

**Response to Planning Application ESS/23/25/BTE - Continuation of development of the Integrated Waste Management Facility (IWMF) without compliance with or through amendments to several conditions of ESS/39/23/BTE.**

16<sup>th</sup> May 2025

Dear Ms. Tomalin,

Bradwell with Pattiswick Parish Council **object** to several of the proposed condition deletions and amendments within this application. Many of the original conditions were implemented to mitigate significant impacts on visual amenity, local character, noise, pollution, and the countryside. These remain valid planning concerns. The proposals appear to introduce greater negative environmental and community impacts and reduce planning control and transparency.

In several areas, there is also insufficient information to make a fully informed judgement. We have outlined where clarification is necessary, and until such clarification is provided, we reserve our position.

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**Condition-by-Condition Comments:**

**Condition 17 (Visible Plume) – OBJECT**

- No evidence has been submitted to confirm that the visible plume is only water vapour.
- The condition was originally imposed for landscape and visual amenity reasons, consistent with WLP Policies 10 and 12 and BDLP policies LPP42, LPP52, LPP66, and LPP70.
- Removing the condition would permit visible emissions, potentially resulting in significant harm to the open countryside character and local receptors. The policies cited remain relevant and valid.

**Condition 39 (Noise between 1900-2300 hrs) – OBJECT**

- Extending operational noise limits into the evening hours undermines local amenity, particularly for nearby residents during a sensitive time.
- We maintain that the original limitation between 07:00–19:00 is reasonable and necessary to protect public health and tranquillity in the evenings.

**Condition 3 (Waste Delivery Hours) – OBJECT**

- The applicant seeks to amend delivery hours for the Waste Disposal Authority (Essex County Council), yet ECC is also the determining authority. This presents a clear conflict of interest.
- Decisions should be made independently and transparently, with adequate scrutiny.

**Condition 8 (Vehicle Access via Woodhouse Lane) – NO COMMENT**

**Conditions 15, 19, 21 (Phased Submissions/Provision) – COMMENT – CLARIFICATION REQUIRED**

- What specific elements are being phased?
- What is the proposed timeline for phased submissions and completions?
- Without this detail, it is not possible to assess the potential impact on planning control, enforcement, or environmental mitigation.

**Condition 23 (Rising Main) – COMMENT**

- We note the temporary 3-year approval by the Environment Agency. There is concern that no permanent solution has yet been secured, and temporary permissions are being extended repeatedly.
- A clear plan for transitioning to a permanent water discharge solution must be submitted.

**Condition 26 (Process Water – Paper Pulp Plant) – COMMENT**

- No information is available online detailing the proposed process water changes.
- Please clarify: What is the nature of the proposed changes? Will they involve greater abstraction, higher pollution risk, or discharge volumes?

**Condition 27 (Waste Origin – Remove Essex and Southend Restriction) – OBJECT**

- This change is contrary to WLP Policy 10 and 11, which emphasise the self-sufficiency principle and the prioritisation of locally-generated waste.
- We oppose expansion of catchment areas, especially without updated environmental assessments or justification.

**Condition 29 (Define Waste Types) – OBJECT + REQUEST CLARIFICATION**

- There is insufficient information on how waste types are being redefined.
- Clarify:
  - What are the proposed waste types?
  - Are any of these hazardous or contain POPs?
  - How do the proposed waste types differ from the original permission?
- We do not support an open-ended amendment that potentially introduces more polluting or disruptive waste types.

**Condition 35 (Night-time Construction) – OBJECT**

- Construction outside of standard hours should only occur in exceptional, emergency situations, not as a matter of course.
- The list of allowable night works is too broad and risks repeated disturbance.
- How will residents and the council be notified and consulted on such works? A clear protocol is essential.

**Condition 36 (Waste Delivery Hours – Saturdays/Sundays) – OBJECT**

- As above with Condition 3, ECC cannot impartially determine its own operating flexibility.
- Please provide full details of the proposed changes and rationale, including environmental and traffic impact assessments.

**Condition 38 (Noise Limits – Extension to 23:00 hrs) – OBJECT**

- The proposal will result in prolonged community exposure to industrial noise, which is unacceptable in a rural setting.
- The original hours were established for sound reasons and should remain in place.

**Conditions 40 & 41 (Noise Monitoring Period and Assessment Locations) – OBJECT**

- Stick to the original policy.
- Measurement periods should remain at 5 minutes, not extended to 15 minutes, as shorter periods provide better responsiveness to noise peaks.
- Clarification is needed on the updated monitoring locations—will these provide equivalent or better sensitivity?

**Conditions 43 & 44 (Lighting) – COMMENT**

- Clarify: Will any changes extend beyond construction? Please confirm that operational lighting will remain fully controlled and minimised.

**Conditions 51, 52, 54 (Dust, Odour, Habitat Management) – COMMENT – CLARIFICATION REQUIRED**

- What does “phased submission” mean in these contexts?
- For Condition 54, what specific updates are being proposed to the habitat management plan, and what are the ecological implications?

**Condition 56 (Stack) – COMMENT**

- Please provide the exact amended wording so we can form an informed opinion.

**Condition 61 (Parking Area Wording) – COMMENT**

- What is the current wording and what is the proposed clarification?

**Condition 68 (Woodhouse Farm Museum) – COMMENT**

- The proposed extension is noted, but when is the anticipated completion date? What safeguards are in place to ensure delivery?

**Conditions 69, 70, 71 – NO COMMENT**

We **strongly object** to several condition deletions and amendments that would weaken environmental, landscape, and amenity safeguards without sufficient justification or detail. In multiple instances, insufficient information prevents a proper understanding of the implications.

We urge the planning authority to:

- Uphold original protections where justified;
- Seek detailed clarifications before any determination; and
- Ensure transparency and community confidence in the process, particularly where Essex County Council has a dual role.