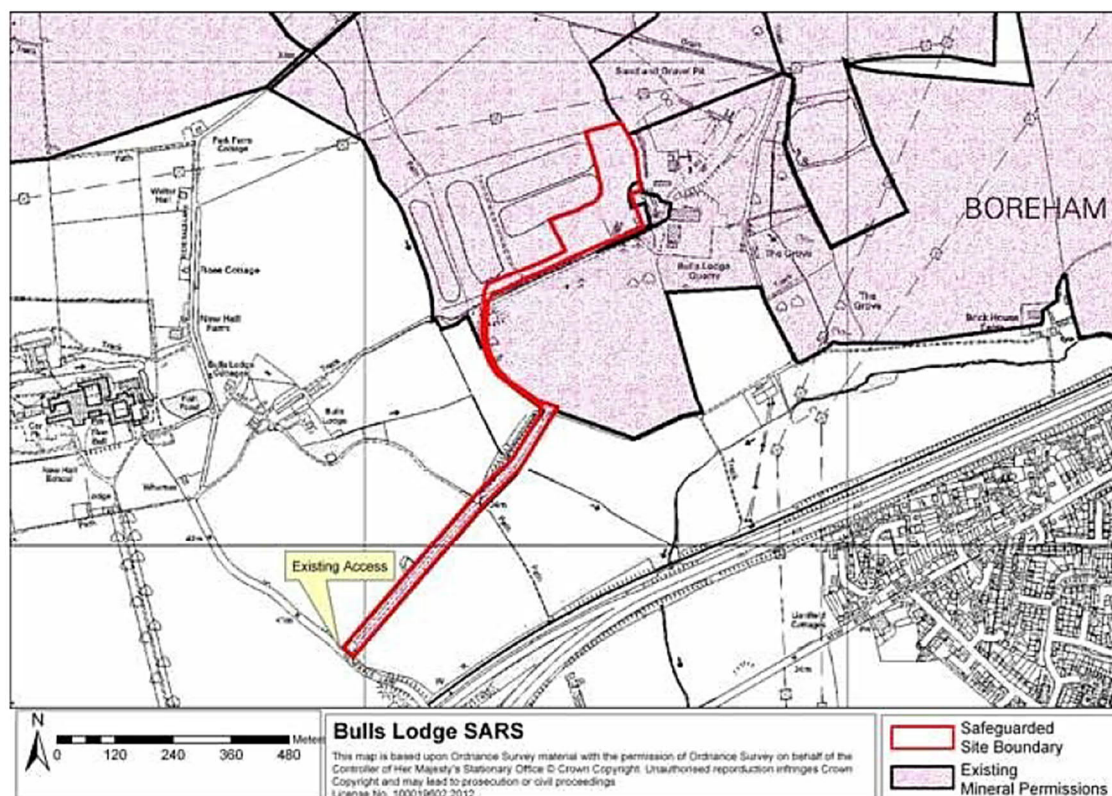


Figure 3-1: Bulls Lodge Quarry Strategic Aggregate Recycling Site (SARS), as defined in the Essex Minerals Local Plan (2014) (Appendix 4)

4. Potential Impact of Safeguarded Waste Infrastructure Upon the Scheme

4.1 Introduction

4.1.1 When considering the location of the Scheme, the existing and allocated waste management facilities in the vicinity must also be considered. As stated above, the WCAs associated with Boreham Recycling Centre and Bulls Lodge Inert Recycling both fall within the Order limits.

4.2 Principle of Agent of Change

4.2.1 Paragraph 187 of the National Planning Policy Framework (NPPF) (2021) states that:

“Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new

development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed."

4.2.2 The potential for impacts arising from Bulls Lodge Inert Recycling and Boreham Recycling Centre upon the Scheme is assessed below in relation to noise, dust and lighting.

4.2.3 The Scheme does not consist of residential or employment uses and therefore does not introduce new sensitive receptors which may be affected by the continued operation of either the Boreham Recycling Centre or Bulls Lodge Inert Recycling from emissions such as noise, dust, odour and lighting. Therefore, the Scheme will not prejudice the continued operation of the Boreham Recycling Centre or Bulls Lodge Inert Recycling.

4.3 Noise

4.3.1 The Scheme will not be sensitive to noise associated with the operation of Boreham Recycling Centre or Bulls Lodge Inert Recycling.

4.4 Dust

4.4.1 The Scheme will not be affected by the dust impacts of ongoing operations at Boreham Recycling Centre or Bulls Lodge Inert Recycling, or from HGV traffic associated with these using either Waltham Road or General's Lane and the Bull's Lodge Quarry access respectively. Any dust deposited on the solar arrays will be removed by cleaning.

4.5 Odour

4.5.1 The operational activities at Boreham Recycling Centre or Bulls Lodge Inert Recycling are unlikely to generate odour due to the inert nature of the wastes. As such it is not a relevant consideration.

4.6 Visual and Lighting

4.6.1 The Scheme will be unattended when operational except for occasional maintenance. As such it is not a sensitive visual receptor and will not be affected by the visual or lighting impacts of operations at Boreham Recycling Centre or Bulls Lodge Inert Recycling.

4.7 Traffic

4.7.1 The construction and maintenance traffic associated with the construction of the PV elements of the Scheme would access the trunk road network at Boreham Interchange on the A12 from the north via the A130. There would therefore be no conflict with the access to Boreham Recycling Centre on Waltham Road, which would access the A12 from the south via the B1137 and Boreham Junction. Construction traffic accessing Bulls Lodge Substation would share Generals Lane with the access to Bulls Lodge Inert Recycling.

4.7.2 During the peak construction phase of the Bulls Lodge Substation Extension, the Scheme is expected to result in a maximum of 46 HGVs and 22 LGVs per day on the private road to/from the substation. This equates to a maximum of 68 daily vehicles, resulting in an average of 5-6 vehicles arriving or departing per hour between 7am and 7pm. These additional trips are not expected to

affect the operation of the private road from a capacity perspective, including with the operation of Bulls Lodge Inert Recycling. In addition, the Transport Assessment, which is **Appendix 13A** to the **Environmental Statement [EN010118/APP/6.2]** demonstrates that the Scheme is expected to have a negligible impact on the operation of the Boreham Interchange.

- 4.7.3 The private road was previously upgraded to accommodate the original construction of Bulls Lodge Substation, where it would have been shared between construction traffic and existing users. The extension of Bulls Lodge Substation as part of the Scheme will effectively replicate this scenario which has occurred previously.

4.8 Capacity

- 4.8.1 The Scheme will have no impact on the operational capacity of Boreham Recycling Centre as no traffic associated with the Scheme will use the section of Waltham Road south of Boreham Recycling Centre and there will also be no more than a negligible impact on the capacity of Boreham Interchange as a result of the construction and operation of the Scheme.

5. Conclusion

- 5.1.1 To conclude, based upon the above, it is not considered that the Scheme would experience significant adverse impacts as a result of the ongoing operations at Boreham Recycling Centre or Bulls Lodge Inert Recycling, and that Boreham Recycling Centre and Bulls Lodge Inert Recycling sites would not experience any significant adverse impacts as a result of the Scheme. As such, no additional mitigation measures are required.
- 5.1.2 During the peak construction phase of the Bulls Lodge Substation Extension, the Scheme is expected to result in a maximum of 46 HGVs and 22 LGVs per day on the private road to/from the substation. This equates to a maximum of 68 daily vehicles, resulting in an average of 5-6 vehicles arriving or departing per hour between 7am and 7pm. These additional trips are not expected to affect the operation of the private road from a capacity perspective, including with the operation of Bulls Lodge Inert Recycling. In addition, the Transport Assessment, which is **Appendix 13A** to the **Environmental Statement [EN010118/APP/6.3]** demonstrates that the Scheme is expected to have a negligible impact on the operation of the Boreham Interchange. The Scheme will have no impact on the operational capacity of Boreham Recycling Centre as no traffic associated with the Scheme will use the section of Waltham Road south of Boreham Recycling Centre and there will be more than a negligible impact on the on the capacity of Boreham Interchange.
- 5.1.3 The Scheme is therefore not expected to impact the capacity of Bulls Lodge Inert Recycling as a result of shared usage of Generals Lane and the part of the Bull's Lodge Quarry access road which is located within Work No. 9 (Site Access Works).
- 5.1.4 Overall, it therefore follows that the Scheme complies with Policy 2 (Safeguarding Waste Management Sites and Infrastructure) of the Essex and Southend-on-Sea Waste Local Plan (2017), and Policy S5 of the Essex

Minerals Local Plan which requires that development proposals for non-waste development within WCAs do not adversely impact on the operation of safeguarded waste sites or infrastructure, including site allocations.