



County Offices
Newland
Lincoln
LN1 1YL

29 October 2018

Executive

A meeting of the Executive will be held on **Tuesday, 6 November 2018** in **Committee Room One, County Offices, Newland, Lincoln LN1 1YL** at **10.30 am** for the transaction of business set out on the attached Agenda.

Yours sincerely

A handwritten signature in black ink that reads 'Keith Ireland'.

Keith Ireland
Chief Executive

Membership of the Executive
(8 Members of the Council)

Councillor M J Hill OBE, Executive Councillor for Resources and Communications (Leader of the Council)

Councillor Mrs P A Bradwell OBE, Executive Councillor for Adult Care, Health and Children's Services (Deputy Leader)

Councillor C J Davie, Executive Councillor for Economy and Place

Councillor R G Davies, Executive Councillor for Highways, Transport and IT

Councillor E J Poll, Executive Councillor for Commercial and Environmental Management

Councillor Mrs S Woolley, Executive Councillor for NHS Liaison and Community Engagement

Councillor C N Worth, Executive Councillor for Culture and Emergency Services

Councillor B Young, Executive Councillor for Community Safety and People Management

**EXECUTIVE AGENDA
TUESDAY, 6 NOVEMBER 2018**

Item	Title	Forward Plan Decision Reference	Pages
1	Apologies for Absence	~	
2	Declarations of Councillors' Interests	~	
3	Announcements by the Leader, Executive Councillors and Executive Directors	~	
4	Minutes of the Meeting of the Executive held on 2 October 2018	~	5 - 12

KEY DECISIONS - ITEMS TO BE RESOLVED BY THE EXECUTIVE

5	Building Communities of Specialist Provision for Children and Young People with Special Educational Needs and Disabilities <i>(To receive a report from the Executive Director of Children's Services which presents the 'Building Communities of Specialist Provision Strategy' to the Executive for consideration and approval)</i>	I015623	13 - 180
6	Joint Municipal Waste Management Strategy <i>(To receive a report by the Senior Commissioning Officer (Waste) which invites the Executive to endorse the proposed Joint Municipal Waste Management Strategy and to recommend its adoption by the County Council at its meeting on 14 December 2018)</i>	I016468	181 - 350

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Please Note: for more information about any of the following please contact the Democratic Services Officer responsible for servicing this meeting

- Business of the meeting
- Any special arrangements
- Copies of reports

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**EXECUTIVE
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PRESENT: COUNCILLOR M J HILL OBE (LEADER OF THE COUNCIL)

Councillors C J Davie (Executive Councillor for Economy and Place), R G Davies (Executive Councillor for Highways, Transport and IT), Mrs S Woolley (Executive Councillor for NHS Liaison and Community Engagement) and B Young (Executive Councillor for Community Safety and People Management).

Councillors Mrs M J Overton MBE and R B Parker (Chairman of the Overview and Scrutiny Management Board) were also in attendance.

Officers in attendance:-

Keith Ireland (Chief Executive), Debbie Barnes OBE (Executive Director, Children's Services), Sam Edwards (Major Schemes and Design Commissioner), David Forbes (County Finance Officer), Justin Hackney (Assistant Director, Specialist Adult Services), Cheryl Hall (Democratic Services Officer), Mark Heaton (Programme Leader), Andrew McLean (Service Manager Commissioning), Pete Moore (Executive Director, Finance and Public Protection), Sophie Reeve (Chief Commercial Officer) and Nigel West (Head of Democratic Services and Statutory Scrutiny Officer).

22 APOLOGIES FOR ABSENCE

Apologies for absence were received from Councillors Mrs P A Bradwell OBE, E J Poll and C N Worth.

It was also noted that Justin Hackney (Assistant Director, Specialist Adult Services) was attending the meeting on behalf of Glen Garrod (Executive Director of Adult Care and Community Wellbeing).

23 DECLARATIONS OF COUNCILLORS' INTERESTS

There were no declarations of interest.

24 ANNOUNCEMENTS BY THE LEADER, EXECUTIVE COUNCILLORS AND EXECUTIVE DIRECTORS

The Executive Councillor for Economy and Place was pleased to announce that Lincolnshire would further strengthen its economic ties with China's Hunan province in October 2018, as Lincolnshire and Hunan become sister regions.

It was advised that on Thursday 11 October 2018, representatives from the province, led by Mr Kemin Wang, Deputy Director of Standing Committee of Hunan Provincial

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People's Congress, would visit the county to sign a formal Lincolnshire-Hunan Sister Region agreement.

The Executive Councillor for NHS Liaison and Community Engagement wished to congratulate Lincolnshire Community Health Services NHS Trust for being rated 'Outstanding' by the Care Quality Commission.

25 MINUTES OF THE MEETING OF THE EXECUTIVE HELD ON
4 SEPTEMBER 2018

RESOLVED

That the minutes of the meeting of the Executive held on 4 September 2018 be signed by the Chairman as a correct record.

26 REVENUE AND CAPITAL BUDGET MONITORING REPORT 2018/19

A report from the Executive Director of Finance and Public Protection was considered, which provided an update on spending compared with budgets for the financial year which started on 1 April 2018.

The tables in the report had shown the actual income and expenditure for four months of the financial year, along with the projections for spending and a comparison of the projections against the approved budgets.

The County Finance Officer advised that the total revenue spending was predicted to be £3.738m less than the total budget (excluded projected underspending on Schools budgets); general reserves at the year-end were forecast to be within the 2.5% to 3.5% range; and net capital spending was projected to be £0.656m more than the budget at the end of the financial year.

The Executive was directed to Table A (Position as at 31 July 2018) on page 13 of the report, which detailed Revenue expenditure. The following points were noted: -

- Over its four commissioning strategies, Children's Services was currently forecasting an underspend of £1.177m;
- Readiness for Adult Life commissioning strategy was forecasting an underspend of £0.361m. The majority of the underspend had related to the Local Authority's legal duty for Supported Accommodation;
- The Children are Safe and Healthy commissioning strategy was forecasting an underspend of £0.900m. The underspend had related to the funding of central staffing costs temporarily in 2018/19 from grants, and the lower occupancy rates at the Beacon development which was currently being reviewed;
- Enablers and Support to Council's Outcomes was currently forecasting an underspend of £1.950m. It was highlighted that a number of ICT projects were underway and the completion of those projects would reduce the underspend;
- 'Other Budgets' was currently projecting an underspend of £0.610m. The vast majority of the underspend was attributed to the National Living Wage.

Following initial work during the financial year, it was anticipated that this element of the budget would not be required during the financial year 2018/19, as it was now clear sufficient funding had already been provided in service budgets.

Table B (Position as at 31 July 2018) on page 21 of the report detailed the capital programme. It was highlighted that the Historic Lincoln project was currently showing an overspend of £1.338m. The final claim for Heritage Lottery Funding for Lincoln Castle Revealed would be submitted shortly, and all final accounts would need to be settled by this time. Officers were working to ensure that all grant income was received, and a final budget position would be known at that stage.

The Chairman of the Overview and Scrutiny Management Board advised that the Board had considered the Executive report on Revenue and Capital Budget Monitoring 2018/19 at its meeting on 27 September 2018. The Board had agreed to support the recommendation in the Executive report. The comments of the Board were tabled at the meeting.

It was highlighted that the Board had noted that the main reason for a forecast underspend in the Readiness for Adult Life Commissioning Strategy was a more suitable and cost effective supported accommodation solution for care leavers and young homeless people. It was highlighted that the use of former fire houses in Grantham for this purpose was an example of how future savings could be generated.

The Chairman also highlighted that the Board had discussed in detail the ICT revenue underspend. Furthermore, the Chief Executive advised that the ICT strategy would be issued in draft form by the end of the calendar year 2018.

It was highlighted that work was being undertaken on the County Council's website, which would improve the customer experience.

The Leader commended the hard work of Adult Care and Children's Services in keeping within their budget allocation during financially challenging times.

RESOLVED

That the current position on the revenue and capital budgets be noted.

27 NORTH HYKEHAM RELIEF ROAD

Consideration was given to a report by Mark Heaton (Programme Leader) and Sam Edwards (Senior Project Leader (Major Schemes)), which invited the Executive to consider recommendations relation to the proposed North Hykeham Relief Road.

The Executive Councillor for Highways, Transport and IT introduced the report to the Executive, and advised that the proposed project would improve connections around and into Lincoln and form part of the Lincolnshire Coastal Highway. The feedback from public engagement events had been positive.

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The Programme Leader presented the report to the Executive and in doing so advised that the North Hykeham Relief Road would be a major infrastructure project aimed to complete the final phase of the circulatory around Greater Lincoln and North Hykeham by linking the Lincoln Eastern Bypass (at the A15 Sleaford Road) with the existing Western Bypass (at its junction with Newark Road).

The report sought approval for the length and type of carriageway, prior to the completion of the Outline Business Case. The report also sought approval for the proposed project funding sources and associated percentages/values. The Outline Business Case (OBC) would be key in justifying funding opportunities from governmental bodies, such as the Department for Transport.

It was highlighted that project funding was the next stage of the development of the North Hykeham Relief Road, therefore creating the need for the completion of the OBC for submitting to the Department for Transport (DfT). The DfT had advised that the next opportunity for submitting a funding bid would be in late 2018/early 2019.

Page 35 of the agenda pack included a table which depicted what the Executive Project Board had decided would be the most efficient bid when balancing affordability and likelihood of success. The requested project contribution from the DfT was proposed as 70% of the overall cost of the project, with the remainder being funded by Lincolnshire County Council and developer funding contributions.

It was highlighted that the Highways and Transport Scrutiny Committee had met on 10 September 2018 and had considered a report on the North Hykeham Relief Road. The Committee had considered the length and type of carriageway, prior to the completion of the OBC and had unanimously supported the recommendations included in the report to the Executive. Comments of the Committee were detailed on page 39 of the report.

RESOLVED

- (1) That approval be given to a dual carriageway from the A46 (Pennells' roundabout) to connect with the roundabout at the A15 (currently being constructed as part of the Lincoln Eastern Bypass) as opposed to either a single or single + future-proofed carriageway as the Council's preferred carriageway option in all future development of the NHRR including the making of funding bids.
- (2) That approval be given to seeking funding from governmental bodies such as the DfT in line with the percentages/values contained in the body of this paper.
- (3) That delegated authority be given to the County Commissioner for Economy and Place for approving the final form of the Outline Business Case (at the point when the bidding opportunity is announced) and submission of the same.

28 CORPORATE SUPPORT SERVICES RE-COMMISSIONING

Consideration was given to a report by Sophie Reeve (Chief Commercial Officer) and Andrew McLean (Chief Commissioning Officer), which sought approval of four recommendations concerning the Corporate Support Services Re-commissioning.

The Chief Commercial Officer presented the report to the Executive and in doing so advised that a review had been undertaken to consider possible alternative commissioning approaches to the existing Serco contract, as detailed in the report and in the background reports.

The review work had included an assessment of the Serco contract extension proposal along with a consideration of how the Council's corporate centre could be more effective in supporting staff and front-line services. In addition, further activity had been undertaken following the decision made by the Executive on 1 May 2018 on: carrying out the necessary due diligence and assurance of the potential Payroll/HR Admin service and ERP system solution with Hoople, along with market engagement with potential ICT suppliers.

It was highlighted that Serco's performance had improved and was currently performing well against contract measures. An extension of the existing contract with Serco would provide continuity of services at a time when the Council needed to focus on stabilising and developing its ICT. To pursue a procurement at the same time as carrying out this work would present unacceptable risks of failure while going to the market when existing issues had not yet been resolved.

It was therefore recommended that the Council entered into a contract extension with Serco for a period of two years, with effect from 1 April 2020 to 31 March 2022 to include the following: Information Management Technology; Payroll; HR Administration; Customer Service Centre; and Exchequer Services and Adult Care Finance.

The report also sought approval for the insourcing of the following services in the Council, with effect from 1 April 2019: Mosaic technical development support; Freedom of information, Complaints and Information; Governance (including Subject Access Requests) administration; Agresso (Business World On) System Administration (People Management). These services would be integrated with the corresponding services within the County Council providing an integrated, agile function.

The Chairman of the Overview and Scrutiny Management Board advised that the Board had considered the Executive report on Corporate Support Services Re-commissioning at its meeting on 27 September 2018 and agreed to support the four recommendations to the Executive. The comments of the Board were tabled at the meeting.

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The Board agreed to pass on two specific comments to the Executive:

- Fire and Rescue Payroll – There had been some reservations expressed about the performance of the existing contractor on Fire and Rescue payroll, as the previous contractor had not created a high error rate. Fire and Rescue services operated under national conditions of service, and retained firefighters were not unique to Lincolnshire; and
- Effective Partnership Working – The Board was advised that Serco's payroll error rate estimated from June data was 0.3%, which equated to about 14 individuals in that month. The Board agreed that the Council needed to become an effective partner with the contractor.

The Chairman of the Board also highlighted that many of the problems with Agresso had related to the way it had been set up, with some responsibility resting with the client side. It was advised that a member of staff within the Council had now been allocated responsibility and ownership of Agresso.

The Chairman also highlighted the importance of prompt and accurate information being provided by the County Council to Serco.

Further to the Board's comments in relation to Fire and Rescue Payroll, it was advised that the Executive Councillor for Community Safety and People Management would liaise with the Chairman of the Public Protection and Communities Scrutiny Committee to obtain further information.

The Executive reiterated the importance of the Council needing to focus on stabilising and developing its ICT and rebuilding Agresso. To pursue a procurement at the same time would present unacceptable risks of failure when existing issues had not yet been resolved.

RESOLVED

That the Executive;

- (1) Approves the entering into a contract extension with Serco for a period of two years, with effect from 1st April 2020 to 31st March 2022 to include the following services:
 - Information Management Technology
 - Payroll
 - HR Administration
 - Customer Service Centre (CSC)
 - Exchequer Services and Adult Care Finance.

- (2) Approves the insourcing of the following services into the Council, with effect from the 1st April 2019;
- Mosaic technical development support
 - Freedom of Information, Complaints and Information Governance (including Subject Access Requests) administration
 - Agresso (also known as Business World On) System Administration (People Management).
- (3) Delegates to the Chief Executive in consultation with the Leader of the Council and Executive Councillor for Community Safety and People Management authority to take all decisions relating to the future commissioning or provision of professional People Management services to the Council and to schools
- (4) Delegates to the Chief Executive authority to determine the final terms of the extension and insourcing referred to in paragraphs 1 and 2 above and approve the form and the entering into of all contractual and other documentation necessary to give effect to the said extension and insourcing in consultation with the Leader of the Council.

The meeting closed at 11.00 am.

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**Open Report on behalf of Debbie Barnes OBE, Executive Director
of Children's Services**

Report to:	Executive
Date:	06 November 2018
Subject:	Building Communities of Specialist Provision for Children and Young People with Special Educational Needs and Disabilities
Decision Reference:	I015623
Key decision?	Yes

Summary:

The purpose of this report is to present the Building Communities of Specialist Provision Strategy to the Executive for consideration and approval. The report will outline the proposed vision for Special Educational Needs and Disability (SEND) provision to be implemented over the next 5 years, subject to approval. It includes details of the prescribed alterations for the special schools and the strategies identified to address the existing challenges of sufficiency and suitability in the current system. The strategy can be viewed in Appendix A and should be considered alongside this report.

The Executive is being asked to consider the outcome of both the statutory and non-statutory public consultations in respect of both the strategy itself and the proposed changes to the LA maintained schools affected by it. The Executive should be aware that the proposed changes to the Academies cited in the strategy have already been approved by the Regional Schools Commissioner, so there are no additional decision-making processes required for the approval of the strategy beyond the one from this report.

Recommendation(s):

That the Executive:

- 1) Consider the outcome of the informal public consultation and the Council's response to it as set out in the report section 6 and Appendix B and C;
- 2) Consider the outcome of the formal representation period for the Council's maintained special schools cited in the strategy as outlined in the report, section 6;
- 3) Approve the Building Communities of Specialist Provision Strategy attached in Appendix A;
- 4) Approve the alterations to Council maintained special schools set out in the table in the section of the report headed "Maintained School Alterations" to take effect on or from the Implementation date specified in the said table.

Alternatives Considered:

That the Executive does not agree to adopt the Building Communities of Specialist Provision Strategy or the prescribed alterations to the 3 LA maintained schools that underpin it.

If the Executive Council does not approve either the strategy or the associated alterations to the 3 LA maintained schools then the existing pressure on the special school system will remain. The demand on special school places will continue to increase as the number of pupil's with a greater complexity of need are identified as requiring specialist education. School designations will remain with pupils travelling excessive distances to access a school designed to meet their needs. Lincolnshire's special schools will continue to educate pupils with SEND in buildings with a lack of space for their existing pupils. Pupils with very specific needs will continue to require an education in specialist Out of County placements.

That the Executive Council agrees the strategy but not the associated alterations to the 3 LA maintained schools.

The Building Communities of Specialist Provision Strategy can only be successfully implemented if all school alterations are approved. The model requires all schools to be able to meet All Needs and for pupils with SEND to be educated in their local communities. The Academies cited in the strategy have given their full commitment to the strategic vision and have been granted approval to make the required alterations from the Regional Schools Commissioner. If the Executive were to approve the strategy but not the related school changes, the strategy could not be implemented as there would be 3 special schools in Lincolnshire which would not be able to meet the need of all pupils with SEND in their local communities.

Reasons for Recommendation:

Approval for the Building Communities of Specialist Provision Strategy is sought to make significant improvements to SEND provision, so pupils can access an integrated school system which meets All Needs, in the right place, at the right time as close to home as possible. This shared vision will ensure that Lincolnshire has a long-term strategy for pupils with SEND, ensuring sufficient special school places, reducing travel time and enabling pupils who have previously been educated in specialist Out of County Provision, the opportunity to be educated in their own communities. It will enhance sector collaboration, encouraging mainstream and special schools to work closer together by sharing expertise and best practice, to the benefit of all pupils with SEND. It will also enable special school pupils to have their health and therapeutic needs met primarily in a school setting and offer them improved opportunities to access mainstream provision and social events.

In deciding whether approve the final strategy and schools alterations within, the Executive should give particular note to the following issues:

- 1 The fact that the alterations to academies cited in the strategy continue to be fully supported by the Academy Trusts and have all received approval from the Regional Schools Commissioner. There is therefore no impediment from the academy to the co-ordination of the necessary changes across all schools needed to give effect to the strategy.
- 2 The responses to the consultation, both statutory and non-statutory, on the strategy itself. This report provides a summary of the consultation outcome in section 6, with the full report in Appendix B.
- 3 That no representations have been made with regards to the proposed alterations to the 3 LA maintained schools within the statutory representation period.
- 4 That there is no reason as to why the strategy and the school changes within cannot be approved as all parties are united in their drive to implement this vision and all statutory process have been approved, bar this final decision.

Adopting the strategy and approving the prescribed alterations to the 3 LA maintained special schools will provide reassurance to the Regional Schools Commissioner and Academy Trusts that the LA is equally committed to the shared vision for SEND provision.

1. Background

Previous Decision-Making

The proposed Building Communities of Specialist Provision Strategy was presented to Children and Young People's Scrutiny Committee on 1st December 2017 and Executive on 5th December 2017 for approval to engage in public consultation. After extensive discussion, approval was granted to engage in public consultation on both the strategy and the proposed individual school changes cited within.

Consultation on both the strategy and the proposed school changes within was held from 9th January 2018 to 14th March 2018 and provided fair and ample opportunity for interested parties to make representations. The outcome of this informal consultation period can be viewed in Appendix B. The Council's response is in Appendix C.

Once the informal consultation period had been completed and all contributions collated, the outcome was shared with the academies cited in the strategy to inform the required decision making processes as outlined in DfE Guidance "Making significant changes to an existing academy" March 2016. In response to the outcome of their individual school consultations, all academies submitted business cases to change designation (and expand and amalgamate, where

appropriate) and these were approved by the Regional Schools Commissioner in July 2018.

In July 2018, The Executive Councillor was asked to consider the outcome of the informal consultation period and grant approval to engage in statutory consultation for the 3 LA maintained schools, in accordance with DfE Guidance "Making prescribed alterations to maintained schools" April 2016.

Approval was granted for the statutory representation period to be undertaken in respect of the following schools:

St Francis Special School, Lincoln	30 th August 2018 – 27 th September 2018
St Christopher's School, Lincoln	30 th August 2018 – 27 th September 2018
The Willoughby School, Bourne	31 st August 2018 – 28 th September 2018

The statutory representation period has now ended; there have been no representations made. Approval for the final strategy is now being sought.

The Strategy

In March 2017, the Department for Education announced the High Needs Strategic Review, instructing all LA's to review provision for pupils with SEND in order to ensure that there are sufficient good school places which meet the changing needs of pupils with SEND. The review required LA's to work in close collaboration with special schools and parent and carer groups to co-produce a strategic plan which delivers sustainable, good quality provision to meet current and future needs.

Locally, Education Leaders recognised significant challenges within the existing provision and all agreed that the status quo could not remain. Increased demand on a limited number of school places, excessively long journeys for a significant number of pupils, the potentially detrimental impact of some Out of County placements on families and the need for significant improvements to some Special school buildings have all led to sector leaders identifying the need for change.

A shared response was required to these significant challenges and collaboration of School Leaders and the Parent/Carer Forum was identified as the foundation for developing an effective solution. With a commitment to developing a sustainable, inclusive and localised special education system, Special School Leaders, Lincolnshire Parent Carer Forum (LPCF) and the LA co-produced the Building Communities of Specialist Provision Strategy and have formed a collaboration to oversee the strategy's implementation, known as the Lincolnshire SEND Alliance (LSA).

The strategy will make significant changes to the existing special education provision, creating an integrated and sustainable school system where pupils can attend their nearest special school, confident that their education and health needs can be fully met.

In order to achieve this ambition, the strategy would implement a locality-based, sector-wide approach to special education which would enable all special schools to meet the wide range of needs of pupils in their local community. As existing special schools are designed to meet specific designations of need, each school would be

required to change its designation to enable them to meet All Needs. In addition, the strategy will increase the special school estate by over 500 places to address the growing demand, through significant capital investment to support expansion, where there is an identified need. The allocated capital investment would be utilised to improve premises and facilities, enabling each school to offer places to pupils from within their local communities with All Needs. The strategy also proposes establishing special school satellite provision within mainstream schools where pupils on the special school roll could be individually supported to access the mainstream curriculum and social opportunities.

In addition to the proposed alterations to the existing special schools, the strategy proposes to submit bids to the DfE for new free schools. The priority and first bid will be situated in Lincoln City, to meet the increasing demand for special school places in this area. This increased capacity would also help to address the significant over-crowding at Lincoln St Christopher's School and allow the proposed building work to be completed on this site with minimum impact of current pupils. The LA's application for a new free special school will be submitted by 15th October 2018 and the outcome announced in early 2019. Subject to further opportunities to bid for an additional free school and subject to the criteria for free school being met; the strategy proposes to develop a new special school in North Kesteven to ensure that all localities across the county have access to sufficient special school places.

The strategy requires all special schools to make significant changes to the type of need catered and expansion where need has been identified and these are outlined in detail below.

School Changes

Academy Alterations

All Academies within the strategy have considered the outcome of their individual consultations and have confirmed their formal commitment to the changes required for their schools. Academies have had their requests for change to type of need, expansion and amalgamation approved by the Regional Schools Commissioner, following discussion at the Head Teacher Board on 21st June 2018.

The following changes to Academies have been approved:

St Lawrence School, Horncastle	
Significant Change	Change to need catered for: from MLD/SLD to All Needs. Increase in capacity from 80 to 150.
Implementation Date	Sept 2021
St Bernard's School, Louth	
Significant Change	Change to need catered for: from SLD/PMLD to All Needs. Increase in capacity from 88 to 100.
Implementation Date	Sept 2022

The Eresby School, Spilsby	
Significant Change	Change to need catered for: from SLD/PMLD to All Needs. Increase in capacity from 64 to 84.
Implementation Date	Sept 2020

The Sandon School and Ambergate Sports College, Grantham	
Significant Change	Amalgamation to one school across 2 sites. Change to need catered for: to All Needs across one school from a SLD/PMLD school and an MLD/SLD school. Increase in capacity from 152 to 229.
Implementation Date	Sept 2021

The Priory School and The Garth School, Spalding	
Significant Change	Amalgamation to one school across 2 sites. Change to need catered for: to All Needs across one school from a SLD/PMLD school and an MLD/SLD school. Increase in capacity from 128 to 177.
Implementation Date	Sept 2022

The John Fielding School, Boston	
Significant Change	Change to need catered for: from SLD/PMLD to All Needs. Relocation Increase in capacity from 56 to 140.
Implementation Date	Sept 2021

Gosberton House Academy, Gosberton	
Significant Change	Change to need catered for: from ASD/SLCN to All Needs.
Implementation Date	Sept 2023

Warren Wood and The Aegir School (Mayflower Specialist Academy) already meet All Needs across both schools so no business case has been submitted as there are no significant changes to either.

Formal approval for these significant changes has now been confirmed by the Regional Schools Commissioner and these changes can proceed, on or before the implementation dates.

Maintained School Alterations

On 27th July 2018, the Executive Councillor for Adult Care, Health and Children's Services gave approval to move to formal representation period for the 3 LA maintained schools.

In accordance with the process set out in DfE statutory guidance "Making prescribed alterations to maintained schools", Statutory Notices were published, on the first day of the representation periods in the local press, posted on the

school gates and displayed in public areas in the schools. In addition, there was the opportunity for further consultation, this was publicised on the LA website, with a number of mechanisms for contribution provided.

There have been no representations made in relation to the proposed alterations to the 3 LA maintained schools during this period.

In light of this, approval is sought for the following alterations to the LA maintained schools cited in the strategy:

St Francis School, Lincoln	
Prescribed Alterations	Change to need catered for: from PD/PMLD to All Needs. Increase in number of places from 128 to 173.
Implementation Date	Sept 2021

St Christopher's School, Lincoln	
Prescribed Alterations	Change to need catered for: from MLD/SLD/ASD to All Needs.
Implementation Date	Sept 2023

Willoughby School, Bourne	
Prescribed Alterations	Change to need catered for: from SLD/PMLD to All Needs. Increase in number of places from 80 to 148.
Implementation Date	Sept 2020

Factors to be considered by Decision Makers

The following factors must be given due consideration in accordance with DfE Guidance for decision-makers; "Statutory guidance for decision-makers deciding prescribed alteration and establishment and discontinuance proposals" April 2016.

The Consultation and Representation Period

Executive must be satisfied that the appropriate consultation and representation periods have been carried out and that all of the responses received have been given due consideration.

Although there is no longer a prescribed consultation period prior to the publication of the Statutory Notice and Complete Proposal the DfE's guidance states "*a strong expectation on schools and LAs to consult interested parties in developing their proposal prior to publication*". The LA conducted a nine week period of pre-consultation from January – March with fair and ample opportunity for interested parties to make representations. Details of this consultation period can be found in Section 6 and Appendix B and the LA's response in Appendix C.

A Statutory Notice and Complete Proposal initiating a four week Representation Period, were published in accordance with current statutory requirements.

The representation period for the 3 LA maintained schools were:

St Francis Special School, Lincoln 30th August 2018 – 27th September 2018

St Christopher's School, Lincoln 30th August 2018 – 27th September 2018

The Willoughby School, Bourne 31st August 2018 – 28th September 2018

Responses submitted during both statutory and non-statutory consultations have been made available to the Executive for consideration when taking the final decision, in Section 6 of this report and in Appendix B. There have been no representations made during the formal representation period for the 3 LA maintained schools.

Education standards and diversity of provision

Executive should consider the quality and diversity of schools in the area and be satisfied that the proposal will meet the aspirations of parents, contribute to raising local standards of provision and lead to a closing of attainment gaps. The Government's aim is to create a more diverse school system offering excellence and choice so that every child receives an excellent education whatever their background and wherever they live.

The LA believes that this proposal provides the best option to improve standards of attainment with an enhanced quality of education whilst maintaining diversity. The purpose of the capital investment programme is to ensure all special schools have the facilities and resources to meet the needs of all pupils with SEND in their local community. This strategy will create a more diverse special school system which offers excellence and inclusiveness regardless of where pupils live.

Demand

Executive must consider the evidence presented for any projected increase in pupil population (e.g. planned housing developments and increasing birth rates) and any anticipated new provision (e.g. a new free school).

SEND placement planning projections indicate the number of places required in special schools to meet future demand will increase by over 6% by 2023, based upon an adaptation of the current formulae used to predict mainstream school places. This predicted increase is supported by the average rise in commissioned places since 2015 of approximately 2% annually. Demand on special school places is increasing year on year and there is a clear need to expand the sector to adequately meet need and ensure sufficiency for future pupils.

The strategy will increase special school places across the whole estate by over 500 places to meet the need for increased demand.

Equal Opportunity

The LA must have 'due regard' to the need to eliminate discrimination, advance equality of opportunity and foster good relations and should consider whether there are any sex, race or disability discrimination issues that arise out of the proposed expansion.

There are no sex, race or disability discrimination issues arising from this proposal. Details of how the strategy will enhance the experience of children and young people with SEND can be viewed in the Equality Impact Assessment (Appendix D).

Community cohesion

The impact on the community must be considered and schools have a key part to play in providing opportunities for young people from different backgrounds to learn from and respect each other and gain an understanding of other cultures, faiths and communities. The decision-maker must take account of the community served by the school and the views of different sections of the community.

The strategic vision for SEND is to build communities of place for children and young people with SEND, around their local schools. Pupils attending their local special school will benefit from less travel and more social time with their families and in their local communities, engaging with their school friends.

The proposals for enhanced mainstream inclusion through satellite provision will enable pupils with SEND to be educated in their local mainstream school alongside their peers and experience greater social opportunities. Areas where the proposed satellite provision already exists have reported improved levels of understanding and tolerance regarding SEND amongst mainstream pupils. If approved, this strategy will have a positive impact around community cohesion, enabling children and young people with SEND to add value to their local communities.

Travel and accessibility

Executive should be satisfied that accessibility planning has been properly taken into account and that proposed changes do not adversely impact on disadvantaged groups. Proposals should not unreasonably extend journey times or increase transport costs or result in too many children being prevented from travelling sustainably due to unsuitable walking or cycling routes. The proposal should be considered on the basis of how it will support and contribute to the Council's duty to promote the use of sustainable travel and transport to school.

If this proposal goes ahead it should reduce the likelihood of local children having to travel to schools outside of their local community and therefore assist the Council to meet this duty. The County Council home-to-school transport policy will continue to apply with entitlement to transport based on need but as more pupils will be attending their local Special School, journey times will be significantly reduced.

School premises and playing fields

All schools are required to provide suitable outdoor space to both enable physical education for pupils in accordance with the curriculum and also for pupils to play outside safely. DfE guidelines suggest areas for pitches and games courts but these are non-statutory.

All building schedules within the strategy have been compiled within the requirements of Building Bulletin 104 and in discussion with Head Teachers.

Suitable outdoor space has been considered in proposed school developments for all special schools including the 3 LA maintained settings.

Special Educational Needs (SEN) Provision and SEN Improvement Test

If approved the strategy and school changes that flow from it will have a positive impact on SEND provision for pupils of both in both mainstream and special school and their families. Implementation of the strategy will lead to significantly increased capacity in special schools, reduced travel time for pupils, enhanced opportunities for mainstream inclusion and pupils who would previously been educated in Out of County provision will be able to access their education locally. The strategy document (Appendix A) sets out the benefits of the proposed integrated special schools system in detail.

Funding and Finance

The Executive should be satisfied that any land, premises or capital required to implement the proposals will be available and that all relevant parties have given their agreement. Where the expansion is reliant on the DfE for funding it cannot be assumed that approval of the proposal will trigger the release of capital funds unless previously confirmed in writing.

The DfE allocated £0.284m to Lincolnshire to conduct a High Needs review and develop its strategic plan for SEND provision. This plan has been published on the Lincolnshire Family Services Directory and will be updated annually every March. The publication of the proposed plan has secured a DfE allocation of £2.852m for capital investment to increase SEND sufficiency over the next 3 years. The DfE has identified SEND sufficiency as a Government priority and it is reassuring that capital investment is being made in this area.

Implementing the capital programme of works to ensure all special schools have the facilities and premises to meet all needs including a new school at Boston, with appropriate inflationary increases in line with a 5 year delivery plan, is projected to cost circa £50m. If capital expenditure were to exceed projected costs, the LA would ensure contingency plans are in place to address any overspend. In a project of this magnitude there is ample opportunity to address building schedules to minimise any potential overspend and to seek additional funding opportunities.

Funding Allocations

Amount	Source
£25.1m	Maintenance Grant
£3.2m	Basic Need Grant
£0.84m	Internal Capital
£2.852m	DfE SEND Capital
£2.525m	Condition Improvement Fund (CIF)
£16.12m *	Future Basic Need Grant (* indicative)
£50.637m	

Capital funding of £34.517m has been earmarked. The future basic need allocation is indicative at this stage, as allocations are only provided for the next 3 years. The amount determined is based on the LA capital return for 2021/22 and 2022/23 and final funding allocations will be subject to confirmation from central government.

The Council is firmly committed to implementing this strategy to improve the lives of pupils with SEND and their families whilst recognising there is a financial risk due to future basic need being indicative. The risk is understood, and the funding requirements have been identified through the LA capital return submission and are substantiated through the strategy to increase the special school estate by over 500 places.

Community Inclusive Trust have already contributed over £2.5m through a successful CIF bid, and all other Academy Trusts have committed to ensuring all future CIF bids are consistent with the vision outlined in the strategy. There are currently 3 CIF bids being developed in line with the wider strategy for submission in the next round of applications.

Government treasury are expected to release further SEND capital opportunities over the coming year either through direct allocations or bidding rounds, which Lincolnshire will be wishing to explore.

The LA will also be submitting an initial application to the DfE for the first and priority new free special school by 15th October 2018, as part of this strategy. Applicants will be informed by early 2019 if they have been successful and sponsors invited to tender for the free school in Spring 2019. The LA believes its application will be well-received by the DfE and the approval of this strategy will give further support to Lincolnshire's position.

Additional funding to support the implementation of the SEND vision has been identified from the Dedicated Schools Grant. These one-off brought forward monies will be utilised to develop the revenue elements of the strategy including implementation of the workforce development framework, and supporting schools with planned growth in places.

2. Legal Issues:

Equality Act 2010

Under section 149 of the Equality Act 2010, the Council must, in the exercise of its functions, have due regard to the need to:

- * Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act
- * Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
- * Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The relevant protected characteristics are age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; and sexual orientation

Having due regard to the need to advance equality of opportunity involves having due regard, in particular, to the need to:

- * Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic

* Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it

* Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low

The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities

Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to tackle prejudice, and promote understanding

Compliance with the duties in section 149 may involve treating some persons more favourably than others

The duty cannot be delegated and must be discharged by the decision-maker. To discharge the statutory duty the decision-maker must analyse all the relevant material with the specific statutory obligations in mind. If a risk of adverse impact is identified consideration must be given to measures to avoid that impact as part of the decision making process

The primary equality consideration for the strategy is the protected characteristic of people with disabilities, as it proposes to significantly alter the educational experience of pupils with SEND. In producing the strategy, the needs of pupils with SEND and their families have been central to its development with the primary aim of reducing the negative impact of excessive travel time to school which their mainstream peers do not experience. In order to ensure pupils with SEND and their families opinions are considered throughout the strategy, Lincolnshire Parent Carer Forum have been involved in its coproduction and were actively involved through the consultation period. The LPCF have also represented the views of parent/carers of children and young people with SEND as a member of the Lincolnshire SEND Alliance and at all work streams focused on the implementation of this strategy.

The strategy proposes to reshape the special school system to remove designations from the entry criteria, enabling pupils to attend their local school which will meet all type of need and disability. By investing in school infrastructure they have the ability to better meet all need, pupils will be able to attend school locally, meaning they no longer have to travel significantly long journeys and reduce the negative effects of daily long-distance travel.

By removing the barriers of designation from special schools, the strategy will also seek to reduce separation in schools and offer pupils with SEND more opportunity for integration and inclusion.

The proposed mechanisms within the strategy which will address the need for greater collaboration between mainstream and special school i.e. special school satellites, will offer greater inclusion and enable pupils with SEND to access more mainstream opportunities. These may include access to the mainstream curriculum, social activities and extended day; affording pupils with SEND the equal opportunities and experiences of their mainstream peers. This strategy also

encourages pupils with SEND to foster good relationships with their mainstream peers by providing greater opportunity to associate.

Age and disability has been considered as protected characteristics with regards to pupils with SEND and their experience of transition. By removing the need to transition between schools at key points in their education, the strategy recognises that pupils with SEND have different needs than their mainstream peers when it comes to transition.

All other protected characteristics relate specifically to the educational provision pupils receive within the school setting, which is not going to change as a result of the strategy.

The Equality Impact Assessment for this strategy can be viewed in Appendix D.

Joint Strategic Needs Analysis (JSNA) and the Joint Health and Wellbeing Strategy (JHWS)

The Council must have regard to the Joint Strategic Needs Assessment (JSNA) and the Joint Health & Well Being Strategy (JHWS) in coming to a decision

Lincolnshire's Joint Strategic Needs Assessment for children and young people aged 0 – 25 with SEND, illustrates a growing trend in number and complexity of need both nationally and locally.

As of 2017, there were 105,806 pupils on roll in Lincolnshire's maintained and academy schools; of these 15.9% were in receipt of some form of provision for their Special Educational Needs. This is higher than the England average of 14.4%.

In Lincolnshire in January 2018 the position was:

- 4,560 children and young people (0-25) with a Statement or EHC Plan. This is a 16% increase from January 2017 and a 38% increase overall since the implementation of the SEND reforms in September 2014 when there were 3,300 Statements of SEN.
- 1,751 young people were placed in a maintained or academy special school. This is a 3.4% increase from January.
- 86 young people were in Non-maintained Independent special schools. Of these, 50 were in residential settings with 17 young people in a 52 week placement.
- 42 children and young people were in Independent mainstream schools.
- 660 young people were in general Further Education or Sixth Form college; an increase of 21.5% from 2017.
- 154 young people were in Specialist Post 16 settings; of these 53 were in Independent Specialist provision with 2 young people in 52 week residential placements.
- 30 young people were undertaking Traineeships, Supported Internships or Apprenticeships which is one less than there was in January 2016.
- 18 young people were Electively Home Educated.

Lincolnshire's largest cohort of pupils with an EHC Plan is those aged 11 to 16 (52.4% of all plans). In Lincolnshire there is generally an incremental rise in the numbers of pupils with an EHC Plan in each age group from 3 to 16 and then numbers drop with a sharp decline from age 20 to 24. (Source: School Census January 2017)

SEND remains more prevalent in boys than girls. 14.6% of boys in England are on SEN Support compared to 8.1% of girls. In Lincolnshire 16.3% of boys are on SEN Support compared to 9.7% of girls. In England 4.0% of boys have a statement or EHC Plan compared to 1.6% girls. In Lincolnshire this figure is 4.2% for boys and 1.6% for girls. (Source: School Census January 2017)

The significant pressures in SEND provision, evident nationally and in the JSNA, provide the drivers for this strategic change.

The Joint Health and Wellbeing Strategy prioritises the needs of children and young people with SEND through the objective:

- Ensure appropriate support services are in place for pupils with a special educational need and/or a disability.

Two primary aspirations for the Building Communities of Specialist Provision address this objective:

- Provide a local education system in which parents can have confidence that their child's education, health and care needs can be met.
- Clarify and enhance health interventions across Special schools, so all schools can meet the health and therapeutic needs of the pupils in their communities.

Crime and Disorder

Under section 17 of the Crime and Disorder Act 1998, the Council must exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent crime and disorder in its area (including anti-social and other behaviour adversely affecting the local environment), the misuse of drugs, alcohol and other substances in its area and re-offending in its area

The decision required in response to this report does not impact crime and disorder.

3. Conclusion

The recommendation of this paper is for Executive to formally adopt the Building Communities of Specialist Provision Strategy and approve the proposed changes to the 3 LA maintained schools which flow from it. The LA has complied with its statutory duties with regard to consultation on both the strategy and proposed school changes in accordance with DfE Guidance "Making prescribed alterations to

maintained schools". Statutory representation for St Francis Special School, St Christopher's Special School and The Willoughby School has been undertaken and there have been no representations made.

The non-statutory consultation outcomes have been considered by the decision-makers for the academies within the strategy and all their significant changes have been approved by the Regional Schools Commissioner.

Executive is now invited to consider the responses to the public consultations, the response to the formal representations period and the decision-making guidance and determine whether to approve the Strategy and alterations to LA maintained schools that flow from it.

4. Legal Comments:

The Council has the power to approve the Strategy and the alterations to Council maintained schools referred to in the report.

The Executive must conscientiously consider the outcome of both the public consultation and the statutory representations process in reaching a decision on both the Strategy and the school alterations.

The Executive must have regard to the decision-making guidance and the analysis as described in the report in reaching a decision on the school alterations.

The decision is consistent with the Policy Framework and within the remit of the Executive.

5. Resource Comments:

The recommendation in the report to adopt the Building Communities of Specialist Provision Strategy and approve the LA maintained school alterations that underpin it will be supported through revenue and capital funding.

Revenue funding of £2m has been earmarked to support the implementation of this strategy from the Dedicated Schools Grant underspend following Schools Forum support – this is to support training, start-up costs, transitional support etc. The High Need block of the Dedicated Schools Grant will be required to support the place funding to schools.

Capital funding has been earmarked for the project from within the Council's capital grants and academies have also accessed capital grant funding for improvements. In addition to this, future years anticipated government grants funding have been factored in to fulfil the programme of works, which is based on a LA return for basic need requirements for 2021/22 and 2022/23. The project covers a 5 year period, therefore anticipated government grant funding will be subject to the government's next spending review, however strong indications to

date show that the government is committed to this agenda following the release of new government funding to LAs for special schools sufficiency (including a further £50m nationally on top of the £215m previously announced).

Although a financial risk exists due to the future grant funding subject to the next spending review, the LA sees this risk as manageable, and is committed to continuing to work with its schools to secure additional grant funding for the strategy when opportunities arise.

The strategy is seen to be offering value for money for Lincolnshire through pupils with SEND having sufficient special school places locally to meet needs and the financial efficiencies that come with this.

6. Consultation

The proposed strategy and school changes that flow from it have been subject to the required statutory and non-statutory consultations as set out in the following DfE Guidance:

- Making "prescribed alterations" to maintained schools, April 2016.
- Making significant changes to an existing academy, March 2016.

Non-Statutory Consultation

For a detailed account of the informal consultation process and outcome, see Appendix B.

This stage of consultation served three separate purposes:

- A consultation on the Building Communities of Specialist Provision Strategy itself;
- A consultation by the Council on the proposed changes to maintained schools which represented the initial consultation stage of the process for making changes to maintained schools set out in Guidance; and
- A consultation on behalf of the Academy Trusts responsible for the Academies cited in the strategy in relation to changes in the organisation of those Academy schools.

In summary, informal consultation indicated support for the proposed strategy through survey responses and most individual school consultations.

Where representations were made which did not support the strategy or the school changes proposed within the strategy, these have been addressed by both the LA and individual school and details of the objections can be found in the full outcome report (Appendix B).

Comments and questions presented through the consultation process have been considered and the council's response can be viewed in Appendix C.

Statutory Representation Period

The statutory representation period for the 3 LA maintained schools was conducted in accordance with DfE statutory guidance: making prescribed alterations to maintained schools. The representation period commenced on 30th/31st August 2018, for exactly 4 weeks, completing on 27th/28th September 2018.

No representations have been received relating to the proposed alterations for the 3 LA maintained schools.

Consultation Outcome

Overall the responses from the informal consultation were in favour of the strategy and the school changes which flow from it although there were strongly expressed opposition to proposed changes at one of the Academy schools and some concern expressed at St Francis School (one of the LA maintained schools). The Executive is referred to Appendices A and B for the full outcomes and analysis of the consultation responses which they must take into account in reaching a decision. As long as the Executive gives conscientious consideration to the outcome of the consultation there has been nothing in the public consultation process that would prevent the Executive from approving the strategy and the associated school changes.

There have been no responses from the statutory representation period for any of the 3 LA maintained schools. It is unlikely that this is due to a lack of awareness from parent/carers as ample opportunities to make representations were provided and the Statutory Notices well publicised. It is more likely that the informal consultation process was so extensive and wide-reaching that those associated with the 3 LA maintained schools had already made their representations and are satisfied with the strategic direction presented.

The final consultation outcome report (Appendix B) has been shared with the Lincolnshire SEND Alliance and provided all Academy Trust with sufficient evidence to confirm their commitment to the strategy. In response to the consultation outcome, all academies submitted their business cases to the Regional Schools Commissioner and were subsequently approved.

No part of the public engagement process, statutory or non-statutory, has provided sufficient evidence that the Executive Council cannot approve the strategy and school changes that flow from it.

a) Has Local Member(s) Been Consulted?

Yes.

b) Has Executive Councillor Been Consulted?

Yes.

c) Scrutiny Comments

The Children and Young People Scrutiny Committee met on 19 October 2018 and considered a report on Building Communities of Specialist Provision for Children and Young People with Special Educational Needs and Disabilities.

The Committee unanimously supported the recommendations to the Executive and agreed to pass on the following comments as part of the consideration of this item.

- The Committee supported the level of built in sustainability and adequate capacity proposed as part of the proposals and the consideration given to future growth planning.
- The Committee welcomed the proposals on workforce development and queried whether workforce capacity would increase as part of the proposals to expand capacity. Officers confirmed that the proposals would aim for planned growth over time, with a gradual change where expansion in numbers was planned. The need to incentivise training and development within special schools as part of the talent pipeline was also endorsed as a key aim of the proposals.
- The Committee queried the level of Health engagement as part of the development of the proposals. It was confirmed that local health provision had representation as part of the project development board. Officers confirmed that engagement with Health had been positive and had identified significant areas of development for a more effective Health offer as part of the proposals.
- The Committee highlighted the proposals for enhanced mainstream inclusion to enable pupils with SEND to be educated in their local mainstream school as best practice. The Committee sought assurance that enhanced mainstream inclusion would be a key aim of the strategy. Officers confirmed that operationalising good practice was a priority and that initial work to identify possible models to achieve greater mainstream inclusion was underway. It was agreed that the Children and Young People Scrutiny Committee would receive further consideration of this area as the policy develops.
- The Committee received assurance that the level of skills and experience within the special school sector would be retained as part of the change to all need provision.
- The Committee emphasised strong support for enabling pupils to attend their local special school and the greater integration in their local communities this would bring.
- The Committee expressed thanks to the Lincolnshire Parent Carer Forum and other partners and officers for the excellent work undertaken to develop a strong groundwork, level of collaboration and commitment as part of the proposed strategy. The Committee also thanked Daran Bland, Executive Headteacher of the Priory School, the Garth School and the John Fielding School for his attendance at the meeting.

d) Have Risks and Impact Analysis been carried out?

Yes.

e) Risks and Impact Analysis

See Appendix D.

7. Appendices

These are listed below and attached at the back of the report	
Appendix A	Building Communities of Specialist Provision for Children and Young People with SEND Strategy <i>(NOTE – Owing to its size, this document is only available to view electronically via the below link or upon request:</i> http://lincolnshire.moderngov.co.uk/ieListDocuments.aspx?CId=121&MId=4973&Ver=4)
Appendix B	Public Consultation on the Building Communities of Specialist Provision: Consultation Outcome <i>(NOTE – Owing to its size, this document is only available to view electronically via the below link or upon request:</i> http://lincolnshire.moderngov.co.uk/ieListDocuments.aspx?CId=121&MId=4973&Ver=4)
Appendix C	Public Consultation Feedback with Responses <i>(NOTE – Owing to its size, this document is only available to view electronically via the below link or upon request:</i> http://lincolnshire.moderngov.co.uk/ieListDocuments.aspx?CId=121&MId=4973&Ver=4)
Appendix D:	Equality Impact Assessment <i>(NOTE – Owing to its size, this document is only available to view electronically via the below link or upon request:</i> http://lincolnshire.moderngov.co.uk/ieListDocuments.aspx?CId=121&MId=4973&Ver=4)

8. Background Papers

The following background papers within the meaning of section 100D of the Local Government Act 1972 have been used in the preparation of this report

Document title	Where the document can be viewed
DfE Guidance: "Making prescribed alterations to maintained schools" April 2016	https://www.gov.uk/government/publications/school-organisation-maintained-schools
DfE Guidance: "Making significant changes to an existing academy" March 2016	https://www.gov.uk/government/publications/making-significant-changes-to-an-existing-academy

DfE Guidance for decision-makers; "Statutory guidance for decision-makers deciding prescribed alteration and establishment and discontinuance proposals" April 2016.	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/514570/16-04-06_FINAL_SO_Guidance_DM.pdf
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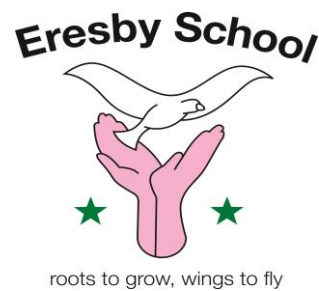
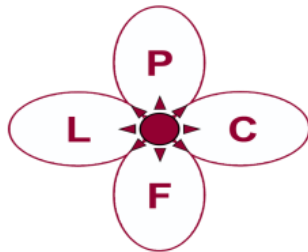
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BUILDING COMMUNITIES OF SPECIALIST PROVISION TOGETHER IN LINCOLNSHIRE

A Strategy for Children and Young People with
Special Educational Needs and Disabilities



Working in Collaboration with



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Forward by Executive Councillor

The Building Communities of Specialist Provision Strategy – delivering accessible inclusive education in your locality with minimal travel, enhanced provision and with increased number of places.

I am delighted to share our ambitions to improve the availability of local services for children and young people with special educational needs and those with a disability.

I believe that all children have the right to access education as near to their local community as possible and am fully committed to working with our schools and with parents to help realise this ambition. All Lincolnshire schools strive to offer the right level of support to children and young people, but when mainstream schools can no longer meet the complex needs of some of our children, we all want them to be able to access high quality education which helps them to achieve their potential, as near to their local community and family as possible. This strategy, supported through significant investment, will help us to achieve this.

This strategy outlines our vision for special educational needs and disabilities (SEND) provision for Lincolnshire, not only focusing on education but also placing the health and care needs of pupils at the heart of the strategy. We recognise that this will require some significant changes to existing provision, but be assured that we have worked in collaboration with all Special School Leaders and the Lincolnshire Parent Carer Forum to ensure that the changes will benefit families in Lincolnshire.

We recognise the potential impact of significant change and are fully committed to ensuring the needs of children and young people with SEND and their families are at the heart of these proposals. Whilst much of the strategy focuses on the role of special schools, it is also important to consider the role of mainstream schools in enhancing the educational opportunities of pupils with SEND in their settings and for those who may benefit from access to a more challenging curriculum but require the support of a specialist setting. All our schools in Lincolnshire are committed to doing their best to support pupils who have enhanced learning needs.

I am pleased to confirm that the Council have committed significant investment which will enable the changes required to implement the proposed model can be made. It is important that families have confidence that our special schools will be equipped to meet the wide ranging and complex needs of some of our children. They are Lincolnshire children and they deserve the right education, in the right place with the right facilities and the right staff to help them to realise their potential.

Cllr Mrs Patricia Bradwell OBE
Executive Councillor for Children's Services



Strategic Vision of Special Educational Needs and Disabilities Provision

Strategic Context

This strategy sets out the collaboratively produced vision and principles for children and young people with Special Educational Needs and / or Disabilities (SEND) educated in Lincolnshire special schools.

It has been produced in accordance with Lincolnshire's core value of:

Putting Children First
Working Together with Families to Enhance Children's Present and Future Lives.
(Lincolnshire County Council Children and Young Peoples Strategy 2017-2020)

It sits firmly within Lincolnshire County Council's (LCC) Children and Young Peoples Strategy 2017-2020, Learn and Achieve Outcome:

To improve the outcomes of our most vulnerable children by remodelling the Special Schools provision to better meet the needs of pupils with SEND.
(LCC Commissioning Strategy 2017-2020, Children's Services Learn and Achieve: Outcome 3, Objective 7)

And also within the priorities of the Joint Health and Wellbeing Strategy for Lincolnshire:

Ensure appropriate support services are in place for pupils with a special educational need and/or a disability.
(LCC Joint Health and Wellbeing Strategy 2018, pg9)

Strategic Vision

This strategy will enable Lincolnshire pupils with SEND to access an integrated All Needs education system which provides excellent education, health and care interventions in their local community.

It will:

"Establish an integrated school system where children and young people get the right health, care and education, in the right place, at the right time, as close to home as possible."

Once implemented, this new special schools system will provide the foundations for:

"Provision without boundaries: where children feel they belong, are respected, hopeful and optimistic about their future."

Our aim is to create an integrated education, health and care provision which will:

- a. Provide a localised education system in which parents can have confidence that their child's education, health and care needs can be met.

- b. Ensure a sufficient supply of special school places for pupils with SEND.
- c. Ensure local special schools can meet the needs of all pupils in their local community by removing the current barriers to access, where schools can only meet the needs of pupils with specific designations of need or disability.
- d. Reduce the travel time for pupils with SEND by enabling them to attend a special school as close to home as possible.
- e. Develop a flexible education system with greater collaboration between mainstream and special schools, so pupils can access the mainstream curriculum and other opportunities.
- f. Establish a locality-based provision, where school leaders have shared responsibility for all pupils with SEND in their locality, and stakeholders work together to ensure children and young people's needs are prioritised and met.
- g. Provide opportunities for pupils with SEND to transition to a mainstream setting, where this is identified as an achievable in the pupil's EHC Plan, through supported interventions and Satellite provision.
- h. Address the difficult situation faced by many families, where pupils are educated in Out of County (OOC) / Independent Non-Maintained Special Schools (INMS) as local special schools cannot meet their needs or do not have capacity.
- i. Clarify and enhance the existing health offer to special schools, ensuring the health and therapeutic needs of pupils are met in the right place at the right time for families and children and young people with SEND.
- j. Provide opportunities for mainstream and special school staff to enhance their knowledge of SEND, ensuring pupils are educated and supported by people who are the best that they can be. Provide opportunities for teaching and non-teaching staff to share best practice and engaged in continued professional development for the benefit of all pupils.

The Lincolnshire SEND Alliance (LSA) consists of education leaders from Lincolnshire special schools, Lincolnshire Parent Carer Forum (LPCF) and Local Authority (LA) Officers. Together they have produced this strategy, which will ensure pupils with SEND will be part of an education system which supports them to achieve their full potential as close to home as possible.

"Enhancing the education, care and support of children and young people with additional needs is at the heart of this project. Enabling all pupils to attend their nearest Special School will maintain high quality educational provision and provide opportunities for the creation of a localised special needs community."
 (James Husbands, Head Teacher at Willoughby Special School, Bourne)

Working together, we will:

- Ensure that pupils and families are at the heart of all SEND provision.
- Enhance our special schools so they can meet All Needs, enabling pupils to be educated in a school as close to home as possible.
- Enhance Lincolnshire special schools so they can provide equity of provision to all pupils regardless of where they live, with fair access to resources and support.
- Through investment, ensure sufficiency of places in special school settings for all pupils who require this provision, as identified in their Education Health Care Plan (EHCP), to attend a special school as close as possible to home.
- Create local All Needs special schools which will be able to meet the needs of pupils, who have previously been unable to be educated within the county, specifically pupils displaying difficult to manage behaviour related to their need or diagnosis.
- Work collaboratively with health and social care partners to meet the health and care needs of all pupils with SEND in local All Needs schools.
- Establish greater collaboration between special and mainstream schools to improve the educational experience of pupils with SEND in mainstream and support pupil transition within a fluid and flexible education system.

Context

National Context

Since 2010, there has been a gradual increase in the number of pupils attending state-funded special schools. In 2010, 38.2% of pupils with statements were educated in special schools: by 2018 this had increased to 44.2% of pupils with statements or EHC plans. The percentage of pupils with statements or EHC Plans attending Independent and Non-Maintained Special Schools has also increased between 2010 and 2016, from 6.2% to 7.7%. (Special educational needs: an analysis and summary of data sources DfE Jan 2018)

Nationally, the numbers of pupils who are identified as having SEND are continuing to increase and needs are becoming more complex. Across all schools, the number of pupils with SEND has risen for the second consecutive year, from 14.4% in January 2017 to 14.6% in January 2018. Autistic Spectrum Disorder (ASD) remains the most common primary type of need for pupils with a statement or EHC Plan. 28.2% of pupils with a statement or EHC Plan had this primary type of need in January 2018. This has increased from 26.9% in January 2017. (DfE, Jan 2018)

Pupils are being identified as having increasingly complex physical, health, social, emotional and educational needs which require a coordinated approach of support and care, involving a wider range of expertise and services. Access to specialist support and the location of these services are likely to be under pressure as needs and demands increase. It is therefore timely and essential to review the existing provision for pupils with SEND, to better meet current needs and create a sustainable long-term system.

In 2016, NHS England produced "Reducing Distant SEND Placements Report" which considered the sustainability of Out of County or long distance placements for children and young people with SEND. It identified the need for a more strategic approach to developing system-wide change, which must be affected through collaboration and a common moral purpose. This report supported the need to review existing special schools provision due to increasing demand on provision.

"The key to success however lies in the strategic leadership of the school system as solutions are more likely to emerge through a coherent approach when all partners are working to a common vision."

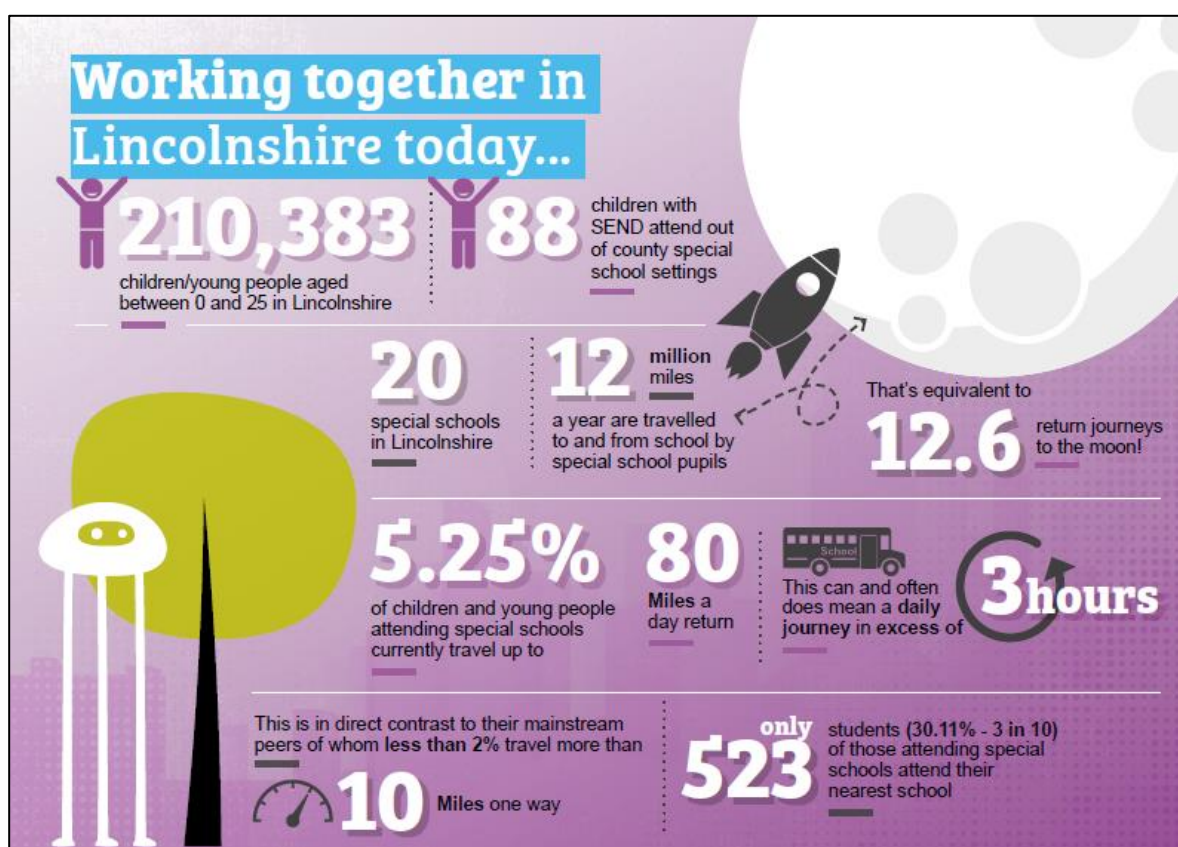
(Chilvers, P. Reducing Distant SEND Placements: Increasing Regional Sufficiency, 2016)

In March 2017, the Department for Education announced the High Needs Strategic Review, which required local authorities, alongside schools, to review provision for pupils with SEND in order to ensure that there are sufficient good school places which meet the changing needs of all young people.

"Supporting local authorities to create sufficient good school places for all pupils, including those with special educational needs and disabilities (SEND), is a high priority for the Government. Local authorities have important specific responsibilities for children and young people with SEND."

The emphasis of this strategy is close collaboration between the Local Authority, schools and providers in producing a strategic plan which delivers sustainable, good quality provision to meet current and future needs, and reflects what parents and pupils want. The Local Authority will work with maintained schools, academies, free schools and others to agree how SEND education should be met across their area, including considering the best ways of supporting mainstream schools to meet these needs.

Local Context



Lincolnshire has 20 Special Schools for pupils with SEND, primarily academies with seven Local Authority maintained schools. There are four Social, Emotional and Mental Health (SEMH) special schools; one primary and three secondary and two Local Authority maintained hospital schools. All special schools involved in the strategy are delivering Good or Outstanding education as judged by Ofsted.

In Lincolnshire in January 2018, there were:

- 4,560 children and young people (0-25) with a Statement or EHC Plan. This is a 16% increase from January 2017 and a 38% increase overall since the implementation of the SEND reforms in September 2014 when there were 3,300 Statements of SEN.
- 1,751 young people were placed in a maintained or academy special school. This is a 3.4% increase from January 2017.

- 86 young people were in Non-maintained Independent special schools. Of these, 50 were in residential settings with 17 young people in a 52 week placement.
- 42 children and young people with EHC Plans were in Independent mainstream schools. (Source: School Census Jan 2018)

Research commissioned by Lincolnshire County Council (LCC) conducted by the ISOS Partnership (2015/16), identified the need to "reshape" SEND provision to meet the needs of the increasing population of pupils requiring a special school place. It also highlighted the need for more collaborative working between special and mainstream schools and lends its support for an "All Needs" approach to SEND. (ISOS Partnership, 2015)

Further research by ISOS examined parental views of SEND services, in particular the experience of parents of pupils educated in Out of County/Independent Non-maintained schools. Responses were varied but parents generally viewed Out of County placement as a last resort and as a result of continuous system failings for their child or young person.

This combination of this research along with national policy development from the Department for Education (DfE) has identified the need to review existing provision and develop a new strategy to reshape the special schools system for Lincolnshire.

Since the introduction of the SEND Code of Practice in 2014, and following national trends, Lincolnshire has seen a significant increase in the number of pupils identified with SEND and complexity of need, and therefore an increase in the number of pupils seeking a place at a special school. This increase in demand for places has led to significant capacity pressures along with challenges where schools retain a specialist designation meaning long journey times for a significant number of pupils. Special School Leaders have identified that the existing provision is experiencing considerable pressures and questions around suitability and sustainability have been raised. These pressures, which will be presented within the strategy, are making the current system unsustainable and the status quo cannot remain.

Parent/Carer Perspective

The Lincolnshire SEND Alliance recognises the challenges faced by pupils with SEND and their families in accessing the right education, health and care provision and believes this strategy places them firmly at the heart of our vision for special education.

In accordance with the SEND Code of Practice 2015, the Lincolnshire Parent Carer Forum has been working closely with the LA and Special Schools Leaders to ensure that any strategic planning and future provision meets the needs of local children and young people and their families.

"At a strategic level, partners must engage children and young people with SEN and disabilities and children's parents in commissioning decisions, to give useful insights into how to improve services and outcomes..... To do this, local authorities and CCGs should engage with local Healthwatch organisations, patient representative groups, Parent Carer Forums, groups representing young people with SEN and disabilities and other local voluntary organisations and community groups."

(SEND Code of Practice, 2015, Section 3:18, page 42)

The DfE High Needs Strategic Review also emphasises the importance of parent/carer involvement in the planning of future SEND provision and encourages all local authorities to include Parent Carer Forums in its strategic planning activities.

Parents and Carers have been represented in the production of this strategy by the Lincolnshire Parent Carer Forum, who highlighted the inequalities and challenges faced by families in the current system. Representing the views of over 2000 members, LPCF ensured that:

"Parents and their children were at the heart of the strategy and that we (LPCF) could ensure our expertise in listening to and representing parents' views could be utilised to inform the development of the strategies proposed."

(LPCF, Parent Carer's Feedback, page 2)

In addition to LPCF's involvement in the production of the strategy, an extensive consultation process also provided parents and carers with the opportunity to contribute to the development of the strategic vision for SEND in Lincolnshire. Their contributions have been considered in detail and provided a valuable insight into the lives of families with SEND.

Parents have also raised concerns, via the ISOS Partnership research, about the impact of Out of County placements and how this negatively affects their family life.

"We lost our child at the age of 11; we lost a massive part of his teenage years. We would have preferred him to go to a school in-county; had there been a school with the right provision.....it has been very sad for us as a family."

(ISOS Partnership. SEND Review: Gathering feedback from parents and carers, 2015)

Out of County placement can cause considerable strain on pupils and their families as getting to and from school every day involves travelling a significant distance from their home and community. Some pupils may have to live away from home, in order to access a school place which provides for their specific needs. Pupils with SEND can experience exclusion from all parts of society and school is a place where they should experience friendship, belonging and community. Attending a school which is a significant distance from home often limits the number of social opportunities pupils can access, as their friends are geographically dispersed too.

Arranging social opportunities for pupils with SEND is often impossible for parents as the special schools they attend do not have an established community around it. Access to extended day opportunities are also limited due to transport arrangements and parents report that their children miss out on opportunities which would support their social development. This can have a detrimental effect on how pupils enter the world of work or further education, and how prepared they are for adulthood.

CASE STUDY 1

Eve's Story

Eve attended play school and mainstream primary in her local community. From the penultimate year at primary school I drove her 40 miles to a special school for children with complex physical disabilities on a joint placement for one day a week. This worked very well for a year in identifying whether she would be best placed in special school or would attend the mainstream secondary school the next year. The down side was the transport. I drove her the 40 miles (taking 90 minutes due to traffic etc.) due to her not being confident with taxis etc. and found that even with me driving her directly there, she was very tired by the journey (as was I!).

After another year in joint placement, whilst attending mainstream secondary school, it became clear that Eve was getting lazy and looked at her day at special school as a holiday rather than pushing herself. We subsequently went into mainstream school full time.

This worked brilliantly and she gained lots of friends in her local community (sadly she wasn't able to go to the same mainstream school as her twin – due to accessibility issues) but made lots of connections in the community attending youth club, guides etc.

Eve is now on a supported internship and has a placement at the Local Nursing Home as Activities Coordinator.

This, I strongly believe, is due to the strong links we have made whilst being schooled in our local community where everyone knows her and values her contribution to society.

In my ideal world:

- There would be NO Criteria. The child has needs and they should be met by whomever, however and whenever, but the child's needs should always be met.
- We would not have to fight for services. Service providers would have enough funding to cover these services or explore alternative options.
- Parents would attend one meeting held at school with all professionals involved in my child's case. I would only have to repeat information once and service providers would be able to provide answers to my questions.
- My child would have been able to go to the same mainstream school as her sister because the environment is not a problem.
- Systems such as statementing, EHC, PIP etc. would be simple and easy to understand. There would be no red tape or bureaucracy.
- I am always treated as an equal, listened to, respected and acknowledged as an expert on my child. This would not stop at 18 when they become an adult. We would receive support in dealing with the young person's transition to adulthood.
- There would be plenty of provision in my community for my child with a disability to play sport alongside her non-disabled sibling and friends, without my intervention.

- Service providers would be able to prioritise teaching a young person independent living skills rather than have to concentrate on GCSE's, setting my child up to fail.

My daughter may have a disability but she does not see herself as having a disability and is mainly disabled by the environment and other people. I would love for other people to see her as she sees herself.

CASE STUDY 2

Trevor's Story

Trevor travelled to School A, 28 miles from home, from age 10 until he left at 16. It was difficult to find the right provision for him and we decided on School A because at the time it 'just felt right' and had a good record, etc. We felt that our local special school (School B) was not right educationally although as time went on, and reviewing our situation in particular due to the travel, we did try to get Trevor into School B but there were no places. Nor at the time did we feel the other locality school (School C & School D) were right.

The travel was OK at first; from home to School A via another village only just off route. However, after a couple of years the route was changed so Trevor went via a town 12 miles in the opposite direction collecting students before going onto School A. He was collected from home at 7.15 am each morning and this put a big strain on us having to get him out of bed to make sure he was ready in time when he would still be exhausted from school and the travel the previous day. This also impacted on his ability to learn when at school as he would be so tired. It also impacted on his behaviour which, at times, was intolerable and certainly affected his brother and all of us as a family. In addition, the taxi company was and still is changed constantly, sometimes during the school year. I cannot see how this benefits anyone. Trevor would just get used to one driver and escort and then it would change. I did write a letter of complaint to the transport department at Lincoln but they told me that any travel less than 3/4 hour was acceptable (I am sure though that the journey was more than this on many days). As I mentioned, we did try to move him to School B later but there were no places so we decided just to 'stick it out.'

Trevor does have 'autistic tendencies' and got and still gets very tired, therefore trying to get him out of bed and rushing him to get ready most days was stressful for him and the rest of the family. I had a responsible, 'full on' job and would arrive at work most days feeling exhausted before I even started!

I think that the whole situation put a huge strain on all of us. His brother has been, over the years, a very tolerant brother and it is difficult to quantify exactly how this situation affected him as it was and still is just second nature to us all. In general, for him, the fact he has a brother like Trevor has caused him not only to miss out on things but a 'sadness' that his older brother is different compared to his friend's brothers.

In my Ideal World:

Trevor would be an independent, fit 19 year old sportsman who could drive, probably have a girlfriend and be at college. I know some people with disabled children say they wouldn't swap them but I cannot understand that because Trevor would love to be all the above things.

However, in this world Trevor would have received more help and guidance regarding choice of school. He went to School A but struggled because of his limited ability and, although we questioned this often, it was difficult to move him

once he was established in the school. Unfortunately, we were never happy that he was at the right school but it was difficult to understand alternatives.

Transport of course was an issue; length of journey but also the change of taxi providers on continual basis. Trevor would just build relationship with one escort and driver and then it would change. We would have been more than happy to contribute financially to ensure consistency.

Current Provision and Challenges

Pupils with SEND

In the academic year 2016/17 the SEND Service received 695 requests for assessments. This was a 15% increase on 2016 and an overall increase of 46% from 2013/14, the year before the implementation of the SEND reforms. There were 478 new EHC Plans issued with a further 20 still being assessed at the start of 2018.

There are increasing numbers of Education, Health and Care Requests, Assessments and Plans being allocated: as of Jan 2018, 4,560 children and young people (0-25) are subject to an EHC Plan (or Statement). This is a 16% increase from January 2017 and a 38% increase overall since the implementation of the SEND reforms in September 2014 when there were 3,300 Statements of SEN. At 2.8% of the pupil population this is in line with the regional average but Lincolnshire actual numbers are significantly higher than the neighbouring Local Authorities.

Increasing numbers of parents are requesting special school placements for their children, reporting that mainstream schools cannot meet their specific needs. Of the 4,560 pupils with an EHCP or Statement in Lincolnshire, 38.3% pupils attend special schools, 2.8% attend either Out of County Specialist Provision or Independent Non-Maintained special schools with 41% attending mainstream, above the national average of 43.8% in special schools. This move towards increased number of pupils requesting and being educated in special schools has been challenged by the DfE High Needs Strategic Review who are encouraging local authorities to consider how best to meet the needs of pupils with SEND in mainstream schools.

(All data from Lincolnshire School Census, January 2017 and 2018)

Designation

Of the 4560 Lincolnshire pupils with SEND who have EHCP/Statements 1,751 pupils are educated in Lincolnshire special schools.

These pupils are, at present, most likely to be educated in a school which has clearly defined designations i.e. Moderate and Severe Learning Difficulties combined or Physical Disabilities and Profound and Multiple Learning Difficulties combined.

Table 1: Lincolnshire Special Schools Designation

Designation	Schools
Physical Disability(PD)/ Profound and Multiple Learning Difficulty (PMLD)	St Francis School, Lincoln
Severe Learning Difficulty (SLD)/ Profound and Multiple Learning Difficulty (PMLD)	St Bernard's School, Louth The Sandon School, Grantham The John Fielding School, Boston The Garth School, Spalding The Willoughby School, Bourne

Moderate Learning Difficulty (MLD)/ Severe Learning Difficulty (SLD)	St Christopher's School, Lincoln St Lawrence School, Horncastle The Eresby School, Spilsby Ambergate Sports College, Grantham The Priory School, Spalding
Autism Spectrum Disorder (ASD) Specialist	Gosberton House, Gosberton
All Needs	Warren Wood, Gainsborough The Aegir School, Gainsborough

Some schools above have begun the progression into providing for a wider range of needs than their designation indicates due to sufficiency demands, whereas others have remained committed to their specialism, as can be seen from the table below.

Table 2: Actual distribution of pupil need across Special Schools

School	ASD	HI	MLD	MSI	OTH	PD	PMLD	SEMH	SLCN	SLD	SPLD	VI
Ambergate, Grantham												
Sandon, Grantham												
Gosberton House, Gosberton												
Priory, Spalding												
John Fielding, Boston												
Garth, Spalding												
St Christopher's, Lincoln												
St Francis, Lincoln												
St Lawrence, Horncastle												
Eresby, Spilsby												
St Bernard's, Louth												
Warren Wood, Gainsborough												
Aegir, Gainsborough												
Willoughby, Bourne												

(Shaded areas in the table above indicate schools which have pupils with the indicated type of primary need in attendance. For definitions, please see All Needs Definition pg. 27)

This demonstrates that Lincolnshire special schools are already meeting a wider range of need than their designation indicates, enabling children to access education in their local community, thereby reducing unacceptable travel time to school. This must be an entitlement for all our children rather than this practice happening in some areas of our county.

Capacity and Commissioned Places

Through this strategy, Lincolnshire SEND Alliance are committed to enabling pupils to attend a special school as close as possible to home and this means ensuring there is adequate capacity in each school and locality to meet demand. At present there are significant challenges regarding capacity with 50% of special schools providing places to pupils beyond what is ideal for their premises size.

The table below highlights the increase in commissioned Special School places year on year. The LA finds itself in the difficult position of regularly requesting special schools to find school places beyond capacity but this does not address long-term need nor is it sustainable. This strategy will address the continuous need for more places by expanding the special school estate in line with projected pupil numbers, of between 6% and 7% over the next 4 years, with an additional 3-4% sustainability flex. Significant investment is required to expand the special schools estate to ensure there is sufficient capacity to meet the growing need and changing profile of their population.

Table 3: LCC Commissioned Special Schools places from 2015/16 – 2018/19

School	15/16	16/17	17/18	18/19
Sandon, Grantham	77	74	75	72
Ambergate, Grantham	122	125	142	144
Gosberton House, Gosberton	90	90	90	95
Priory, Spalding	130	128	129	133
Garth, Spalding	45	50	55	59
John Fielding, Boston	44	49	52	58
St Christopher's, Lincoln	260	282	261	242
St Francis, Lincoln	133	151	146	140
St Lawrence, Horncastle	141	154	157	155
Eresby, Spilsby	57	58	69	79
St Bernard's, Louth	62	62	63	68
Willoughby, Bourne	71	69	79	80
Warren Wood, Gainsborough	60	57	85	93
Aegir, Gainsborough	127	121	117	111
Total	1419	1470	1520	1529

To ensure sustainability and adequate capacity in any future special schools system, consideration must be given to significant growth planning and sufficiency forecasting for this cohort.

SEND Placement Planning

Initial projections of the number of places required in special schools to meet future demand indicate an increase of over 6% by 2023, based upon an adaption of the current formulae used to predict mainstream school places. This predicted increase is supported by the average rise in commissioned places since 2015 of approximately 2%. Demand on special school places is increasing year on year and there is a clear need to expand the sector to adequately meet need and ensure sufficiency for future pupils. Based on placement planning projections, this strategy will implement a 10% capacity increase across the special school sector to meet growing demand. However, it is not sustainable to simply keep building more capacity without adopting a long-term strategy to meet the needs of this growing cohort in their own communities.

School Premises

In addition to the capacity pressures highlighted, some special schools are challenged with premises which are not suitable to meet the needs of their pupils. Buildings are narrow with some spaces having little or no wheelchair access. Storage for medical aids is limited with corridors being used to store standing frames and walkers.

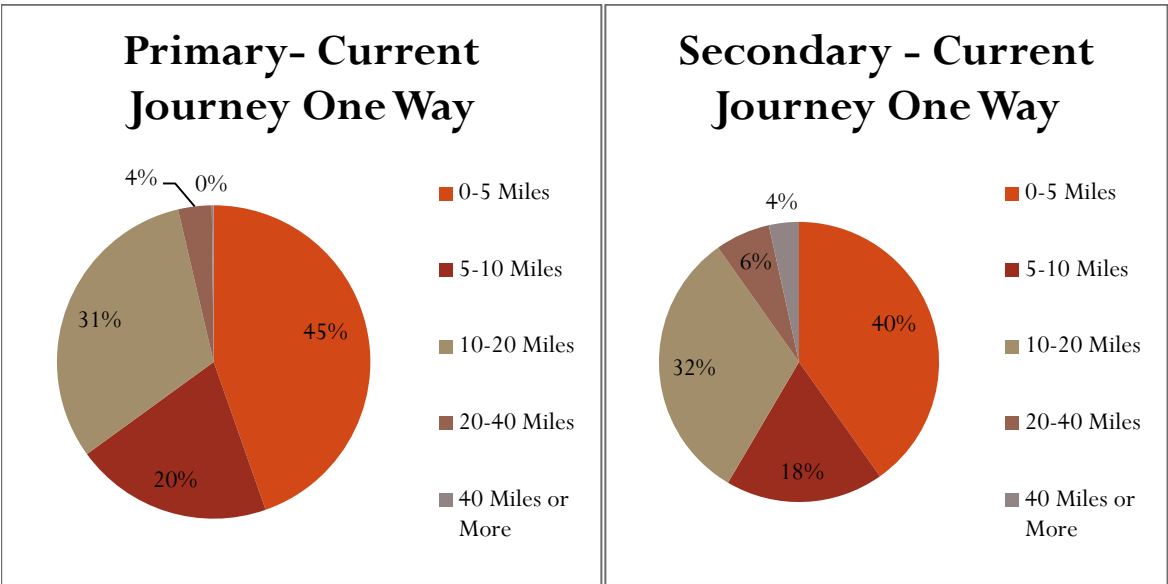
Hygiene suites are small and impractical, with scope for redevelopment limited due to site restrictions. Some special schools are, at present, unable to meet the needs of pupils with more hard to manage behaviours as they do not have adequate quiet and calming spaces. This is impacting on the need for OOC placements for this cohort of pupils as special schools cannot meet their needs.

Additionally, the majority of pupils with complex physical and medical needs are attending St Francis School in Lincoln as this has the specialist resources and health offer to meet their needs. As a consequence, pupils with the most complex needs are travelling significant distances to attend this school, rather than one close to home.

There is a significant challenge for many of the county's special schools to be able to meet the needs of pupils in their local community due to building design and space challenges. Whilst some schools were originally built to meet the needs of our most physically and medically complex pupils, other were designed for pupils with more moderate learning difficulties and therefore a programme of capital investment is required to enable schools to meet All Needs. A strategic capital investment program is essential to ensure special schools can meet the needs of pupils in their local communities, thereby reducing travel time and its impact on pupils and families.

Travel and Transport

The tables below indicate the journeys that are being undertaken by special schools pupils as of July 2017.



- 84 (5.25%) currently travel between 20 and 40 miles to school (i.e. up to 80 miles a day return).
- 493 (31.4%) currently travel between 10 and 20 miles to school (i.e. up to 40 miles a day return).
- 296 (18.9%) currently travel between 5 and 10 miles to school.

This is in direct contrast to their mainstream counterparts of whom less than 2% travel more than 10 miles one way.

The consequence of special school designation and capacity is that almost 70% pupils do not attend their nearest Special Schools, with some pupils travelling past other special schools to be educated where their specific needs can be met. The impact of considerable travel distance on pupils and families cannot be underestimated, with reduced school performance, increased levels of stress and fatigue and poor engagement possible where pupils are subject to excessive travel times. It is a basic matter of equity to seek to strive for as short and stress-free a journey to and from school as possible. It is not uncommon for pupils to have a three hour daily round trip to and from school. In the autumn, winter and early spring, such a journey, added to the school day means that pupils are often travelling in the dark at both the beginning and the end of their day.

Out of County/Independent Non-Maintained Special School Placements

Out of County placements are made only when Lincolnshire schools have stated that they cannot meet the special educational needs of a particular learner or when all schools are full. There is a continuing pressure on meeting the needs of those learners whose behaviour has proved too difficult to manage for Lincolnshire schools. All Out of County placements are subject to a rigorous commissioning process.

Young people with Autistic Spectrum Disorders and Social, Emotional and Mental Health (SEMH) needs account around 70% of Out of County placements. In almost all cases, the Out of County placement has been required due to other schools being unable to effectively manage behaviours related to their specific needs and disabilities.

The number of Out of County placements has reduced over the last three years though the costs have risen significantly. In the financial year 2016/17 the LA spent £7.997m on independent non-maintained specialist provision, an increase of £0.348m from the 2015/16 spend level of £7.649m.

Whilst for some pupils with SEND Out of County placements provide them with access to the right education for their individual needs, for many pupils and families Out of County placements are seen as the last resort and may not be the best way of achieving positive outcomes for pupils with SEND. Parents report a detrimental impact on the family unit and a belief that being educated away from home can reduce the pupil's ability to form close social networks in their local community, leaving them with without a sense of belonging in their community.

Out of County: Specialist Provision for Pupils with Hearing Impairment

In the production of this strategy, much consideration was given by LSA to specialist provision for pupils with a hearing impairment. The LSA agreed that, as most pupils with a hearing impairment receive a suitable education in Lincolnshire's mainstream or special schools, there would be no reason to change current arrangements.

For a small number of pupils who require specialist provision which Lincolnshire special schools are unable to replicate e.g. an environment in which communication is through British Sign Language specialist provision in Independent Non-Maintained special schools may still be required. Access to these settings will continue to be available through existing SEND arrangements.

Summary of Reasons for Change

- There is a clear need for a specialist school system which is sustainable and can meet current and future needs of pupils and their families, recognising that needs are becoming more complex and special schools places are at a premium.
- There are areas of insufficiency of special school places, resulting in pupils attending schools some distance away from home.
- Some special schools operate within clearly identified designations, meaning pupils may have to travel further to attend a school which can meet their need.
- Special school buildings are designed to meet the needs of pupils within their designation. Therefore, even where there is capacity and a willingness to meet pupil need, the building and resources available may restrict admission.
- Almost 70% of pupils with SEND are not attending their nearest school. For some of these pupils, this is not a significant issue. However, for over 36% of pupils their school return journey is between 40 and 80 miles per day. These calculations do not include diversions to collect other pupils so actual return journey times can be over 3 hours.
- The effects on pupil wellbeing, performance and health of attending a school that is close to home are often underestimated. However, it is clear that a longer day, caused by an arduous or long journey at each end of the school day, can have a negative impact on children and young people with SEND.
- Reduced travel time will result in increased social opportunities or family time for pupils with SEND. Opportunities for accessing local clubs or spending more time with family and friends will be greater.
- Out of County and Independent Non-Maintained specialist provision is not always the most appropriate setting for pupils with SEND. Families may be negatively impacted by placing their child in residential provision and many would rather their child was educated close to home.
- Pupils educated Out of County or in schools far away from home may be missing out on the social opportunities and experiences enjoyed by their mainstream peers and face greater challenges when returning to their local communities.
- Mainstream settings can offer many pupils with SEND the opportunity for real inclusion but require access to enhanced support from Special Schools to be able to continue meeting need throughout a child's education.
- Pupils with SEND and their families are facing too many challenges just to access the right education in the right place at the right time.

Capital Investment Programme

The DfE allocated £283,911 to Lincolnshire to conduct a High Needs review and develop its strategic plan for SEND provision. The proposed plan has been published on the Lincolnshire Family Services Directory and will be updated annually in March. The publication of the proposed plan has secured a DfE allocation of £2,842,528 for capital investment to increase SEND sufficiency over the next 3 years.

Implementing the capital programme of works to ensure all special schools have the facilities and premises to meet all needs including a new school at Boston, with appropriate inflation increase in line with a 5 year delivery plan, is projected to cost £50m.

The capital investment identified will be used to increase the capacity and suitability of the premises to meet the needs of all pupils. Many of the special schools are neither big enough nor do they have appropriate space and facilities to meet the growing complexity of their pupils. The capital funding will be utilised to expand some schools to accommodate the growing demand for special school places whilst others will see significant improvement to their current premises. For example, where a special school does not have the facilities to meet the needs of pupils with physical disabilities, this will be included in their building program, including track hoists, improved hygiene suites, medical facilities and ensuring access to a suitable hydrotherapy pool. Special School Leaders have also identified the importance of access to quiet/low arousal spaces and more sensory spaces which will be accommodated. These are just some of the areas that will be improved to ensure that all schools will be able to meet the individual needs of pupils in their local communities.

The LA firmly believes that the allocated budget, which includes already secured funds and projected Basic Need, along with future Condition Improvement Fund applications, will ensure the strategy can be fully implemented.

Additional funding to support the implementation of the SEND vision has been identified from the Dedicated Schools Grant and this will be utilised to develop the revenue elements of the strategy including implementation of a workforce development framework and to support the increased number of school places.

Stakeholder Commitment

Special Schools Leaders in Lincolnshire are united in their commitment to this strategic vision and believe in their joint responsibility for the education of pupils with SEND in their local communities. All Academy Trust have confirmed their commitment by submitting business plans to ensure they can meet all SEND needs and these have been approved by the Regional Schools Commissioner. The LA maintained special schools within the collaboration have also committed to implementing this vision for SEND provision and have undertaken formal consultation to approve the changes required. Each school has committed to an All Needs model of provision which will break down the barriers of segregation based on type of disability, where pupils can be educated within their local communities.

This strategy has received formal endorsement from the Lincolnshire Learning Partnership, who has expressed their support for the positive impact its implementation will have on Lincolnshire pupils with SEND.

At the heart of this strategy is the aspiration to enhance the lives of pupils with SEND and their families by improving their educational opportunities and environment. However, all stakeholders recognise that pupils with SEND can often be vulnerable and find change very difficult; we are committed to ensuring the needs of individual pupils are a priority and the schools changes in the model for SEND will be managed with sensitivity and consideration.

The Lincolnshire SEND Alliance can confidently reassure parents and all concerned parties that, at no point in the implementation of this strategy, will any pupil be expected to or forced to change school against their wishes. All opportunities to move to a school closer to home will be on a voluntary basis and transition will only occur as part of an agreed and fully supported process, at a time of least disruption for pupils and families.

Proposed Model

The strategy will seek to create communities of specialist education for pupils with SEND, based in 4 localities across Lincolnshire, as identified in the table below.

<p>North West</p> <p><u>Lincoln City and West Lindsay</u></p> <p>St Francis Special School St Christopher's School Warren Wood Specialist Academy The Aegir Specialist Academy Lincoln New Free School</p>	<p>North East</p> <p><u>East Lindsay</u></p> <p>St Lawrence School St Bernard's School The Eresby School</p>
<p>South West</p> <p><u>North Kesteven and South Kesteven</u></p> <p>The Sandon School Ambergate Sports College The Willoughby School Sleaford New Free School</p>	<p>South East</p> <p><u>Boston and South Holland</u></p> <p>The Priory School The Garth School The John Fielding School Gosberton House Academy</p>

This locality based model will provide the foundations for Special School Leaders to recognise and act upon their collective responsibility for pupils with SEND, ensuring all have access to a special school place as close as possible to home, when required.

This new model will support access to a special school education as close to home as possible by investing in premises and workforce development to ensure these schools can meet All Needs. As a result, pupils will no longer be required to travel considerable distances to a school that can meet all their needs, nor will pupils need to be educated away from home, unless specific need dictates.

Each locality will develop a multi-disciplinary Allocations Panel responsible for ensuring every pupil assessed as needing a special school place will be allocated one as close as possible to home.

Each locality (and the special schools within) will work collaboratively with their SEND partners to ensure that all interventions received in school not only benefit the pupils educationally but also ensure that their healthcare needs are effectively met.

Each locality (and the special schools within) will implement the workforce development plan outlined in this strategy to ensure all school staff have the appropriate knowledge and skills to meet the needs of pupils with SEND. These learning opportunities will enable pupils with SEND to remain in mainstream school if this is the right place for them to be educated. There will also be greater

opportunities for transition from special to mainstream, where identified as appropriate and beneficial for the pupil.

Every locality special school will be designated as an All Needs school and the accompanying investment outlined within this strategy will ensure schools have the appropriate premises, resources and skilled personnel to meet the needs of pupils with the following designation of disability or need.

All Needs Definition	Abbreviation
Specific Learning Difficulty	SLD
Visual Impairment	VI
Hearing Impairment	HI
Multi-Sensory Impairment	MSI
Speech, Language and Communication Needs	SLCN
Autistic Spectrum Disorder	ASD
Physical Disability	PD
Moderate Learning Difficulty	MLD
Severe Learning Difficulty	SLD
Profound and Multiple Learning Difficulty	PMLD
Social, Emotional and Mental Health Needs (as a secondary need only)	SEMH

<https://get-information-schools.service.gov.uk>

Existing segregation based on age will remain where primary and secondary schools are separate and distinct, though the majority of special schools will be providing All Through education for pupils of statutory school age (4-16 years). Where a special school provides education for pupils in Early Years and Post-16, this will remain and there are no plans to changes to school age ranges for the strategy. All Through provision negates the needs for unsettling transitions for vulnerable pupils who find change difficult.

Once implemented, the model will support over 500 additional special school places, to address the ever-increasing demand for places.

Further details of the planned changes to each school, including individual school building plans, can be found in Appendix 1: Planned School Changes Summary. Below is a summary of the model and changes to each school, by locality.

North West Locality			
School	Current Designation	Current Age Range	Prescribed Alterations
St Christopher's School, Lincoln	MLD/SLD/ASD	3-19	Designation change to All Needs Age Range - No Change
St Francis Special Schools, Lincoln	PMLD/PD	3-19	Designation change to All Needs Age Range - No Change
New Free School, Lincoln			New All Needs 4-19 Built to address increased demand and over-crowding at St Christopher's
Warren Wood,	All Needs	2-11	No change to age range or

Gainsborough			designation
The Aegir School, Gainsborough	All Needs	11-19	No change to age range or designation
North East Locality			
School	Current Designation	Current Age Range	Prescribed Alterations
St Lawrence School, Horncastle	MLD/SLD	5-16	Designation change to All Needs Age Range - No Change
St Bernard's School, Louth	SLD/PMLD	2-19	Designation change to All Needs Age Range - No Change
The Eresby School, Spilsby	MLD/SLD	2-19	Designation change to All Needs Age Range - No Change

South West Locality			
School	Current Designation	Current Age Range	Prescribed Alterations
The Sandon School, Grantham	SLD/PMLD	3-19	Merge schools into one, based across two sites. To meet All Needs across the two sites Designation change to All Needs Age Range – 3-19 across both sites
Ambergate Sports College, Grantham	MLD	5-16	
The Willoughby School, Bourne	SLD/ PMLD	2-19	Designation change to All Needs Age Range - No Change
Sleaford New Free School			New 4-19 All Needs

South East Locality			
School	Current Designation	Current Age Range	Proposed Changes
The Garth School, Spalding	SLD/PMLD	2-19	Merge schools into one, based across two sites. To meet All Needs across the two sites Designation change to All Needs Age Range – 2-19 across both sites
The Priory School, Spalding	MLD/SLD	11-16	
Gosberton House Academy, Gosberton	ASD/SCLN	2-11	Designation change to All Needs Age Range - No Change
The John Fielding School, Boston	SLD/PMLD	2-19	Designation change to All Needs Age Range - No Change Significant expansion and relocation proposed (48-140 pupils)

It is imperative that they newly proposed system can address the identified challenges to create an integrated and collaborative All Needs school system to deliver effective education and healthcare to pupils with SEND across Lincolnshire.

Sleaford

In addition to the proposed alterations to the existing special schools, the strategy proposes to submit bids to the DfE for a new free school. The priority and first bid

will be situated in Lincoln City, to meet the increasing demand for special school places in this area. This increased capacity would also help to address the significant over-crowding at Lincoln St Christopher's School and allow the proposed building work to be completed on this site with minimum impact of current pupils. The LA's application for a new free special school will be submitted by 15th October 2018 and the outcome announced in early 2019. Subject to further opportunities to bid for an additional Free School and subject to the criteria for free School being met, we will also develop a new special school in North Kesteven to ensure that all localities across the county have access to sufficient special school places.

Key Features

- Special schools that can meet all special educational needs and disabilities, enabling pupils to be educated in their local communities.
- Two new special schools to meet the demand for places. These will be free schools, and will be part of the collaborative special schools system. The priority school will be in Lincoln as this is where demand and need is greatest, followed by a special school in North Kesteven, subject to successful DfE bids.
- Four localities within the county which provide school places for SEND which are local and more easily accessible to pupils in terms of distance and travel time.
- Equal access to resources, expertise and support across the county for pupils with SEND in mainstream and special schools, which supports pupils to access or remain on roll at whichever school best meets their need (special or mainstream).
- Special school satellite provision, within each locality, on mainstream school sites (primary and secondary) which are managed by local special schools and offer mainstream academic and social opportunities for pupils with SEND on the special school roll.
- A professional development and learning network accessible to all schools which can provide shared experience, advice, knowledge, training and support on a full range of special educational needs and disabilities.
- Space and facilities to support the educational and therapeutic needs of pupils with complex physical, medical, emotional, social and educational needs in All Needs schools across Lincolnshire.
- An integrated approach with Health providers, to deliver health and therapeutic interventions to pupils with SEND in special schools.

Enhanced Joint Working

In addition to the proposed school changes highlighted, the Lincolnshire SEND Alliance has identified the need for even greater collaboration between special and mainstream schools to support pupils. Local narrative reflects national trends with more pupils with SEND seeking placement in special schools when mainstream schools can no longer meet their needs. If the demand on special school places is to be sustainable, the sector will need to work closely to ensure all pupils with SEND can access the right education, in the right place as close to home as possible. Provision must be designed to meet the individual needs of all pupils with SEND and where mainstream is identified as the most suitable setting, schools must feel confident, capable and supported to meet All Needs.

Specialist School Satellites

This strategy proposes to develop special school satellites, in order to promote collaboration and flow across the sector. Based within mainstream schools, these satellites would enable pupils on roll of the local special school to access a mainstream school environment, curriculum and social opportunities. The satellite would be part of the special school's overarching curriculum offer and provision and teaching and learning staff would be employed by the special school and work exclusively at the satellite.

The satellite would consist of provision for Key Stage 1 and 2 within primary partners and Key Stage 3 and 4 within secondary partners. Special schools would develop close links with their local mainstream provision to identify a suitable partner school and manage the subsequent relationship.

All students allocated a place in the satellite would have an EHC Plan in place or be about to transition into the special school with an impending plan. All pupils would remain on the special school roll and would regularly access the special school for shared events. Pupils would have a highly integrated and personalised timetable with opportunities for supported inclusion in mainstream lessons and social activities within the mainstream school, therefore providing flexible opportunities for social inclusion. This may include but is not exclusive to the school dining area, play spaces, assemblies, tutor programmes, community activities. The ultimate aim would be to broaden pupil's educational experience and enable them to access wider curriculum opportunities. The provision aims to develop each young person's functional literacy and numeracy skills, their personal and social independence skills, communication and organisational skills and their emotional development as adolescents. The Satellites could also support pupils who are considering a return to mainstream school by introducing elements of this setting, through a gradual and considered approach.

This approach would support workforce development, with special school staff sharing skills and knowledge with their mainstream colleague, enhancing the mainstream skill set.

The proposed model would be implemented as an initial pilot and its impact evaluated over an agreed period of time. All special schools are committed to developing satellite provision and would work with the LA to identify and create a

primary and secondary satellite class in each locality as part of the pilot. Developing base classes within the mainstream school would be essential to this provision, to ensure its sustainability and avoid changes of personnel affecting its usage. The initial pilot would accommodate one class of a maximum of 8 pupils in each satellite.

The offer of a place at the satellite provision for any student who meets the above criteria can be considered following a discussion at the student's Education and Health Care Plan meeting. This discussion would involve parents, the student and all involved professionals. Placement recommendations will then be considered by the special school Headteacher and the Local Authority and would have to be approved by all parties.

Workforce Development

A collaborative and coordinated approach to workforce development is essential if the special school sector is to provide All Needs education to pupils with SEND in their local communities. The move to All Needs education in Lincolnshire will undoubtedly present challenges for teaching and non-teaching staff as special schools accept pupils with a wider range of needs and greater complexities. LCC have committed revenue funding from the Dedicated Schools Grant to implement the strategy, including a workforce development framework which will include access to specialist training and a learning forum offering opportunities to share best practice.

Whilst recognising the level of experience and specialism which already exists in Lincolnshire special schools, the strategy will utilise sector-expertise through both the special schools and Lincolnshire Teaching School's Together (LTT) to enhance the provision for pupils with SEND. Plans are in place for the workforce development framework to be led by a partner from within the LTT and this will be developed as the strategy is implemented. In addition, Special School Leaders from both specialist schools in the county, St Francis Special School (Physical Disability/Profound and Multiple Learning Disabilities) and Gosberton House Academy (ASD Specialist) have committed to supporting workforce development across the sector in their specific areas of expertise.

The strategy also includes a drive to enhance the experience of pupils with SEND in mainstream school by improving collaborative working across the sector. A newly designed workforce development framework will be open to all staff from both mainstream and special schools, providing an opportunity to assess competency around SEND and access resources, training and further learning opportunities.

The LA believes this approach would support workforce development in mainstream schools, providing teaching and non-teaching staff with a greater knowledge and understanding of SEND. Up-skilled staff would ultimately enhance the experience of pupils with SEND in mainstream schools, enabling them to remain in their local school and be educated alongside their mainstream peers. In order to enhance collaborative working across the sector, Special School Leaders are keen to establish a support network which would enable staff to share valuable skills and knowledge to their mainstream colleagues, enhancing the mainstream skill set.

The workforce development framework will utilise the identified funding allocation to implement a plan of professional development, led by an identified Teaching School, which will offer a range of opportunities including:

- Locality based provision where staff from neighbouring schools can share knowledge and experience.
- A competency framework which enables schools to identify learning needs for all staff around SEND.
- Access to a range of suggested training options including factsheets, e-learning and training events.
- Access to a learning network, where best practice can be shared.
- In-reach support from special schools to their mainstream colleagues.
- Access to medical and therapeutic support training from specialist staff.

Cross-Cutting Considerations

Social, Emotional and Mental Health and Hospital School Provision

As part of the special schools review, significant challenges have been identified within the provision of Social, Emotional and Mental Health (SEMH) education. Questions have been raised around the suitability of the pathways to the SEMH settings which vary according to the pupil's point of identification/diagnosis. There are challenges regarding existing capacity and sufficiency, particularly in primary stage of education and if the existing model can meet the increasingly complex needs of pupils with SEMH.

Within the governance of the LSA, a work stream has been established, dedicated to developing a shared vision for SEMH provision which is consistent with the principals of this strategy. This work stream is committed to developing a future strategy for SEMH provision will ensure provision which is:

- High quality – where pupils with SEMH receive the best possible education and support.
- Evidence based – support and provision has a strong supporting rationale and makes a positive impact on outcomes.
- Collaborative across education, health and social care – to address the complex needs of pupils in a clear and coherent way.
- Tailored to the individual needs of children and young people – to enable them to make positive choices and to feel that they belong in their school and community.
- Flexible and coherent across transitions – that provide pupils with SEMH and their families with the confidence they need as they move between the various phases and stages of education and into adulthood.

The vision for SEMH provision is currently being developed and will be aligned with this strategy once approved.

Health Offer to Special Schools

Delivering a robust and effective health offer to pupils with SEND in a locality-based, All Needs school system can only be achieved through collaboration with our partners in the health and social care. This model proposed within the strategy would have a significant effect on the pupil populations of each school, moving away from specific types of need to a greater range of needs in each school. The capital investment will address the resources required to meet the need of a wider range of pupils but special schools are likely to require changes to existing health provision arrangements to ensure the needs of their pupils are met.

The LSA recognise that there will be an impact on health commissioning arrangements across the localities and will be working closely with all Health partners throughout the duration of the strategy to ensure a fully integrated system of education, health and care is developed.

"Integrated school system where children and young people get the right health, care and education, in the right place, at the right time, as close as possible to where they live."

What will have changed by 2024?

The Building Communities of Specialist Provision Strategy seeks to make significant changes to the existing special school provision, creating an integrated system where pupils attend their nearest school, confident their educational, health and care needs can be fully met. Where they have full access to a curriculum which is appropriate for their learning needs and are taught and supported by staff that are skilled in the learning profiles of all pupils with SEND. Where pupils can develop friendship bonds with their classmates which extend beyond the school boundaries, as they are educated in their local communities and where they can learn in a flexible, integrated system which supports transition.

The LSA will have successfully implemented this aspirational vision for SEND when:

Pupils with SEND:

- Can attend special school close to home which has the buildings, resources, capacity and staff skilled to meet All Needs.
- Have access to the same academic and social opportunities as their mainstream peers, in a setting which best suits their needs and preference.
- Feel they belong in their local communities and their contribution is recognised and valued.

Families of children and young people with SEND will:

- Feel assured that their local special school has the space, facilities and skilled staff to enable their child to fulfil their potential and not feel they need to consider specialist Out of County provision.
- Benefit from the development of specialist communities in their localities, where services and interventions are focused around the special school and access is easier and equitable.
- Experience enhanced family time as children travel shorter distances to school, leaving them less tired and stressed from the daily journey.

Special schools will:

- Have significantly improved premises and facilities to meet the individual needs of all pupils in their locality.
- Work in collaboration with all schools in their localities (special and mainstream) to ensure all pupils with SEND receive an integrated, high quality education which is aspirational and meets All Needs.
- Provide support to their locality mainstream colleagues, through workforce development and Satellite provision so all staff are confident they can meet the needs of pupils with SEND.

Mainstream Schools will:

- Be working in collaboration with all schools in their localities (special and mainstream) to ensure all pupils with SEND receive an integrated, high quality education which is aspirational and meets All Needs.
- Feel confident in meeting the individual needs of pupils with SEND, as they have a staff team which is skilled and supported.
- Offer, or be working towards offering special school Satellite provision in their school.

The Local Authority will:

- Have completed all building works so Lincolnshire special schools have the premises, resources and capacity to meet the needs of pupils in their localities.
- Have implemented an education system which is easier for parent/carers to access and has placed the needs of pupils with SEND and their families at the heart of all provision.
- Have fully implemented the Building Communities of Specialist Provision Strategy ensuring pupils with SEND can access:

"An integrated school system where children and young people get the right health, care and education, in the right place, at the right time, as close to home as possible."

Appendix 1 - Planned School Changes Summary

Area	Location	School	Academy/ Maintained	School Type and NOR	Current School Premises Capacity - based on class of 8 pupils	Current Designation	Proposed New Designation	Proposed New Capacity - based on classes of 8-10 depending on type of need	"Significant Change"/ "Prescribed Change"	Summary of building plans proposed	Proposed Implementation Date (pending approval of the strategy)
North West	Gainsborough	Warren Wood	Mayflower Academy	Primary	96	All Needs	No Change	No Change	N/A	No works proposed as already a new build All Needs primary special school.	Designated All Needs. No change to be implemented
		The Aegir School	Mayflower Academy	Secondary	104	All Needs	No Change	No Change	N/A	Works being considered around PD/PMLD provision.	Designated All Needs. No change to be implemented
	Lincoln	St Christopher's School	LA Maintained	All Through	200	MLD/SLD	All Through All Needs	155	Change to the type of need catered for	Demolition of a large highly unsuitable block of accommodation and replace with a new build. Improved car parking and mini bus drop off facilities.	Sept' 2023
		St Francis's Special School	LA Maintained	All Through	128	PMLD/PD	All Through All Needs	173	Expansion and change to the type of need catered for	New block of accommodation to be added to create additional capacity. Works to external play areas, access and parking improvements.	Sept' 2021
		New Free School	Academy	n/a	n/a	n/a	All Through All Needs	155	Free School Application	New school built to BB104 guidance on land owned by LCC	Sept' 2021
North East	Horncastle	St Lawrence School	The Wold's Federation	All Through	80	MLD/SLD	All Through All Needs	150	Expansion and change to the type of need catered for	Demolition of the former boarding block and replace with new teaching accommodation adding capacity. Minor remodelling to some areas of the existing school required.	Sept' 2021
	Louth	St Bernard's School	The Wold's Federation	All Through	88	SLD/PMLD	All Through All Needs	100	Expansion and change to the type of need catered for	Demolition of the former boarding block and replace with new teaching accommodation adding some capacity and replacing severely undersized accommodation. Works also required to access and parking arrangements.	Sept' 2022
	Spilsby	The Eresby School	David Ross Education Trust	All Through	64	MLD/SLD	All Through All Needs	84	Expansion and change to the type of need catered for	New block of accommodation required to create additional capacity. Minor remodelling to minimal areas of the existing school also required.	Sept' 2020

South West	Grantham	The Sandon School	Community Inclusive Trust	All Through	64	SLD/PMLD	All Through All Needs	229	Change to the type of need catered for, expansion, and amalgamation	New build required to create more suitable PD/PMLD accommodation, hydrotherapy pool and changing facilities. The Academy has been successful in a recent CIF bid enabling much of the work required to ensure Sandon can meet all needs will be addressed with this funding.	Sept' 2021
		Ambergate Sports College	Community Inclusive Trust	All Through	88	MLD/SLD				A new block of accommodation is required to create additional capacity along with internal remodelling to parts of the existing build. The Academy has been successful in a recent CIF bid enabling much of the work required to ensure Ambergate can meet all needs will be addressed with this funding.	
	Bourne	Willoughby School	LA Maintained	All Through	80	SLD/PMLD	All Through All Needs	148	Expansion and change to the type of need catered for	A new block of accommodation is required to create additional capacity along with internal remodelling to parts of the existing build.	Sept' 2020
	Sleaford	New Free School	Academy	n/a	n/a	n/a	All Through All Needs	TBC	Free School Application	New school built to BB104 guidance	TBC
South East	Boston	The John Fielding School	Community Inclusive Trust	All Through	56	SLD/PMLD	All Through All Needs	140	Expansion and new build and change to the type of need	New build school to BB104 guidance on a new site. The current school sits on a tight site which is unable to cope with any expansion and the current school buildings are also highly unsuitable and in very poor condition.	Sept' 2021
	Spalding	The Garth School	Community Inclusive Trust	All Through	40	SLD/PMLD	All Through All Needs	177	Change to the type of need catered for, expansion, and amalgamation	New build and remodelling to create more suitable accommodation and additional places. The Academy has been successful in a recent CIF bid enabling much of the work required to ensure The Garth School can meet all needs, will be addressed with this funding.	Sept' 2022
		The Priory School	Community Inclusive Trust	Secondary	88	MLD/SLD				Extensive remodelling / demolition and rebuild of the Teal House block to create additional capacity. Some internal remodelling to provide disability access to existing spaces within the main school.	
Gosberton	Gosberton House	The Lincolnshire Education Trust	Primary	64	Autism	Primary All Needs	No Change	Change to the type of need catered for	New build of PD/PMLD accommodation, potential demolition and rebuild of the existing unusable hydrotherapy pool.	Sept' 2023	

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Public Consultation on the Building Communities of Specialist Provision Strategy

Consultation Outcome

**Consultation Phase
8th January – 14th March 2018**

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1. Introduction

The Building Communities of Specialist Provision Strategy is the product of extensive collaboration between Lincolnshire County Council (LCC), Special School Leaders and the Lincolnshire Parent Carer Forum (LPCF), in response to the significant capacity, suitability and sustainability pressures which exist across Special School provision. The proposed strategy was presented to the Children and Young People's Scrutiny Committee on 1st December 2017 and to Executive Council on 5th December 2017 for approval to engage in public consultation regarding the new proposals for SEND education. Approval to commence with public consultation based on the proposed strategy was granted by Executive Council.

The purpose of the public consultation was to gather feedback for parent/carers, schools and other interested parties on the proposed strategy and model. The model had been developed by Special School Leaders with the parent/carer challenge being provided by LPCF but it was important to understand the perspectives of all parties potentially impacted by the proposed changes. The specific changes proposed for each school can be found in the Planned School Changes Summary document.

In line with DfE guidelines on consultation principals, consultation relating to significant change for schools must be clear and concise, last for a proportionate amount of time, take into account the group being consulted with and be responded too in a timely manner. LCC has given due consideration to these key principals and ensured that the consultation for the Special Schools strategy has been far-reaching, informative and has provided ample time and opportunity for interested parties to comment and contribute.

2. Consultation Opportunities

The public consultation period for this strategy commenced on Monday 8th January 2018 and ran for 9 weeks to ensure that all interested parties had the opportunity to consider the proposal and contribute accordingly. In order to ensure all interested parties were fully aware of the proposed strategy and subsequent consultation, a dedicated webpage, on the LCC website, was launched on the 8th January which included the following information:

- Outline of the strategy.
- Full strategy including proposed model maps/plan and case studies.
- Consultation letter, outlining the proposals and how to respond including links to dedicated website and mailbox for contributions and questions.
- List of all consultation events.
- Links to surveys - adult and child/young person.
- Some frequently asked questions.

The webpage was developed to ensure all information relating to the proposed strategy and subsequent consultation information could be accessed in one place. It was set out with an easy to read summary of the strategy, followed by links to both

the surveys and also a full list of all consultation events to be held over the next 9 weeks.

The consultation webpage was supported by a comprehensive communication plan which published the proposed strategy and consultation across local media and social media outlets. A media briefing was held by Cllr Bradwell, Deputy Leader of the Council and Debbie Barnes, Director of Children's Services to launch the consultation on Monday 8th January 2018 and subsequent articles and social media messages were published throughout to ensure the consultation remained high in the public's awareness.

All available internal communication routes were utilised to ensure all LCC colleagues were fully aware of the strategy. SEND staff were briefed via team meetings to ensure they had adequate knowledge of the proposals to share with pupils and their families.

The LCC Customer Services Centre was provided with a summary of the strategy and consultation information. Customer advisors were informed to signpost to the SEND Project Office should any enquiries present via this route. The consultation process was also advertised on the Local Offer and Family Services Directory with links to the dedicated website.

A consultation letter, outlining the purpose of the DfE High Needs Strategic Review and how Lincolnshire County Council proposes to address its requirements, was sent to over 1000 key interested parties including the following organisations and personnel:

- Department for Education
- Education Funding Alliance
- Local MP's
- Local MEP's
- Regional Schools Commissioner
- National Charities and third sector providers working for children and young people with SEND in Lincolnshire
- Neighbouring Local Authorities
- District Council Chief Executives
- District Councillors
- Parish Councillors
- Trade Unions
- Health Commissioners and Providers
- All Lincolnshire Special Schools (Heads and Governing Bodies)
- All Lincolnshire Mainstream Schools (via Perspective Lite)
- All Out of County and Independent Non-Maintained Special Schools where Lincolnshire pupils are currently placed
- Alternative Provision/Pupil Referral Units
- All Special Educational Needs and Disabilities Coordinators (SENDCo) registered with LCC SENDCo Network
- All Lincolnshire Independent Schools
- All Parent/Carers of pupils at Special School (including OOC and INMS)

- All Parent/Carers of pupils electively home educated with SEND

In order to ensure all parent/carers of pupils with SEND received the consultation information and details of the planned events, all Special Schools distributed a copy of the aforementioned letter to their pupils on the launch date through school communication methods. In addition, these schools published links to the LCC webpage on their school websites and encouraged parent/carers to contribute to the consultation.

Parent/Carers of children and young people with SEND, who are members of the Lincolnshire Parent Carer Forum, also received information regarding the proposed strategy and details of how to engage in the consultation via the LPCF website and email. LPCF publicised the consultation across their network extensively and regularly sent out email reminders with links to the LCC webpage, encouraging parental involvement.

Consideration was given during the planning stage of the project regarding pupils with SEND in mainstream schools and how to ensure they received the information about a proposed strategy which could affect them in the future. It was agreed that all mainstream schools would be communicated with via Perspective Lite (LCC education communication system). This briefing would include a request to share the consultation letter and dedicated website details with all parent/carers of pupils with identified SEND in their schools and also to post details of the consultation on the school website. In addition, all parent/carers of children with SEND who electively home educate were sent the consultation letter either by email or by post.

A summary of the proposed strategy and details of how to engage with the consultation were circulated to all SENDCo's registered with the LCC SENDCo Network with a request to ensure that all parent/carers of pupils with SEND received this information.

Twenty-one consultation events were planned during the consultation period to ensure adequate opportunity for interested parties to openly discuss the proposals and contribute. These events were a combination of 16 school led events, 5 Lincolnshire Parent Carer Forum events and 3 Lincolnshire County Council public events.

3. Consultation Events

For LA maintained Special Schools, in accordance with DfE Guidance "Making prescribed alterations to maintained schools", it is expected that all LA's and Governing bodies "will ensure open and fair consultation with parents and other interested parties to gauge demand for their proposed changes and to provide them with sufficient opportunity to give their views". Consultation events were conducted at all three LA maintained Special Schools, led by the Head Teacher and supported by the Assistant Director for Children's Services and other LA Officers.

In accordance with DfE Guidance "Making significant changes to an open academy", any proposed changes for an academy must be subject to fair and open local consultation, with all those who could be affected by the proposed change, and that

the proposal takes into account of all responses received. All Trusts facilitated their own consultation events for those associated with the school, supported by LA Officers and the Lincolnshire Parent Carer Forum.

The Lincolnshire Parent Carer Forum held their own consultation events to ensure parent/carers of children and young people with SEND were provided with an arena to discuss the proposals which was separate from Special Schools and the LCC. At these events, LA Officers presented the proposed strategy answering any subsequent questions, followed by small group discussions hosted by LPCF volunteers.

Three public meetings were convened in Lincoln, Boston and Sleaford by LCC to enable all other interested parties to find out about the strategy, raise questions and contribute to the consultation.

For the purpose of this report each consultation events will be summarised outlining attendance and key discussion points.

The consultation events facilitated by Lincolnshire Parent Carer Forum were deemed to be independent of either school or the LA and their members were given the opportunity to discuss the strategy without LCC or school involvement. The findings of the LPCF events, provided by Chairperson, Coralie Cross, can be viewed in Appendix i.

School Events (in order of occurrence)

Warren Wood – A Specialist Academy, Gainsborough
16th Jan'18 (2 events - afternoon and evening)

20 friends of the school in attendance.

Event hosted by Gary Nixon, Executive Principal of Mayflower Academy Trust and Michael Page, Chair of Mayflower Academy Trust. Supported by Heather Sandy, Assistant Director, Children's Services and other LA Officers. Also present: LPCF Chair and volunteers.

Those in attendance at the afternoon event were provided with a presentation by Gary Nixon and Heather Sandy outlining the proposed strategy and how the model would be likely to impact this school specifically. Questions were answered as part of the main group and then the audience separated into two smaller groups to discuss the strategy in detail and ask specific questions. A number of LA Officers and school representatives were available to answer specific questions.

At the evening event, numbers were significantly lower than anticipated so Gary Nixon and Heather Sandy held a small group discussion to outline the strategy and answer any questions presented.

Key Discussion Points:

- Reassurance that the strategy did not support the blanket return of pupils to mainstream school.
- Reassurance that the LA was fully committed to ensuring that no pupil would be forced to change schools.
- Reassurance that pupils at Warren Wood could continue their secondary education at The Aegir School as parents were concerned that friendship groups would be separated.
- Interest in how the satellite provision would be developed and who would be able to access it.
- What are the funding arrangements for the proposals and would this mean more money for schools in general?
- When the strategy was going to be implemented and what it would mean for Warren Wood?
- Reassurance that there would not be any changes to the transport policy and that those who currently receive transport would continue to do so.
- Reassurance that there would not be any risk to Gainsborough's 16-19 provision
- Who would be running the proposed free school in Lincoln? Would this have a detrimental effect on the Gainsborough schools?
- Did the School Governors and Trustees support the proposals?
- How was the health offer for each school going to improve under the proposals?

Support for the proposed strategy was voiced by many parents and staff at the event. In general, those in attendance were reassured by both Gary Nixon and Michael Page's support for the strategy and trusted the school leadership to make the best decision for their pupils. Parent/carers recognised that the school already operates on an all needs basis and they were happy that this approach had been recognised as the future vision for all Special Schools.

The Aegir School, Gainsborough
18th Jan'18

23 friends of the school in attendance.

Event hosted by Gary Nixon, Executive Principal of Mayflower Academy Trust and Michael Page, Chair of Mayflower Academy Trust. Supported by Heather Sandy, Assistant Director, Children's Services and other LA Officers. Also present: LPCF Chair and volunteers.

Those in attendance were provided with a presentation by Gary Nixon and Heather Sandy outlining the proposed strategy and how the model would be likely to impact this school specifically. Questions were answered as part of the main group and then the audience separated into two smaller groups to discuss the strategy in detail and ask specific questions. A number of LA Officers and school representatives were available to answer specific questions.

Key Discussion Points:

- Reassurance that the strategy did not support the blanket return of pupils to mainstream school.

- Reassurance that the LA was fully committed to ensuring that no pupil would be forced to change schools.
- Interest in how the satellite provision would be developed and who would be able to access it?
- Whether the local grammar school would be supporting the satellite pilots and getting involved?
- What are the funding arrangements for the proposals and would this mean more money for schools in general? Could more money be accessed now outside the proposed strategy?
- When the strategy was going to be implemented and what it would mean for The Aegir School?
- Parent/Carers recognised that their school was very well equipped to meet the needs of most pupils but identified some potential for improvements to meet the needs of pupils with SLD/PMLD.
- Reassurance that there would not be any changes to the transport policy and that those who currently receive transport would continue to do so.
- Reassurance that there would not be any risk to Gainsborough's 16-19 provision.
- Parents would like to see an improved offer for post-19 provision locally, particularly for pupils with SLD/PMLD who may not be able to access Lincoln College or other local providers?
- Who would be running the proposed free school in Lincoln? Would this have a detrimental effect on the Gainsborough schools? LCC provide assurances that if the free school proposal was to go ahead, all decision making process would be open and transparent.
- Did the School Governors and Trustees support the proposals?
- How was the health offer for each school going to improve under the proposals? Parents raised concerns regarding therapy provision which has been fed into the ongoing work with health commissioners.

Support for the proposed strategy was voiced by many parents and staff at the event. It was most evident that parents trusted the school leadership to make the right decision for its pupils, and families and were reassured by their support for the strategy. Parent/carers recognised that the school already operates on an all needs basis and they were happy that this approach had been recognised as the future vision for all Special Schools.

St Francis Special School, Lincoln
22nd Jan'18

9 friends of the school in attendance.

Event hosted by Ann Hoffman, Executive Head Teacher and Heather Sandy, Assistant Director, Children's Services. Supported by Nigel Sisley, Chair of Governors and LA Officers. Also present: LPCF Chair and volunteers.

Those in attendance were provided with a presentation by Ann Hoffman and Heather Sandy outlining the proposed strategy and how the model would likely to impact on this school specifically. As the attendance was quite low and only included 4

parent/carers, it was decided that a small group discussion would be the most appropriate way to explore the proposed strategy, with LA Officers and the Executive Head Teacher available to respond to questions raised.

Prior to the consultation event, a letter had been received by Debbie Barnes, Director, Children's Services from a School Governor expressing his concern about All Needs provision. The author highlighted the potential risks for schools losing their specialisms and recommended the three proposed schools within Lincoln City be considered as meeting all needs across the schools, thereby removing the need to alter current designations.

Key Discussion Points:

- How did the LA/School propose to ensure all pupils would have their needs fully met within an all needs setting? Significant concern was raised about keeping pupils with complex medical needs safe from pupils who are more mobile and may present with some hard-to-manage behaviours?
- The group, in principal, could understand why the all needs model had been chosen but would have preferred Lincoln city locality to develop a slightly different model – where all needs could be met across both St Francis and St Christopher's rather than replicating it in both schools.
- One parents and one school Governor expressed strong opinions that St Francis should retain its specialism.
- Reassurance that parental preference would not diminish.
- Would St Francis lose its comprehensive health and therapy provision as more pupils with complex medical needs attend their nearest school?
- Would other schools be pulling resources from their school i.e. health provision, specialist staffing?
- How are staff going to be upskilled to meet the wider range of needs within the school?
- What would the capital investment programme fund at St Francis?
- Reassurance that the LA were committed to ensuring that no pupil would be forced to change schools.
- Interest in how the satellite provision would be developed and who would be able to access it? How will it be funded?
- Reassurance that the strategy did not support the blanket return of pupils to mainstream school and that pupils with SEND would not be negatively impacted by accessing mainstream opportunities.
- Reassurance that there would not be any changes to the transport policy and that those who currently receive transport would continue to do so. Concerned that the strategy is being driven by transport costs.
- How did the strategy propose to address post-19 provision for pupils with SEND?
- Support for the proposals regarding St Christopher's and the new free school but challenge regarding the historical closure of Queens Park School.
- Are supported internships being considered as part of the strategy?
- Clarity required on the future of residential provision at St Francis.
- Letter to schools not parent friendly - people didn't understand it.

At the event one parent and a Governor raised their concerns regarding the proposed changes to St Francis. Whilst recognising the challenges that many of their own pupils experience, undertaking long and difficult journeys to access the county's only specialist PD school, there was some resistance to making changes to the existing provision. Specific concerns relating to pupil safety and levels of expertise were expressed. Reassurance was provided by the Executive Head Teacher regarding the development of the workforce development plan which would be fully supported by the skilled and experienced staff at St Francis and that the capital investment programme would ensure that the premises and facilities would support the introduction of a wider range of needs into the school. The Executive Head Teacher also identified the significant shift in the pupil cohort that had already occurred at St Francis and that a much wider range of need was already being met.

St Christopher's School, Lincoln

25th Jan'18

12 friends of the school in attendance.

Event hosted by Ann Hoffman, Executive Head Teacher and Heather Sandy, Assistant Director, Children's Services. Supported by Helen Todd, Acting Head Teacher and LA Officers. Also present: LPCF Chair and volunteers.

Those in attendance received a presentation by Ann Hoffman and Heather Sandy outlining the proposed strategy and how the model would be likely to impact on this school specifically. Questions were answered as part of the main group and then the audience separated into smaller groups to discuss the strategy in more detail and asked specific questions. A number of LA Officers and school representatives were available to answer specific questions.

Key Discussion Points:

- Reassurance that the LA were committed to ensuring that no pupil would be forced to change schools.
- How did the LA/School propose to ensure all pupils would have their needs fully met within an all needs setting? How would school ensure the safety of all pupils in an all needs setting?
- How does the funding for this project work? What are the plans for St Christopher's as it is hugely over-capacity and the premises needs significant development?
- How would the problems around car parking and the limited scope for expansion be managed? Parents offered a number of suggestions for improvements that should be made to the school.
- Increased capacity across all Special Schools was welcomed.
- How are staff going to be upskilled to meet the wider range of needs within the school?
- How was the health offer for each school going to improve under the proposals? Parents raised concerns regarding therapy provision which has been fed into the ongoing work with health commissioners.
- Discussion around the impact of the proposed new free school in Lincoln and how this would affect pupils at St Christopher's? Who was going to run it?

- As the proposed new free school would be taking on a number of pupils from St Christopher's to address its over-capacity, how would transition be managed?
- How would the reduction in school numbers be managed and its potential impact on staff?
- Discussion around the closure of Queens Park School and its impact on St Christopher's – parents expressed their dissatisfaction at this historical decision. LCC position reaffirmed regarding the reasons behind the Queens Park closure.
- Opportunities for extended day and school clubs and groups were explored. Parents supported the idea of school being the centre of the child's community and appreciated the benefits of local provision.
- Parents were interested in the proposals on Special School satellites and keen to understand more about the role of mainstream schools in the strategy.
- Did the strategy support further 16-19 provision and could the school develop this?
- Parents questioned whether having three all needs schools in the city was triplicating provision?

There was considerable positivity expressed towards the strategy by those in attendance. Once the strategy had been fully explained, parents and interested parties offered a number of suggestions as to how they would like to see the school improved. Parents and staff were encouraged by the potential development work proposed to the school and recognised the need to reduce school numbers to a more appropriate size.

Gosberton House Academy, Gosberton

26th Jan'18

33 friend of the school in attendance.

Event hosted by Louise Stanton, Head Teacher and Heather Sandy, Assistant Director, Children's Services. Supported by LA Officers. Also present: LPCF Chair and volunteers and Andy Breckon, Chair of Lincolnshire Education Trust.

Those in attendance received a presentation by Louise Stanton and Heather Sandy outlining the proposed strategy and how the model would be likely to impact this school specifically. It was suggested that small groups would best enable open discussion but some parents were not in agreement and expressed a preference for open floor questions. This was facilitated by Heather Sandy to enable open discussion to take place. Small group discussions were then facilitated by LA Officers.

Key discussion points:

- How did the LA propose to ensure all pupils would have their needs fully met within an all needs setting? Significant concern was raised about "diluting" the specialist provision within Gosberton House Academy and no longer being able to meet the needs of pupils with Autism and Social and Communication need.
- Some parents present appreciated some aspects of the strategy but could not agree to Gosberton House Academy losing its specialism as an Autism school. Parents and Parent Governors expressed strong opinions that Gosberton House Academy should retain its specialism.

- How does the LA propose to ensure Gosberton House Academy retains its National Autism Society accreditation and would other schools be expected to work to this standard?
- Expressed concerns that parental preference would not diminish.
- Would other schools be pulling resources from this school i.e. specialist staffing required to support other schools?
- How are staff going to be upskilled to meet the wider range of needs within the school?
- What would the capital investment programme fund at Gosberton House Academy?
- Reassurance that the LA was committed to ensuring that no pupil would be forced to change schools.
- Some parents requested commitment from the LA that they pupils would be able to transfer to The Priory School for secondary provision. For others, this was not a requirement.
- Parents proposed extending the age range of Gosberton House Academy to 14 though this is not viable due to natural number on role analysis. This option has been considered by the Project Board.
- Interest in how the satellite provision would be developed and who would be able to access it? How will it be funded?
- Reassurance that the strategy did not support the blanket return of pupils to mainstream school and those pupils with SEND would not be negatively impacted by accessing mainstream opportunities. Parents expressed that some pupils at Gosberton House Academy have not had positive experiences of mainstream, so considering a return via satellite provision could be detrimental to their education and wellbeing.
- Reassurance that there would not be any changes to the transport policy and that those who currently receive transport would continue to do so. Concerned that the strategy is being driven by transport costs.
- Some questioned the validity of the consultation.
- Why not have more specialist provision for pupils with Autism across the county so pupils don't have to travel long distances to get here?

There was strong opposition to the proposed changes to this school as identified in the discussion points raised. Some parents did state that parts of the strategy could be seen as beneficial for other schools but the impact of the proposed change on Gosberton House Academy would be too much to accept. Overwhelmingly, those present did not wish to see Gosberton House Academy change to meet a wider range of needs.

John Fielding School, Boston

29th Jan'18

15 friends of the school in attendance.

Event hosted by Daran Bland, Executive Head Teacher. Supported by Heather Sandy, Assistant Director, Children's Services, Peter Bell, CEO of Community Inclusive Trust and LA Officers. Also present: LPCF Chair and volunteers.

Those in attendance were provided with a presentation by Daran Bland and Heather Sandy outlining the proposed strategy and how the model would be likely to impact this school specifically. Open floor discussion followed, along with further small group discussion to enable detailed discussion with LA Officers.

Key Discussion Points:

- Reassurance that the LA was committed to ensuring that no pupil would be forced to change schools.
- Reassurance that the strategy did not support the blanket return of pupils to mainstream school.
- Parent/Carers were supportive of integration and inclusion across all education providers.
- Those present were keen to hear about relocation and redevelopment plans for John Fielding School and how it would impact pupils, families and staff.
- Managing staff recruitment due to expansion.
- Reassurance that class sizes would not increase with additional pupils.
- Managing transition to the new school. Where would the new school be?
- Would pupils and parents have a say in the design of the new school?
- Interest in how the satellite provision would be developed and who would be able to access it? Access to the wider curriculum and other opportunities.
- How was the health offer for each school going to improve under the proposals? Parents raised concerns regarding therapy provision which has been fed into the ongoing work with health commissioners.
- Reassurance that there would not be any changes to the transport policy and that those who currently receive transport would continue to do so.

Many in attendance expressed support for the proposed changes to the school and were excited about the prospect of having a school which had the right space and facilities for its pupils. Parents and staff did not express concerns regarding the provision of all needs and felt reassured that the new premises would support this level of inclusion. Some very pertinent questions were raised, particularly around managing transition and ensuring the experience of change is planned and seamless for pupils with SEND.

St Lawrence School, Horncastle

30th Jan'18

13 friends of the school in attendance.

Event hosted by Lea Mason, Executive Head Teacher of Lincolnshire Wolds Federation and David Rhodes, Chair of Lincolnshire Wolds Federation. Supported by Heather Sandy, Assistant Director, Children's Services and other LA Officers. Also present: LPCF Chair and volunteers.

Those in attendance received a presentation by Lea Mason and Heather Sandy outlining the proposed strategy and how the model would be likely to impact this school specifically. Open floor discussion was facilitated as those in attendance were happy to contribute to the consultation as a larger group.

Key Discussion Points:

- Reassurance that the LA were committed to ensuring that no pupil would be forced to change schools.
- If the strategy is approved, what are the plans and timeline for implantation?
- Likely effect on St Lawrence pupils and families?
- Proposed development plans for St Lawrence.
- Importance of accessing the right provision over travel time and how parent/carers best address this dilemma.
- Reassurance that there would not be any changes to the transport policy and that those who currently receive transport would continue to do so.
- Relationship with mainstream schools and how this can be developed. Proposed Special School satellite pilot and how beneficial it would be to have some middle-ground between the two types of education.
- How was the health offer for each school going to improve under the proposals? Parents raised concerns regarding therapy provision which has been fed into the ongoing work with health commissioners.
- Reassurance that the strategy did not support the blanket return of pupils to mainstream school.
- Need for post-16 provision in Horncastle area.
- Those in attendance did not have significant concerns regarding the provision of all needs as school already provides this.

Those present talked enthusiastically about the proposed strategy and were keen to find out more about the proposed development of the premises. Some parent/carers expressed concern about their ongoing dilemma balancing the challenges of long journey times with access to the right education and were reassured that all county Special Schools would be benefitting from investment and were committed to meeting a wider range of needs.

Lincolnshire Wolds Federation, responsible for St Lawrence and St Bernard's School has subsequently written to Debbie Barnes, Director of Children's Services to expressing their full commitment to the strategic vision for SEND provision.

Willoughby School, Bourne

1st Feb'18

17 friends of the school in attendance.

Event hosted by James Husbands, Head Teacher and Heather Sandy, Assistant Director, Children's Services. Supported by Andrew Hancy, Chair of Governors and LA Officers. Also present: LPCF Chair and volunteers.

Those in attendance received a presentation by James Husbands and Heather Sandy outlining the proposed strategy and how the model would be likely to impact this school specifically. Questions were answered as part of the main group and then the audience separated into two smaller groups to discuss the strategy in more detail

and asked specific questions. A number of LA Officers and school representatives facilitated these groups.

Key Discussion Points:

- Concerns were raised about the impact of expanding the school so significantly. How would this impact on class sizes, staffing etc.?
- Reassurance that all changes to the school would be part of a planned program of works and everything would be done to ensure it has limited impact on pupils.
- Reassurance that the LA was committed to ensuring that no pupil would be forced to change schools.
- If the strategy is approved, what are the plans and timeline for implantation?
- Reassurance that there would not be any changes to the transport policy and that those who currently receive transport would continue to do so.
- How are staff going to be upskilled to meet the wider range of needs within the school?
- It was noted by a parent that she thought that money was being spent in the wrong place. Mainstream schools are not committed to the learning and the educational progress of pupils with SEND and funding should be invested in these settings to enhance their provision.
- Parents at Willoughby welcomed the proposed Special School satellite provision and could see many pupils benefitting from this pilot.
- How was the health offer for each school going to improve under the proposals? Parents raised concerns regarding therapy provision which has been fed into the ongoing work with health commissioners.
- Parent/Carers were supportive of integration and inclusion across all education providers.

Many in attendance expressed their support for the strategy and welcomed the additional capital investment proposed for Willoughby School. Concerns were raised regarding issues not directly related to the strategy (EHCP process) and many parents were worried about the level of support provided for pupils with SEND in mainstream schools. Those in attendance did not appear to have significant concerns regarding the provision of all needs as school already meets a wide range of needs.

The Chair of Governors at Willoughby School has subsequently written to Debbie Barnes, Director of Children's Services expressing their full commitment to the strategic vision for SEND provision.

St Bernard's School, Louth

1st Feb'18

9 friends of the school in attendance.

Event hosted by Lea Mason, Executive Head Teacher of Lincolnshire Wolds Federation and David Rhodes, Chair of Lincolnshire Wolds Federation. Supported by Heather Sandy, Assistant Director, Children's Services and other LA Officers. Also present: LPCF Chair and volunteers.

Due to the relatively low number of parent/carers attending this event, Lea Mason and Heather Sandy explained the strategy and responded to questions and concerns raised within a small group. This allowed for open discussion to take place.

Key Discussion Points:

- Reassurance that the strategy did not support the blanket return of pupils to mainstream school.
- Reassurance that the LA was committed to ensuring that no pupil would be forced to change schools.
- Interest in how the satellite provision would be developed and who would be able to access it?
- Impact of change to all need and whether it would impact on class sizes.
- Future of residential provision at St Bernard's?
- Letter to schools not parent friendly - people didn't understand it.
- Length of time to implement and complete the proposed building work and level of disruption.

Those in attendance expressed their support for the proposals and particularly welcomed the capital investment for their school. It was noted that St Bernard's is one of the schools where improvements to the premises are essential to enable wheelchair access across the whole estate and therefore parents were keen to see changes made.

The Priory and Garth Schools, Spalding 6th Feb'18

16 friends of the school in attendance.

Event hosted by Daran Bland, Executive Head of Spalding Special Schools Federation. Supported by Heather Sandy, Assistant Director, Children's Services and LA Officers. Also present: LPCF Chair and volunteers.

Those in attendance were provided with a presentation by Daran Bland and Heather Sandy outlining the proposed strategy and how the model would be likely to impact this school specifically. Open floor discussion followed, along with further small group discussion towards the end of the event to enable further discussion with LA Officers.

Key Discussion Points:

- Need to understand more about the proposed amalgamation of The Priory and The Garth Schools and how this would impact on the education of the pupils. What would be the benefits and would there be detrimental effects e.g. class sizes?
- Is there sufficient capacity proposed for the school? Impact of the new John Fielding School.
- Transition would require careful planning for pupils and families.

- Reassurance that the strategy did not support the blanket return of pupils to mainstream school.
- Reassurance that the LA was committed to ensuring that no pupil would be forced to change schools.
- Interest in how the satellite provision would be developed and who would be able to access it? Who would run it?
- Is there adequate funding allocated for such wide-scale changes?
- Provision across the two schools is already meeting all needs and confident that the proposals would ensure that they could meet need with better resources and facilities.
- How was the health offer for each school going to improve under the proposals? Parents raised concerns regarding therapy provision which has been fed into the ongoing work with health commissioners.

Many in attendance expressed their enthusiasm for the proposal. Some valuable comments were raised regarding capacity and sustainability and also around the importance of inclusion and integration in the Special School environment. Additionally, an excellent example of mainstream and special collaboration was highlighted by the school, with a pupil being supported to attend the mainstream school next door for GCSE triple science.

The Eresby School
19th Feb '18

11 friends of the school in attendance.

Event hosted by Michele Holiday, Executive Head Teacher. Supported by Heather Sandy, Assistant Director, Children's Services and LA Officers. Also present: LPCF Chair and volunteers.

Those in attendance were provided with a presentation by Michele Holiday and Heather Sandy outlining the proposed strategy and how the model would be likely to impact this school specifically. Open floor discussion followed, along with further small group discussion towards the end of the event to enable further discussion with LA Officers.

Key Discussion Points:

- Reassurance that the LA were committed to ensuring that no pupil would be forced to change schools.
- Interest in how the satellite provision would be developed and who would be able to access it? Level of mainstream commitment?
- Support for the satellite provision once it did not encourage segregation of pupils with SEND – should focus on inclusion and integration.
- Is there adequate funding allocated for such wide-scale changes?
- How are staff going to be upskilled to meet the wider range of needs within the school?
- Ensuring adequate post-16 and post-19 provision for the locality.

Many parents in attendance welcomed the proposals for Eresby School and felt that it was a positive and reaffirming move forward. One parent even commented that it was "probably too good to be true". Some thoughtful questions and concerns were raised and parents provided LCC Officers with a good insight into the challenges faced by pupils with SEND in rural localities.

The Sandon School and Ambergate Sports College
6th March'18

13 friends of the school in attendance.

Event hosted by James Ellis and Stela Plamenova, Executive Head Teachers. Supported by Heather Sandy, Assistant Director, Children's Services, Peter Bell, CEO of the Community Inclusive Trust, Daran Bland and LA Officers. Also present: LPCF Chair and volunteers.

Those in attendance were provided with a presentation by James Ellis, Stela Plamenova and Heather Sandy outlining the proposed strategy and how the model would be likely to impact these schools specifically. Small group discussions followed, this allowed questions and concerns to be addressed and answered with LA Officers.

Key Discussion Points:

- Interested to understand more about the proposed amalgamation of The Sandon School and Ambergate Sports College and how this would impact on the education of the pupils. What would be the benefits and would there be detrimental effects e.g. class sizes.
- Reassurance that the LA was committed to ensuring that no pupil would be forced to change schools.
- Discussion around mainstream schools and their SEND provision – how will the strategy impact them?
- Interest in how the satellite provision would be developed and who would be able to access it? Who would run it?
- Is there adequate funding allocated for such wide-scale changes?
- Provision across the two schools is already meeting all needs and confident that the proposals would ensure that they could meet need with better resources and facilities.
- Concerns were raised regarding SEMH provision in the Grantham area; parents were worried about pupils with only SENH needs attending Special Schools.

Many in attendance expressed their enthusiasm for the proposed developments to the Sandon and Ambergate Schools. Some valuable comments were raised regarding managing the proposed amalgamation of two schools effectively and also about the placement of pupils with SEMH in Special Schools.

Public Consultation Events

LCC Public Consultation – Boston
26th Feb'18

Hosted by Debbie Barnes, Director, Children's Services, with presentation of the strategy by Heather Sandy, supported by Special School Leaders and LA Officers. Also present: LPCF Chair and volunteers.

Attendance - 19 including:

9 Parent/Carers

8 School Employees

2 Other Professionals.

Some individuals in attendance had already attended the LPCF Spalding event and raised objections to the changes proposed to Gosberton House Academy at this event. These individuals were familiar to LCC as parent/carers with connections to Gosberton House Academy and the Autism community, campaigning against the proposed strategy.

Key Discussion Points:

- Significant challenge presented regarding the proposed funding; belief that it is inadequate and the proposals are not feasible.
- That there has not been sufficient work undertaken regarding the proposed building work for each school and the proposal is not viable.
- That there has not been sufficient work undertaken with health commissioners to implement the therapy provision identified in the strategy.
- Strong opposition from those in attendance associated with Gosberton House Academy and the Autism community that all needs provision would not provide an acceptable educational environment for pupils with Autism and that there needs should be met within an Autism specialist provision.
- Attendees questioned LCC's motives for the strategy suggesting its priority is reducing transport costs.
- A small number of attendees alleged that undue pressure had been placed on the Head Teacher at Gosberton House Academy to support the plans. Questions were asked about what would happen if Gosberton House Academy did not change to all needs provision.
- Concern that the strategy restricts parental preference.
- Suggested that the strategy was focused on placing all pupils back into mainstream schools.
- Questions rose regarding the provision of Special School satellites e.g. level of mainstream commitment, similarity to historical speech and language units, pupils being forced back into mainstream school.

Discussion at the event was dominated by the questions and opposition presented by those campaigning against the proposed changes to Gosberton House Academy.

LCC Public Consultation - Sleaford
27th Feb'18

Hosted by Debbie Barnes, with presentation of the strategy by Heather Sandy, supported by Special School Head Teachers and LA Officers. Also present: LPCF Chair and volunteers.

Some individuals in attendance had previously attended the LPCF Spalding event and the LCC Boston event and re-iterated their objections to the proposals for Gosberton House Academy. Also at this event, objections were raised against the proposed strategy and individual LA Officers were targeted with negative comments via placard.

Attendance: 12 including:
9 Parent/Carers
1 School Staff
2 Others.

Key Discussion Points:

- Significant challenge presented regarding the proposed funding; that it is inadequate and the proposals are not feasible.
- That there has not been sufficient work undertaken regarding the proposed building work for each school and the proposal are not viable.
- That there has not been sufficient work undertaken with health commissioners to implement the provision identified in the strategy. Inadequate and under-resourced therapy provision would not be able to support all needs provision.
- Strong opposition from those associated with Gosberton House Academy and the Autism community that all needs provision is not an acceptable educational environment for pupils with Autism and that there needs should be met within an Autism specialist provision.
- Some individuals accused the LA of promoting its own strategic agenda and not consulting with schools and parents, despite the extensive ongoing consultation.
- Some attendees questioned LCC's motives for the strategy and that its priority is reducing transport costs.
- Questioned the validity of the consultation process, in terms of breadth of consultation, despite the extensive ongoing consultation.
- One attendee alleged that undue pressure had been placed on the Head Teacher at Gosberton House to support the plans.
- Suggestion to extend the age range at Gosberton House.
- Concern that the strategy restricts parental preference.
- Why does the strategy not support the addition of a Special School in Sleaford?
- Reassurance that there would not be any changes to the transport policy and that those who currently receive transport would continue to do so.
- Support for collaborative working between education and health
- How are staff going to be upskilled to meet the wider range of needs within the school?

Discussion at the event was dominated by the questions and opposition presented by those campaigning against the proposed changes to Gosberton House Academy.

LCC Public Consultation – Lincoln
5th March'18

Hosted by Debbie Barnes, with presentation of the strategy by Heather Sandy, supported by Special School Leaders and LA Officers. Also present: LPCF Chair and volunteers.

Attendance - 14 including:

5 Parent/Carers

5 School Staff

4 Others.

Key Discussion Points:

- Future plans for St Francis and St Christopher's Schools, regarding governance.
- Likely impact of the proposals on the Lincoln schools?
- Reassurance that the LA were committed to ensuring that no pupil would be forced to change schools.
- Reassurance that placement in Out of Country arrangements would continue, where already in place.
- Discussion around mainstream schools and their SEND provision – how will the strategy impact them?
- Interest in how the satellite provision would be developed and who would be able to access it? How are they going to be different to the autism units previously developed?
- Is there adequate funding allocated for such wide-scale changes?
- How are staff going to be upskilled to meet the wider range of needs within the school? Additional training for mainstream?
- Reassurance that there would not be any changes to the transport policy and that those who currently receive transport would continue to do so.
- Concern that the strategy restricts parental preference.
- Discussion regarding the merits of primary and secondary provision and all though provision. Why does the strategy endorse both options?
- It was noted that the language in the report was not autism-friendly and also LCC's engagement with the autism strategy was raised.
- It was raised that some Special Schools were discriminating against pupils identified as having challenging behaviour.

LPCF Consultation Events

Please see Appendix i for a report on the Lincolnshire Parent Carer Forum consultation events.

4. Consultation Survey

Introduction

Two consultation surveys were developed by the LCC Community Engagement team, in conjunction with SNAP Surveys; one specifically for adults and one for children and young people. Lincolnshire Parent Carer Forum advised on the design of the survey to ensure it was user-friendly. Links to the surveys were placed on the

dedicated webpage for the strategy, in order to ensure all information was altogether and accessible.

The adult survey asked responders to identify their relationship to/involvement with SEND in order to ascertain levels of support and opposition from specific groups. It also requested four digit postcode information, so geographical clusters of similar opinions could also be identified. This level of information ensured the responders were not identifiable and all information held would be in accordance with the Data Protection Act 1998.

The children and young people's survey was also accessible via the dedicated webpage and varied only slightly from the adult version. Responders were asked to identify which school they attended to provide data surrounding levels of support or opposition in specific schools. Again, this level of information ensured the responders were not identifiable and all information held would be in accordance with the Data Protection Act 1998.

Both surveys were design using a five-point Likert scale based on the five key messages of the strategy with an additional question on the need for building work in schools. In addition, in the adult survey, parents were directed to an additional question regarding the likelihood of them requesting a change of school if the strategy is adopted and implemented. All responders were then asked if there was anything else they would like to contribute. Each statement was followed by an open text box providing responders with ample opportunity for free text to ensure their contribution to the consultation could be detailed.

There has been a small number of complaints received about the design of the survey, suggesting bias towards a positive outcome. LCC strongly believes that there was no intention of bias with the survey statements; they were key statements taken directly from the strategy on which the consultation was based. The scaling allowed for respondents to vary their responses from a strongly disagreed position through to a strongly agreed one. The survey also provided free text boxes for respondents to provide additional comments. This has provided a rich source of information for consideration around the consultation. The survey questions were developed in partnership with the Lincolnshire Parent Carer Forum who suggested the use of Likert scaling and "smiley faces" as their experience is that parents and carers respond well to this method of questioning and LCC supported this.

The adult survey was completed by 609 responders and the children's survey completed by 58 respondents. As the questions on the surveys varied slightly, the findings from the surveys will be presented separately.

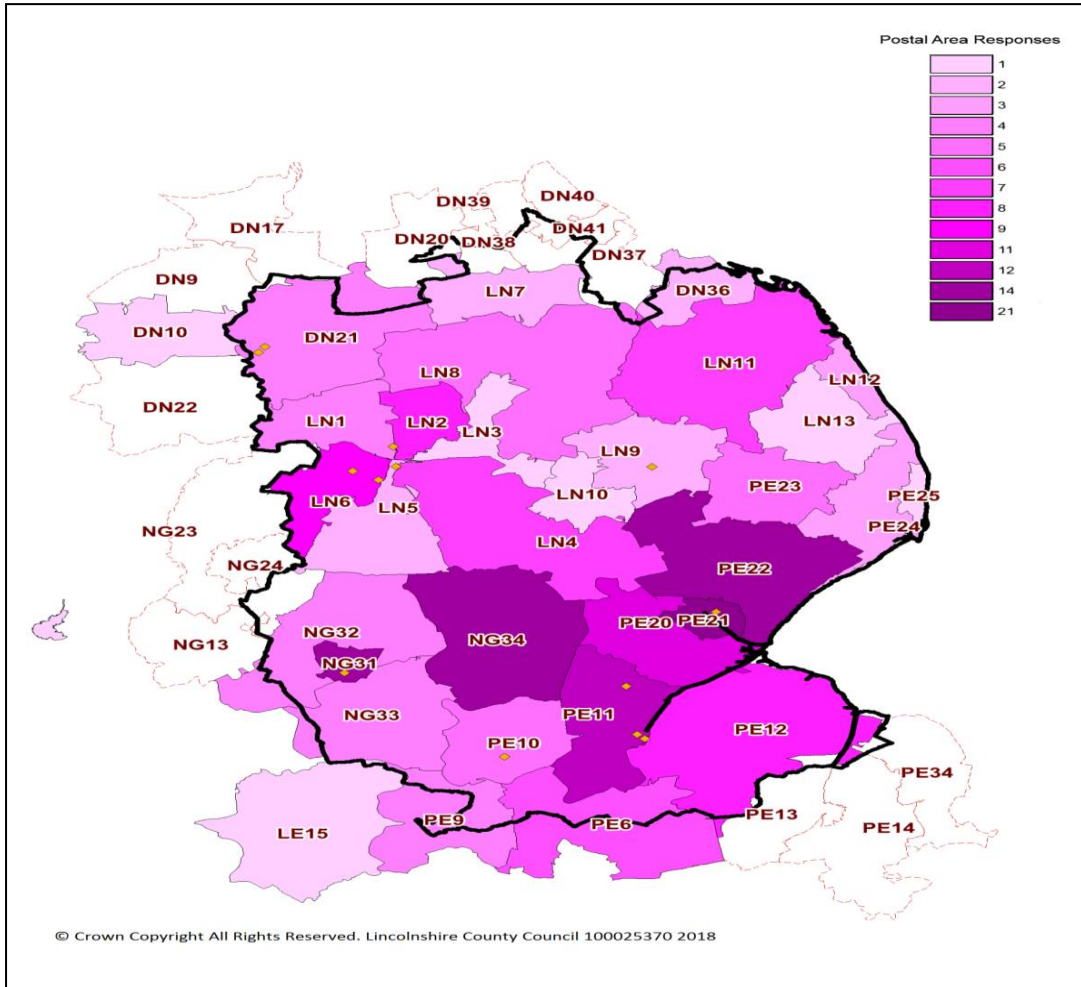
With regards to data confidence, for a target population of 5,000 people, with a reasonably representative spread of respondent category type and geography, we would need 387 responses to give us a 95% level of confidence that views received are representative of the target population, with a 5% margin of error. With 667 responses the surveys confidence margin has been assessed as 99% (+/- 5%).

It should also be noted that some adult responders completed the children's survey though we are unsure as to whether this was intentional or in error. The text boxes

indicate that some responses are clearly from children, some are from adults and some have no narrative in the boxes so we cannot identify the type of responder. Therefore the findings from the children's survey will be presented as they have been received; it cannot be assumed that they fully reflect the opinions of children and young people only.

Analysis of Survey Responses

Geographical Distribution of Responses



The adult survey requested the first four characters of postcodes from anyone identifying as a parent and the post code distribution of these surveys are represented on this map. It shows a broad range of responses from across the county with a hotspot of responses around Boston and surrounding postal areas. There is a notable return from the Spalding, Grantham and Sleaford areas too.

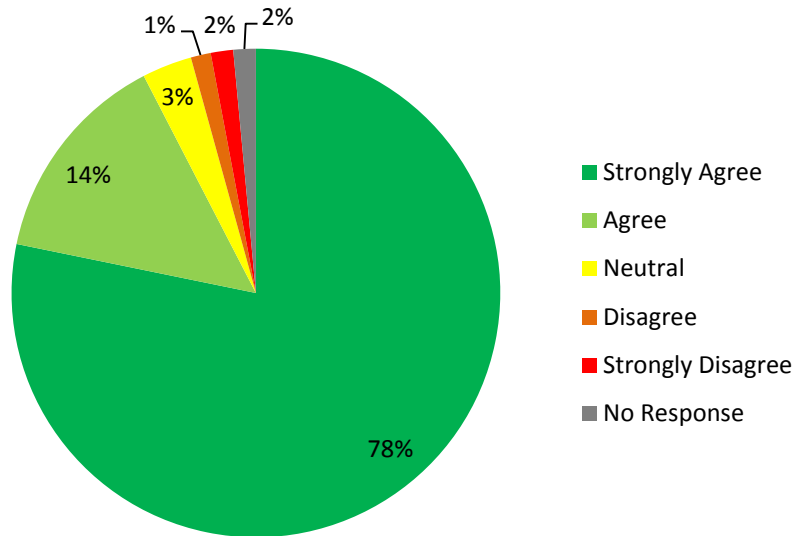
Adult Responses

For each statement in the survey, a pie chart reflects the overall response to the statement ranging from agree strongly to disagree strongly. Alongside this chart is a graph presenting the level of agreement to the statement from each category of respondent. The report highlights some of the recurring themes from the text box responses

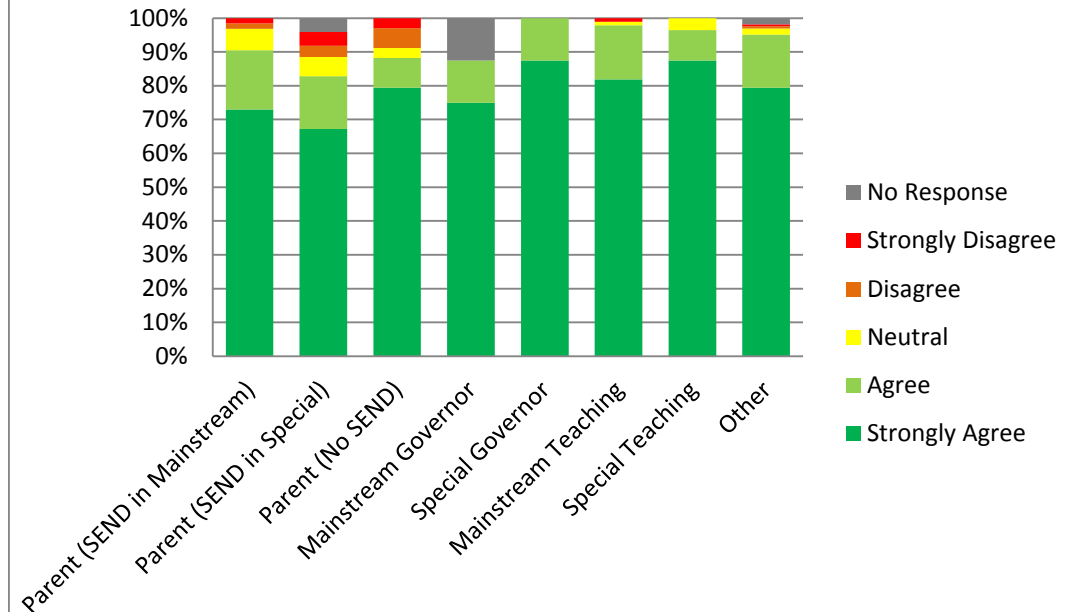
Statement 1

Pupils with SEND should be able to attend a Special School as close to home as possible

Overall Response to Statement 1



Breakdown: Type of Respondent



Responses to statement 1 were overwhelmingly positive with 543/597 agreeing strongly and agreeing with the statement. 9 people did not respond to this statement.

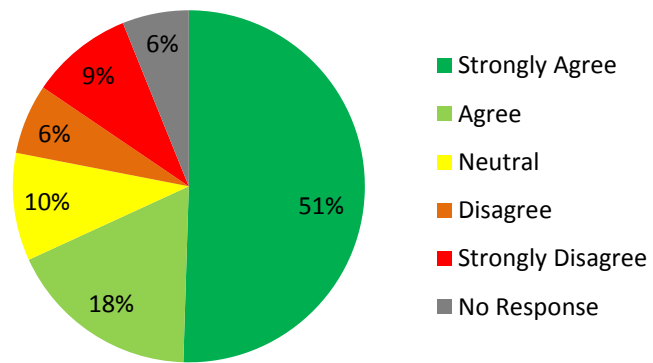
With reference to the type of respondent, the group who strongly agreed with this statement the least, only 67% of parents with a child in Special School strongly agreed with this statement. Many who did agree also commented that suitable provision was just as important as location.

597 responded		1. Pupils with SEND should be able to attend a Special School as close to home as possible
Agree	93%	Key Themes: <ul style="list-style-type: none"> • Long journeys to school have a negative impact on pupils and families. It effects energy levels, ability to learn, increased anxiety, undue stress for parent/carers and loss of family experiences. • Pupils with SEND should be able to access a school which is equipped to meet their needs without excessive travel. • Attending a local school allows pupils to be part of their community. • For many respondents, access to the right school with the right facilities and staffing is more important than travelling long journeys to school. • Once the nearest school can meet the needs of all pupils in its community. • More support in mainstream schools for pupils with SEND would enable them to access their education in their local community. • Parental preference should be paramount. • Need to ensure schools have enough capacity for pupils to go to their local school. • What is best for the child is the most important thing. Education standards should not be compromised for this to happen. • There should be a limit on how far a child should have to travel. • The needs of pupils with Autism are different and therefore they cannot be met in a school which meets all needs – journey time is not the most important factor. • Once no child is forced to change school for this to happen.
Neutral	3%	
Disagree	3%	

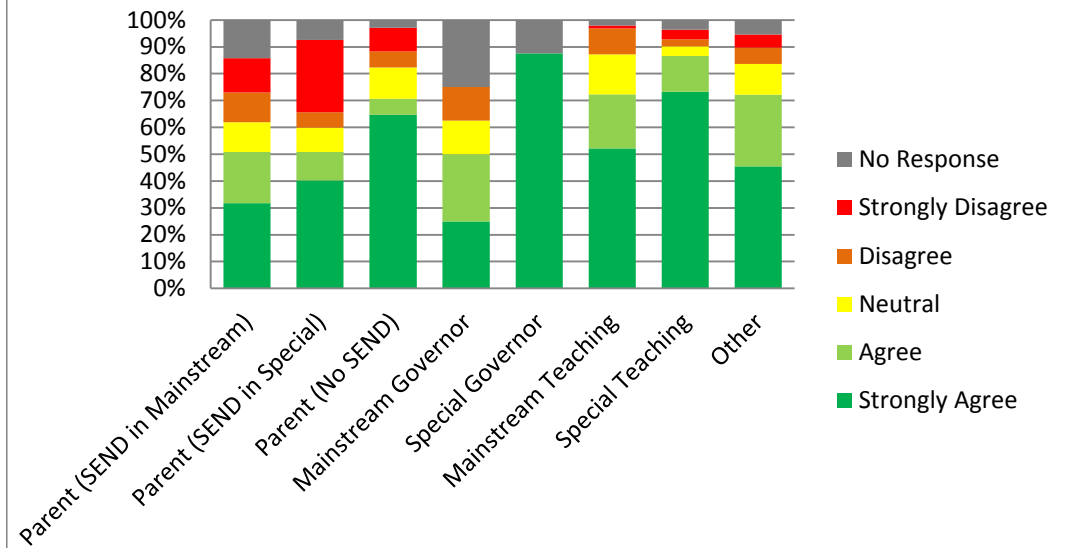
Statement 2

Special Schools should be fully inclusive, with pupils with all types of needs and disabilities educated together

Overall Response to Statement 2



Breakdown: Type of Respondent



Statement 2 was the second least supported statement across the whole survey, with only 69% of responders agreeing strongly or agreeing with the statement.

From the type of respondent breakdown, it is clear that parents with children with SEND in both special and mainstream schools had some reservations about the proposals for fully inclusive Special Schools, with only 50% agreeing with the statement.

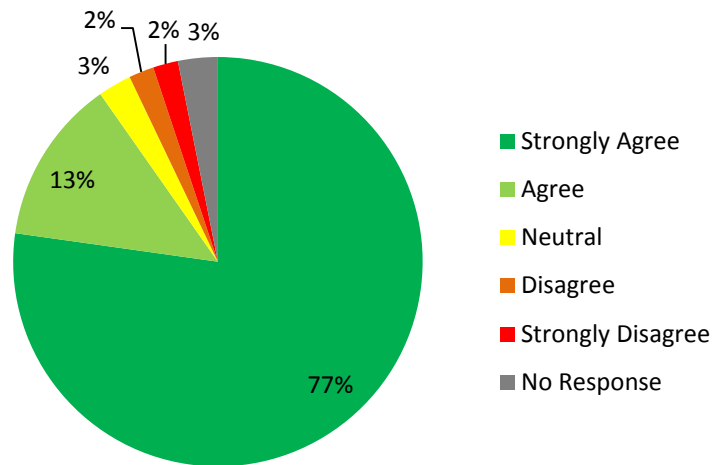
However, all Special School Governors who responded supported the principal.

569 responded		1. Special Schools should be fully inclusive, with pupils with all types of needs and disabilities educated together
Agree	69%	Key Themes: <ul style="list-style-type: none"> • Fully inclusive schools represent the variety of society and encourage greater acceptance and understanding. • Pupils with SEND do not fit into categories; schools should be able to meet the individual needs of pupils in their local community. • Inclusive schools need to have the right facilities and resources to meet all needs. • Inclusive schools need to have the right staffing with the right skills and experience to meet all needs. • Agreement in principal but the safety of all pupils must be the priority. • Must be to the benefit of all pupils. • Could be very challenging for schools and staff to manage. Difficult to implement. • Pupils should be educated in an environment which best suits their needs; this could be together in a school but taught in classes with pupils with similar needs. • Teach abilities and similar ages together but provide opportunity for integration throughout the school day. • SEND education should not be one size fits all and the needs of individual pupils must be met. • Children with ASD and other social, learning and communication needs require a completely different educational environment to other pupils with SEND. This specialism must remain an option for parents. • Risk of diluting specialisms.
Neutral	10%	
Disagree	15%	

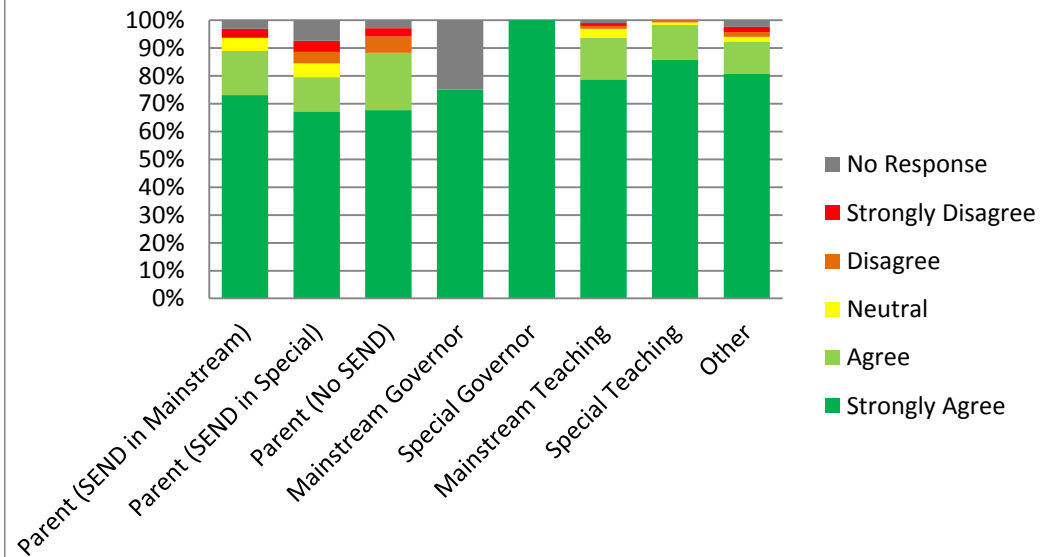
Statement 3

Wherever possible, Lincolnshire pupils with SEND should be educated in Lincolnshire

Overall Response to Statement 3



Breakdown: Type of Respondent



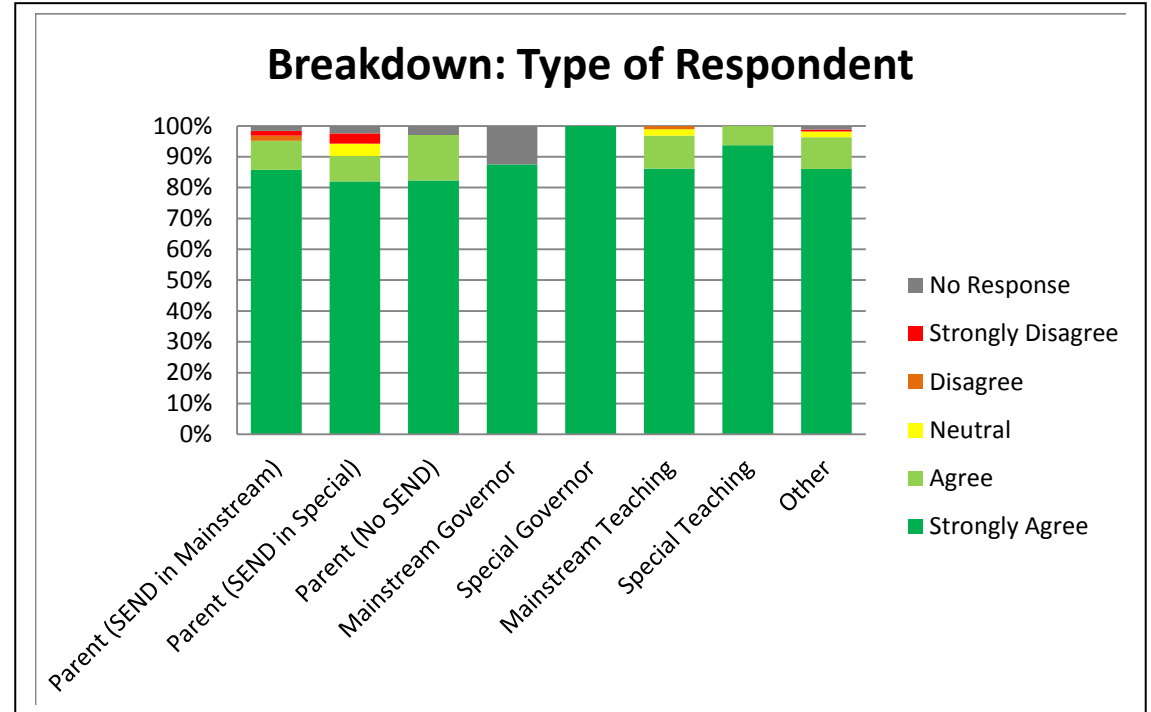
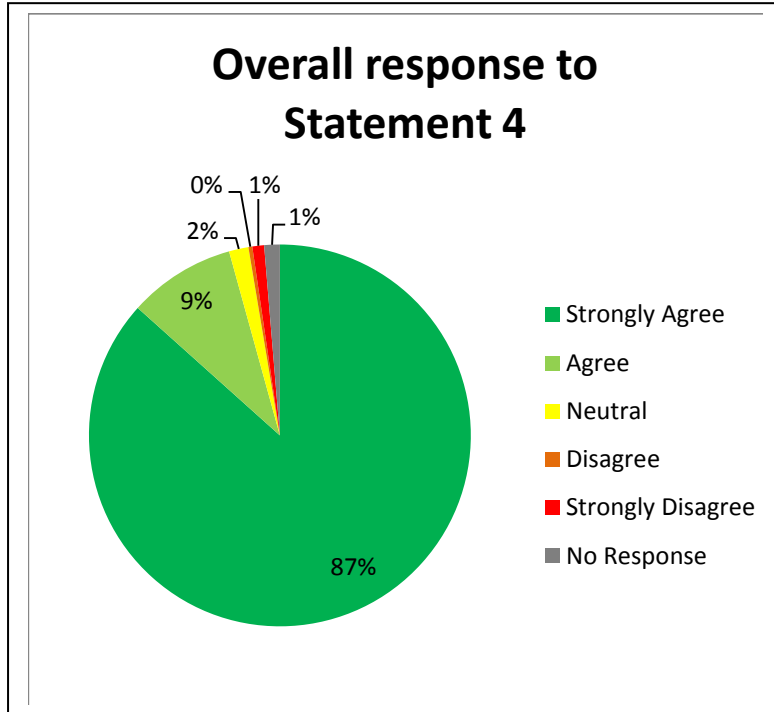
The principal of educating Lincolnshire pupils within Lincolnshire was well supported in the survey. Overall, 90% of respondents agreed with the statement.

Across the range of respondent, those in agreement/strong agreement varied from 79% to 100%. Perhaps understandably, parents of pupils attending Special School agreed with this statement least as some will have children who need to access specialist Out of County provision or children attending a Special School across the county border.

587 responded		3. Wherever possible, Lincolnshire pupils with SEND should be educated in Lincolnshire
Agree	90%	Key Themes: <ul style="list-style-type: none"> Lincolnshire schools should be able to provide the right education for all of its pupils. Educating children a long way from their home and families can cause significant distress and may be detrimental to the family. Being educated out of county can affect social and life skills and makes maintaining family life difficult. The cost of educating pupils in out of county provision could be re-invested into improving Special Schools in Lincolnshire. Where pupils live close to the county border and a school in another county is nearer, this should be accessible. For pupils with very specialist needs, out of county schools may provide the most appropriate education. Pupils should go to the most appropriate setting to meet their needs.
Neutral	3%	
Disagree	4%	

Statement 4

Children and young people with SEND should have access to the right education, health and care provision regardless of where they go to school

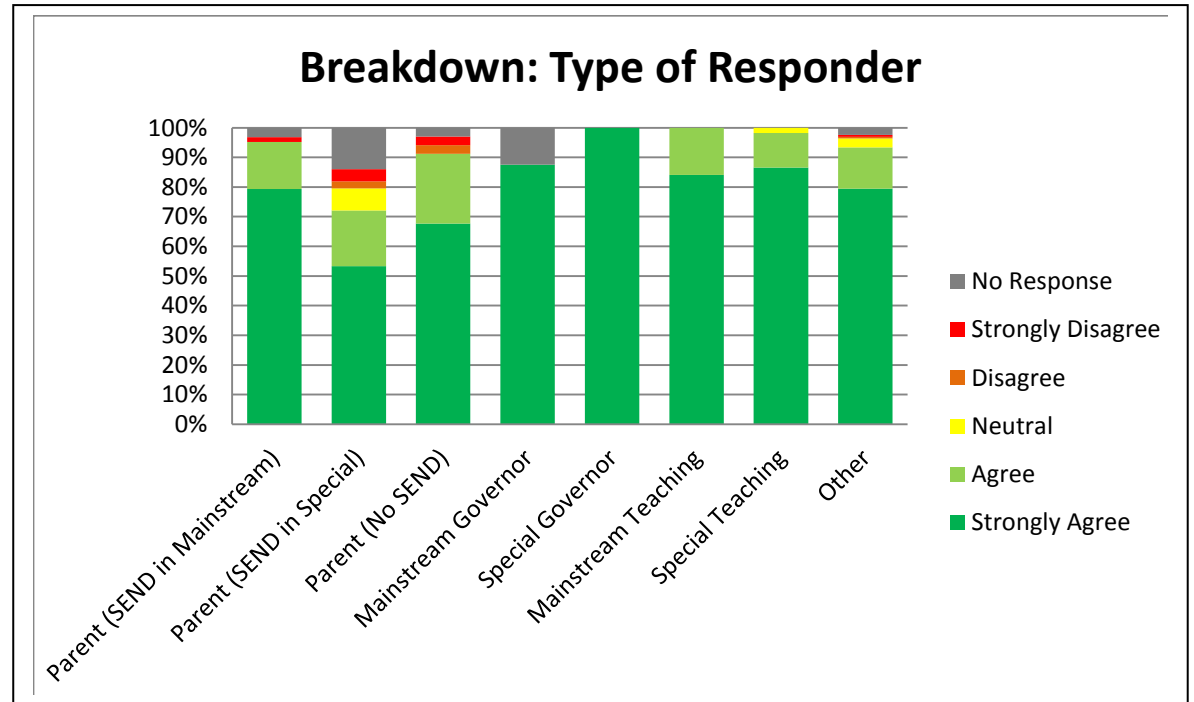
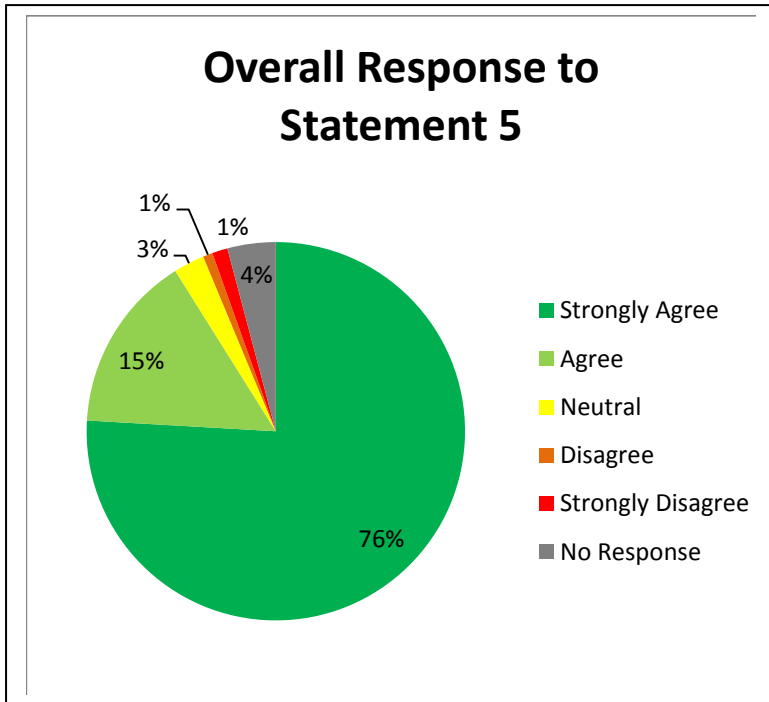


This statement received overwhelming support across all surveys, with only 1% strongly disagreeing. Across the range of respondents, the primary message of "right education, in the right place at the right time, as close as possible to home" was well supported by between 90% - 100% of respondents.

598 responded		4. Children and young people with SEND should have access to the right education, health and care provision regardless of where they go to school
Agree	96%	Key Themes: <ul style="list-style-type: none"> • This should be an absolute given for all pupils with SEND in Lincolnshire, whether they attend mainstream or Special School. • Every child has a right to an education that meets their needs. • Many Special Schools are already providing the right education but need additional resources regarding health and care provision. • The Education, Health and Care Plan process should ensure all schools provide this for pupils with SEND. • Equity of provision is essential and schools should have equitable access to health and therapeutic provisions. • Education and health provision needs to be integrated. • This is not possible in all needs schools; the right education should be specialist provision for pupils with ASD. • Getting the right education, health and care provision should not be a "fight" for parent/carers. • Schools should be identifying what support and resources are required to meet all needs.
Neutral	2%	
Disagree	1%	

Statement 5

Special Schools and mainstream schools should work together so that pupils with SEND receive good quality education in the right school at the right time for them.



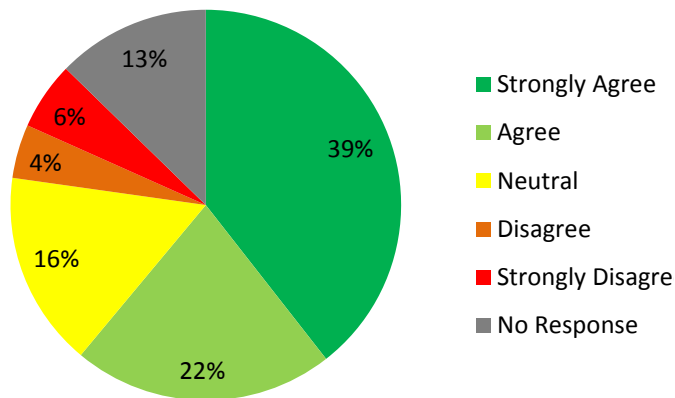
The survey saw overwhelming support from the mainstream school respondents for the statement relating to greater shared working across the sector. 71% of parents with children in Special School agreed with this statement and those who did not agree highlighted concerns regarding mainstream schools ability to meet the needs of pupils with SEND; some citing negative experiences.

581 responded		5. Special Schools and mainstream schools should work together so that pupils with SEND receive good quality education in the right school at the right time for them
Agree	91%	Key Themes: <ul style="list-style-type: none"> • Greater integration and collaboration across mainstream and Special Schools would provide pupils with SEND with more social and academic opportunities. • Flexibility across the sector would support pupils who need access to the mainstream curriculum with the support of Special School staff. • Staff could benefit from closer working by sharing knowledge and experience. This would benefit pupils across both types of school. • Greater collaboration between schools would support inclusion and break down barriers. • Concerns regarding the additional pressures on mainstream schools and whether pupils with SEND are deemed a priority. • Concerns about the impact this may have on mainstream pupils. • Support for current Outreach initiatives such as the Working Together Team and the Physical Disability Outreach Service. • Needs to be directed by the needs of the individual pupils; not a blanket approach to accessing mainstream. • Idea needs to be supported by additional staffing and resources. • Concerns around bullying of pupils with SEND; others felt this would increase acceptance. • Supported transition between schools is key.
Neutral	3%	
Disagree	2%	

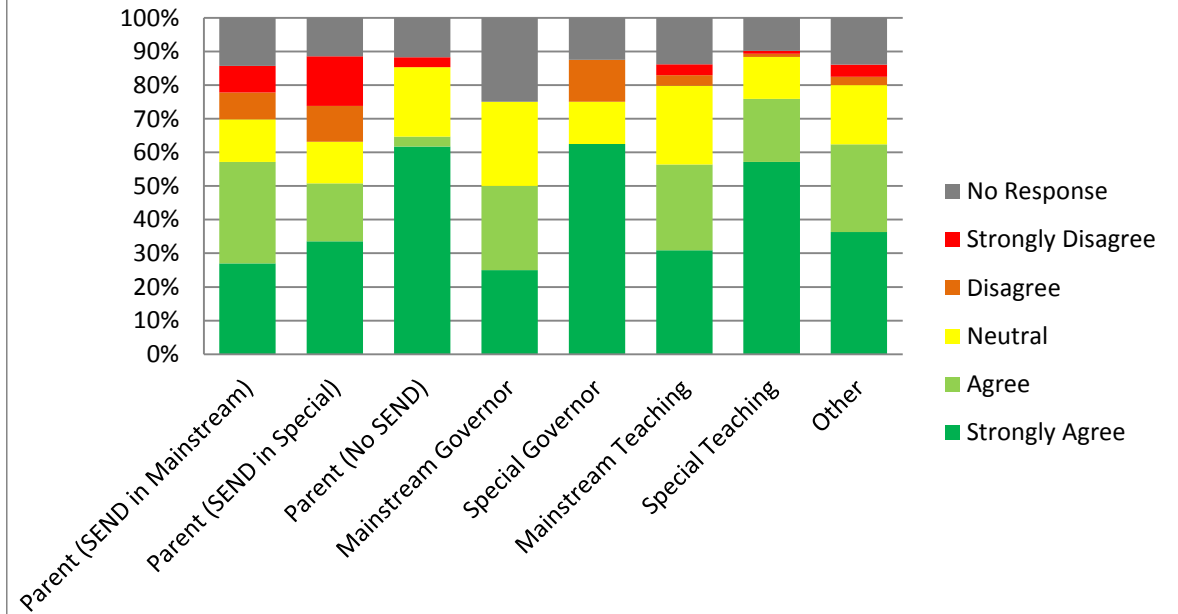
Statement 6

If the strategy is adopted it will mean significant investment and development of existing Special Schools. Building work could cause disruption in your school.

Responses to question 9



Respondent Percentages for Q9

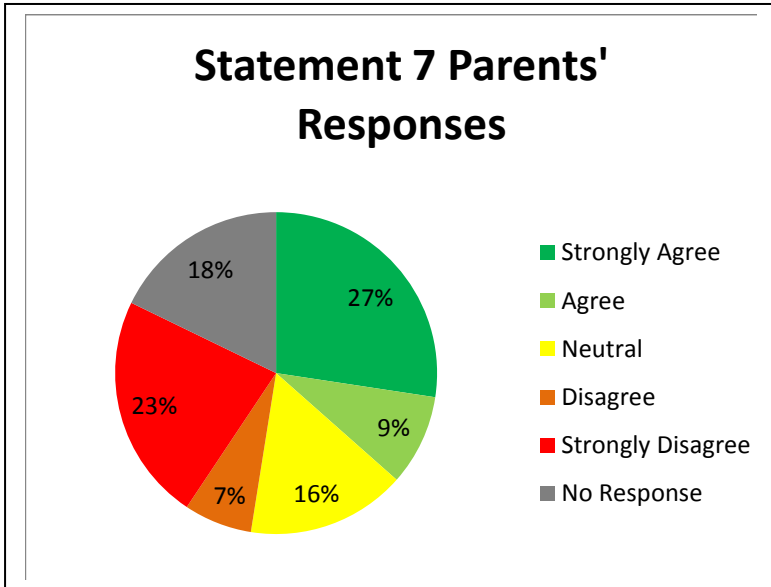


Statement 6 was the least supported statement across the whole survey, with only 61% of responders agreeing strongly or agreeing with the statement. It is clear from the responses that any building works within schools will need to be managed in a way which causes minimal disruption to pupils and their education.

529 responded		6. If the strategy is adopted it will mean significant investment and development of existing Special Schools. Building work could cause disruption in your school. (This statement asked people to rate their support for potentially disruptive change)
Agree	61%	Key Themes: <ul style="list-style-type: none"> • High level of support for this as the majority of Special Schools require additional facilities and improvements to their premises. Viewed as a positive step forward. • If the school is going to benefit from better facilities, this would be acceptable. • Needs to be project managed carefully with minimal disruption to pupils with SEND. • Good communication with parents and pupils about the planned developments. • Valuable suggestions provided from respondents about how to complete the work with minimal disruption. • Concerns for pupils with SEND and the potential distress building work may cause.
Neutral	19%	
Disagree	10%	

Statement 7: Parents only

If the strategy was adopted and Special Schools were ready to provide for all needs, how likely would you be to request a move for your child to the nearest Special School?



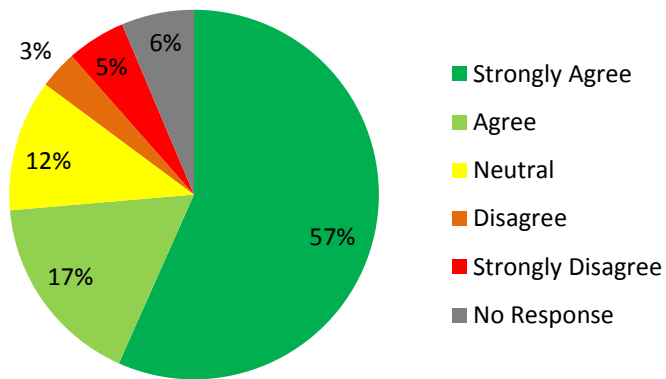
This statement was included to ascertain how parents felt about the prospect of a change of school for pupils with SEND, if a nearer school could meet need. It is clear, with only 36% of respondents agreeing with the statement, that for many pupils change of school is not a consideration at this stage.

199 responded		If the strategy was adopted and Special Schools were ready to provide for all needs, how likely would you be to request a move for your child to the nearest Special School?
Agree	36%	Key Themes: <ul style="list-style-type: none"> • Support for the proposed strategy and some parents expressed that they would be keen to move their children to a school closer to home, if it could meet their needs. • Support for the proposed strategy but some parents expressed that they would not seek to change their child's education setting as they are happy and settled. • Concerns regarding transport allocation if parents chose to move to a nearer school.
Neutral	16%	
Disagree	30%	

Children and Young People's Survey

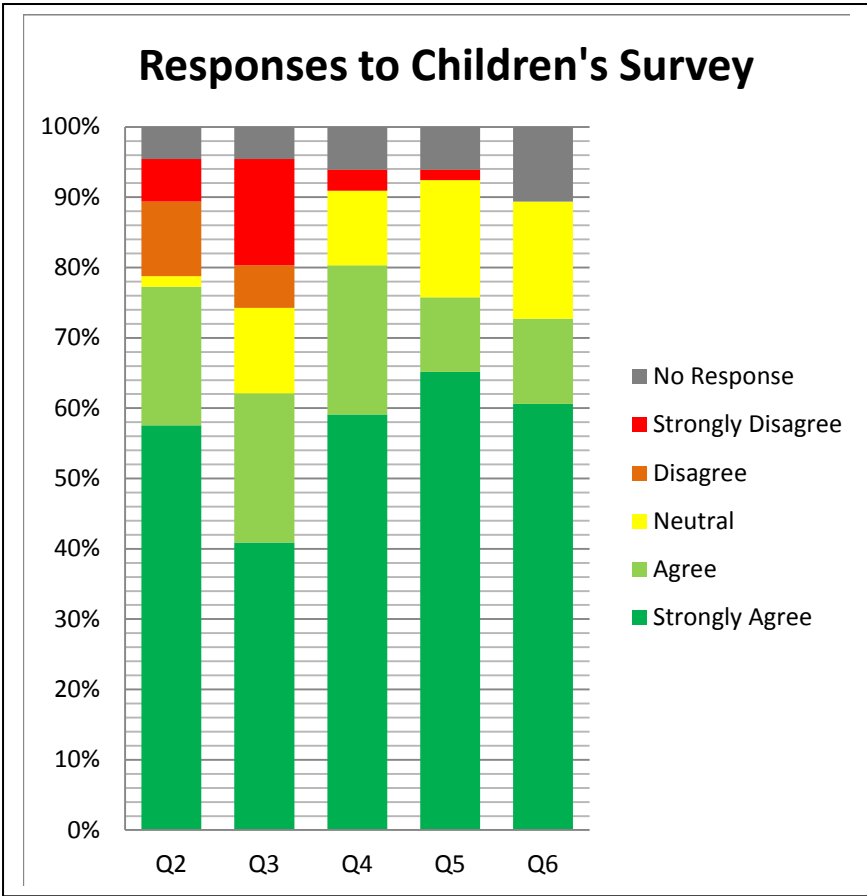
As highlighted previously, the contributions to the children and young people's survey cannot be considered as the view of young people as a number of adults completed this survey. This was apparent from the comments within the text boxes. Therefore only a brief overview of findings from this survey will be presented as it cannot be deemed reliable in presenting the views of its intended cohort.

Children's Survey Overall Responses



Of those 58 respondents who completed the children and young people's 14 could be identified as children or young people, whilst the remaining 44 were either identifiable as parents as they cited having children in a Special School or not identifiable as either due to not comments.

74% of the whole cohort agreed strongly or agreed with the statements overall with 8% disagreeing or disagreeing strongly.



Statement Q2: Children and young people with special education needs and disabilities should be able to go to a school as close to home as possible.

Statement Q3: Special Schools should include children and young people with all kinds of needs and disabilities taught together.

Statement Q4: Wherever possible children and young people with special educational needs and disabilities who live in Lincolnshire should be able to go to school in Lincolnshire.

Statement Q5: Children and young people with special education needs and disabilities should be able to get the right education, health and care provision no matter where they go to school.

Statement Q6: Special Schools and mainstream schools should work together so that children and young people with special educational needs and disabilities get a good quality education in the right school at the right time for them.

Survey Outcome

The consultation survey was completed by 667 respondents and the contributions have provided LCC and Special School Leaders with a valuable insight into the experiences of those associated with SEND.

Overall, the survey has indicated that there is considerable support for the proposed strategy, with all key strategic messages being supported by between 61% and 96% of respondents. The only statement which was not supported by the majority was where parents were asked to identify if they would consider moving their child to a nearer school – this was met with significant opposition. However, as the proposed strategy does not require any pupil to move schools against their wishes, this should not be a concern if the strategy is adopted.

From the qualitative responses to each statement, some key themes emerged as highlighted in the tables above. These key themes mirror the discussions across the consultation.

Key Themes from the survey:

- The importance of pupils having access to the right education, as close as possible to home – these two priorities should not be exclusive.
- Some opposition to All Needs provision from schools required to make the most significant change to need catered for.
- Concern about how all needs will be met in one setting– schools must have the right resources and staff training.
- Pupils with SEND need a system of education which meets all of their individual needs, both in Mainstream and Special Schools.
- Access to the right health and care provision, regardless of where pupils are educated.
- Parents of children and young people face too many barriers and challenges when it comes to getting their loved ones the right interventions and education, including long journeys to school.
- The pressure on availability of Special School places and the changing needs of pupils with SEND means that the current system is unsustainable.

Where the survey did present concerns and challenges, they related mostly to the proposed changes to All Needs provision. Strong opposition was presented through the survey comments, by a small number of respondents, to the proposed changes for Gosberton House Academy, claiming these changes would significantly diminish the standard of education provided.

5. SEND Mailbox and other methods of consultation

In order to ensure that the consultation provided ample opportunity for interested parties to make their contributions, a variety of other consultation mechanisms were provided. Comments and further questions were invited via the SEND Communities mailbox and all emails received through this route were acknowledged and detailed responses provided where specific questions were submitted. One submission of

questions did not have any contact detail to respond to, so these have been included in the "Building Communities of Specialist Provision: Consultation Responses".

In total, 25 individuals submitted 37 emails to the SEND Communities inbox, within the following categories:

Schools = 4 respondents.

College = 1 respondent.

Parent/Carers = 15 respondents.

National Deaf Children's Society = 1 respondent.

School Governor = 1 respondent.

Linkage Trust = 1 respondent.

Member of Parliament = 1 respondent.

Not specified in email = 1 respondent.

The key themes within the correspondence received via email and letter have been summarised in the table below.

All emails directly contributing to the consultation have been made available to the Executive Councillor to support decision making processes.

Summary of contributions via the SEND mailbox

Issue's Raised	Number of responders
Responder opposed to the proposals as specialisms as the specific needs of children with Autism are significantly different and require a completely different environment and learning support. All needs provision will dilute the standards within specialist schools.	13/25
Responder opposed to the proposals as specialisms as the specific needs of children with physical and medically complex disabilities are significantly different and require a completely different environment and learning support. All needs provision will dilute the standards within specialist schools.	3/25
Responder opposes all needs provision and suggests that Lincoln should be all needs across 2 schools.	1/25
Responder opposed to the strategy as it removes parental preference.	4/25
Responder believes that the right school trumps any travel concerns.	4/25
Responder believes that more attention needs to be given to educational achievement, Aspirational academic opportunities for those that can without 'rounding down'. This should also include improved 16-19 provision.	4/25
Responder believes that assessment and implementation of EHC plans for pupils with Autism, in mainstream settings needs improving, as does access to a range of therapies.	5/25
Responder believes that pupils should not be placed in private educational settings due to concerns about quality and safeguarding.	1/25
Responder believes that the proposals are based on inaccurate data.	3/25
Responder believes that increased capacity would be welcome.	1/25
Responder is concerned that pupils will be forced to change schools under the proposals.	2/25
Responder believes that, if school does not move to all needs provision, that funding will be withdrawn or the school will be massively disadvantaged.	3/25
Responder believes that the identified funding allocation is inadequate and the proposed model cannot be implemented for monies stated. Challenge to costings and whether the model is viable?	6/25
Responder is concerned that the strategy does not identify how the specific needs of deaf children will be met.	1/25
Responder welcomes the improved links with mainstream schools, including satellites. How can they support this?	4/25
Responders strongly believe this investment should be aimed at developing more specialist autism schools or, at least, extending the age range of Gosberton House Academy.	9/25
Responder believes that the strategy does not do enough to address the mental health needs of children.	1/25

Responder believes that properly managed transition is a good thing and pupils who wish to change schools should be well-supported.	1/25
Responder believes that the strategy is just a money saving exercise.	2/25
Responder does not believe that research supports all needs provision. The LA has not done enough research to back up the strategy.	2/25
Responder agrees with principle of nearest school to fit child's needs.	1/25

Third Sector Contributions

Consultation responses have been submitted from two third sector providers; The National Deaf Children's Society (NCDS) and Linkage Community Trust. Both are service providers in Lincolnshire and have a keen interest in the proposals within the strategy.

The National Deaf Children's Society contacted the SEND Project Office by telephone on 31st January 2018 to discuss the proposed strategy further and consider how it may impact deaf children and young people. A formal response was submitted to the consultation on 1st March 2018, raising six key concerns/questions:

1. Reassurance that parental preference is paramount and that no family would be placed at a disadvantage if they chose to remain at their current school.
2. Reassurance that Out of County provision would continue to be available where it provides the most appropriate education for children and young people.
3. Concern that the strategy promotes a "return to mainstream" approach and that this will have a detrimental effect on Special School viability.
4. The organisation requires more detail regarding the planned capital investment program and reassurance that the needs of deaf pupils will be included in the plans.
5. Concern that the strategy does not specifically identify a core offer for deaf children.
6. The organisation requires further information regarding the workforce development plans within the proposal.

The LA has responded to these concerns via telephone discussion with NCDS Regional Director, Martin Thacker with both the SEND Project Officer and Service Manager - SEND, LCC.

The Linkage Community Trust submitted their contribution to the consultation on 13th March 2018 after engaging in discussions with their parent/carers, their education committee and Linkage Trustees and attending a number of consultation events. The following comments/concerns were raised:

1. Expressed concerns regarding the limited opportunities for transition in the proposed model. It was felt that the experience of children and young people with SEND should reflect the same opportunities and experiences of pupils in mainstream and that transition from primary to secondary to further education can be beneficial for individual growth and development.
2. Parents/Carers were particularly interested in how the strategy sought to support pupils accessing mainstream and welcomed the concept of satellite provision presented once they supported inclusion and integration.
3. The Linkage Community Trusts welcomes the strategy as an opportunity and that no pupil would be required to change school.
4. The organisation raised concerns that the strategy assumes pupils will remain in school post-16 and does not fully address the importance of specialist provision for young people aged 16-19 years.
5. The organisation raised the issue of early identification of mental health in pupils and suggested the strategy could address this in more detail.

6. The organisation expressed concerns around the challenges presented to schools in educating All Needs in one setting and stressed the importance of upskilling staff.
7. The organisation expressed concerns that parental choice would be impacted by the strategy. Whilst acknowledging the detrimental effect of excessive travel school allocation has on some pupils, Linkage Community Trust sought reassurance that parental choice would be respected.

The organisation welcomed the opportunity to work in partnership to fulfil the aspirations of the strategy and stressed the importance of children and young people receiving an educational programme which meets individual's needs.

Additional Opportunities

In line with Government advice on consultations, it was deemed appropriate to offer alternative methods of communication, most appropriate to the group being consulted with.

A dedicated telephone line was provided enable interested parties to contact the SEND Project Office and make their contributions. One call was received via this method, requesting additional information.

Two interested parties requested and received a telephone call from the Senior Project Officer to discuss aspects of the strategy in further detail. Both parties subsequently submitted their contribution to the consultation in writing, based on the reassurances provided during the telephone discussion.

7. Mainstream School Consultation

The proposed strategy encourages greater collaboration between mainstream and Special Schools, particularly with the proposed Special School satellite pilot which will see enhanced SEND provision, led by Special School staff, within mainstream schools. In order to ensure mainstream school leaders are fully aware of the proposals which may impact on their provision, opportunities for consultation were accessed.

The LCC Spring Leadership briefings were held in early March'18 at venues across the county and Heather Sandy presented the proposed strategy and model to Early Years, Primary, Secondary and Special School Leaders from 229 schools.

Comments and questions were welcomed as were expressions of interest for the Special School satellite provision pilot. 11 schools have since submitted their expressions of interest for the satellite pilots.

Key Discussion Points:

- Timeline and implementation.
- Request for more information regarding the proposed Special School satellite provision.
- Details of the capital investment programme.

- More information regarding the governance of the proposed new free school.
- Importance of parental choice in allocating a Special School.

The strategy has been well received by School Leaders and support for the project was expressed at all Leadership Briefings. One Head Teacher spoke as a grandparent and welcomed the proposed changes and LCC's commitment to pupils with SEND.

In addition, the proposed strategy has been presented for consideration and consultation at both the Lincolnshire Learning Partnership Board (LLPB) and Schools Forum. The LLPB has approved the proposed strategy and fully endorses the vision for greater collaboration across the sector.

The strategy was presented to the Schools Forum on 18th Jan'18 and the following comments were submitted to the consultation.

Key discussion points:

- Timescale and implementation.
- Importance of a recruitment analysis to ensure adequate and "best possible" staffing provision for Special Schools.
- Need to ensure mainstream commitment to the strategy for it to be effective.

8. LCC Response to Consultation

Lincolnshire County Council is fully committed to ensuring that this consultation process is conducted in line with DfE recommendations, in an open, fair and responsive manner. LCC has endeavoured to respond to all direct communication (with the exception of the surveys) to ensure all interested parties had a clear understanding of the proposed strategy and their concerns addressed.

Unfortunately, there has still been a significant amount of misinformation and rumour associated with the strategy, which has encouraged strong opposition to the proposals from some members of the Autistic community and friends of Gosberton House Academy, as highlighted in this document.

In order to address the concerns and questions raised throughout the consultation, LCC has published its response to the key discussion points presented. This document has been published on the dedicated webpage www.lincolnshire.gov.uk/SENDCommunities .

9. Media and Social Media Coverage

A comprehensive communication plan was developed to support the period of consultation, ensuring a wide range of potentially interested parties were made aware of the proposed strategy and opportunities to consult. The strategy was publicised across a range of local media and social media outlets. A media briefing was held by Cllr Bradwell, Deputy Leader , LCC and Debbie Barnes, Director, Children's Services to launch the consultation on Monday 8th January 2018 and

subsequent articles and social media messages were published throughout to ensure the consultation remained high in the public's awareness.

LCC has presented the proposed strategy and consultation opportunities through the social media channels of Facebook and Twitter, regular reminders were issued through these forums to find out more about the strategy and to encourage people to engage with the consultation process. These forums were not used to respond to any challenges or questions raised throughout the consultation period.

Petitions

Lincolnshire County Council has received two petitions regarding the proposed strategy; one in support of the strategy and one opposing the specific proposed changes to Gosberton House Academy.

The Safeguarding Autism Provision Petition (Gosberton House)

This petition opposed the proposed changes to Gosberton House Academy and was submitted on 19th April 2018, five weeks after the consultation period had ended and outside of LCC's petition schedule. This was reviewed by Legal Services, LCC who advised that the petition could still be considered as a contribution item to the consultation. This petition was forwarded to the Lincolnshire Education Trust on 20th April 2018 to be considered as part of the Gosberton House Academy consultation.

The petition has been supported by 5610 signatories from the following locations:

- 40% Lincolnshire residents.
- 58% Other UK residents.
- 2% Non-UK residents.

The petition has been reviewed by LA Officers and significant concerns have been raised regarding the level of misinformation presented within the preamble.

- **The petition was addressed to Coralie Cross as Chair of LPCF.** LPCF are neither the decision maker for the strategy nor can they campaign on behalf of their members.
- **LCC are proposing changes to the school.** In line with DfE guidelines, all significant changes to an academy must be proposed by the Academy Trust and can only be approved by the Regional Schools Commissioner on behalf of the DfE. LCC is neither the proposer nor decision maker for academies.
- **The strategy proposes to "make one size fit all" for Special Schools.** Special School leaders have worked with LPCF to design a Special School system which has the facilities and resources, through £40 million capital investment, to meet the individual needs of all pupils in their local community. All needs provision does not equate to generalised provision; it means that schools will have a greater bank of resources and personnel equipped to educate a wider range of pupils with SEND. Individuality and the very specific needs of pupils are catered for within the county's existing All Needs schools and this will be central to the proposed model.

Petitioners argue that All Needs schools cannot meet the needs of pupils with Autism. At present there are 418 pupils with a primary need of Autism educated in Special Schools; 95 pupils attend Gosberton House Academy therefore 323 pupils with a primary need of Autism are educated in the county's other Special Schools. Pupils with Autism are already being educated in Lincolnshire Special Schools, having their individual needs met alongside pupils with other needs and disabilities.

- **"The belief that there is a £5 million deficit which schools will be expected to fund themselves"**. The government has provided revenue and capital funding to support Local Authorities to make capital investment in provision for pupils with SEND, which with earmarked capital funding within the Council's capital grants and academies also accessing capital grant funding for improvements it will enable the strategy to be fulfilled. Community Inclusive Trust to date has been successful in obtaining Condition Improvement Funding (CIF) for three of their academies to support the implementation of this strategy. Schools will not be expected to fund the proposed development of their premises as this will be funded by the allocated capital investment program, though opportunities to access CIF will be encouraged and supported.

Revenue funding of £2m has been earmarked to support the implementation of this strategy from the Dedicated Schools Grant underspend following Schools Forum support – this is to support training, start-up costs, transitional support etc. Further financial modelling work will be undertaken with revised funding requirements discussed with Schools Forum upon the work streams reviews being concluded.

The Special Schools funding formula will provide funding levels to meet the educational needs of pupils, and the formula is responsive to the changing landscape of pupil's needs and school characteristics.

- **"Gosberton House Academy should be able to retain its NAS Accreditation if it agrees to move to all needs"**. In every discussion with Special School leaders, LCC has recognised the excellent standard of education provided to pupils with SEND by all of Lincolnshire's Special Schools. LCC is committed to supporting Gosberton House Academy to retain its NAS accreditation and will also support all Special Schools to achieve this standard, as part of the planned workforce development strategy.
- **"In order to move to all needs provision; the school would require a separate block to educate pupils with severe learning difficulties and physical disabilities"**. Throughout the consultation LCC has informed all parent/carers that the allocated £40 million capital investment program will provide additional facilities in order for all schools to be able to meet a wider range of needs. This will include additional facilities and resources at Gosberton House Academy, specifically to meet the needs of pupils with PD and PMLD. However, the capital investment program will not support the segregation and isolation of pupils with differing needs and will work with each school individually to ensure the enhanced facilities will be in place to meet the individual needs of all pupils.

- **Expansion of age to 14 years.** This option has been considered by Special School Leaders and Gosberton House Academy but current demand does not indicate a specific need to extend the age range of this academy. In addition, the SEND vision for Lincolnshire is for pupils to be able to access their education as close to home as possible and extending the age range of Gosberton House Academy would have little impact on achieving this vision.
- **"Pupils with all needs and disabilities would be taught in the same classroom".** This has never been cited as part of the strategy. Schools which currently meet All Need do so by teaching pupils in classes with similar needs and encouraging integration at different times during the school day.

Whilst the strength of feeling presented in this petition must be acknowledged, it is important to recognise that its opposition relates only to the changes proposed for one school. Of the 14 Special Schools involved in the strategy, the opposition petition addresses only the proposals for Gosberton House Academy.

The "Help all special need's children in Lincolnshire by supporting the new SEND proposal" petition was signed by 217 people from the following locations:

- 40% Lincolnshire residents.
- 60% UK residents (location not always specified).

This petition was raised as a forum for parent/carers to log their support for the strategy, in response to the challenges witnessed at the LPCF consultation event in Spalding.

Parliamentary Correspondence

Correspondence regarding the proposed strategy has been received by either LCC or Special School Leaders from four MP's:

- Mr John Hayes MP for South Holland and The Deepings attended the Spalding LPCF consultation event to express his opposition to the proposed changes to Gosberton House Academy and the perceived SEND transport budget reduction. He also communicated his opposition via letter to Cllr Mrs Patricia Bradwell, who has addressed his concerns.
- Edward Leigh MP for Gainsborough and Horncastle wrote to Richard Wills, Interim Chief Executive, to express his support for John Hayes MP.
- Karen Lee MP for Lincoln wrote to Cllr Bradwell, on behalf of one of her constituents to raise concerns about All Needs provision in Lincoln and the lack of Autism specific provision.

10. Conclusion

The Building Communities of Specialist Provision Strategy has undergone public scrutiny in an extensive and thorough consultation process, which provided all interested parties with ample opportunity to express their support or opposition. The

consultation process has been highly emotive for some parties and the prospect of significant change for one school has been vehemently resisted.

Contributions to the consultation have been large in number, across the wide range of opportunities, with 667 responses to surveys, 236 people attending the consultation events and 25 respondents submitting comments and additional questions via email.

All consultation events have been informative and generated valuable and insightful discussions. As can be seen from the comprehensive summary of each event, discussion around the strategy and proposed changes for each school have been facilitated, with many parent/carers and school staff seeking reassurance over some specific issues and many key themes emerging. These key themes and the LA's responses to frequently asked questions have been addressed in the Public Consultation Feedback document and include:

- How did the LA/School propose to ensure all pupils would have their needs fully met within an all needs setting?
- Reassurances that the strategy did not support the blanket return of pupils to mainstream school.
- Reassurances that the LA was fully committed to ensuring that no pupil would be forced to change schools.
- Considerable interest in how the satellite provision would be developed.
- What are the funding arrangements for the proposals and would the allocated amount be sufficient?
- When the strategy was going to be implemented and what would the capital investment programme bring to individual schools?
- Reassurance that there would not be any changes to the transport policy and that those who currently receive transport would continue to do so.
- Arrangements for the proposed free school in Lincoln.
- How was the health offer for each school going to improve under the proposals?
- Reassurance that parental preference would not diminish.

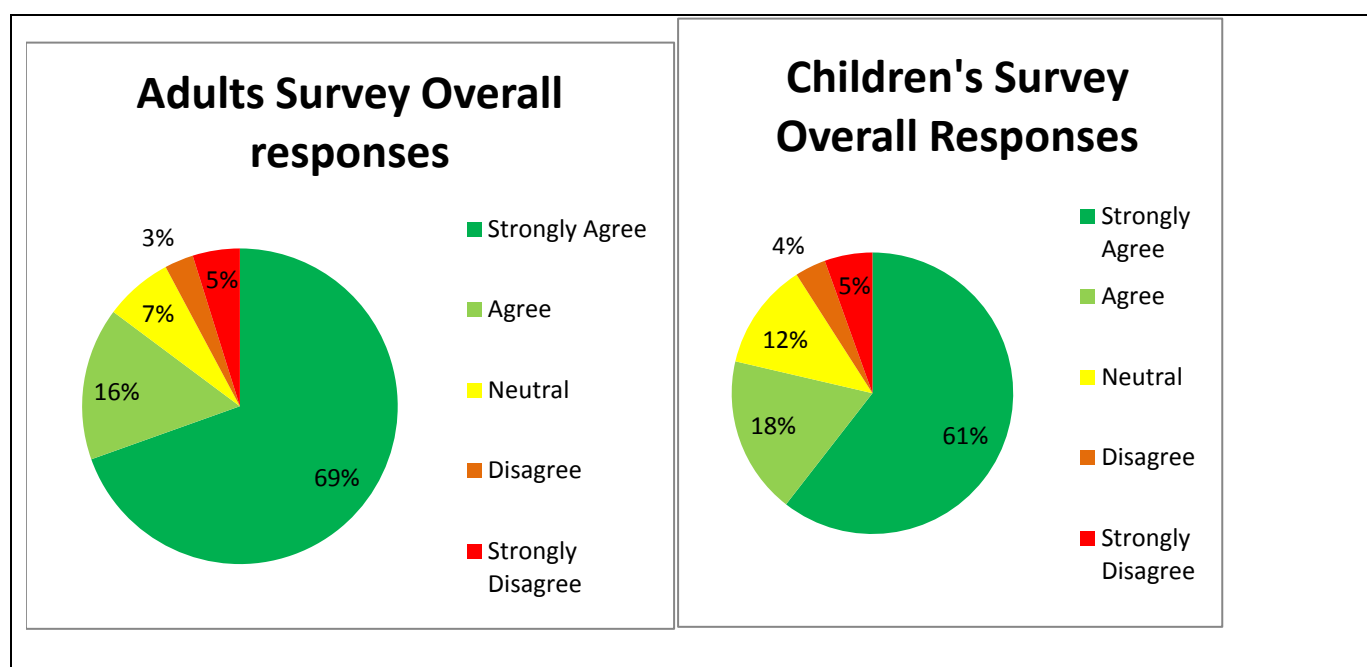
The majority of the consultation events provided an opportunity to raise concerns, dispel myths and for many parents and staff the opportunity to express their support for the strategy. However, two school consultation events and 3 other consultation events presented significant opposition to the strategy and the proposed changes for two schools.

Those in attendance at the Gosberton House Academy consultation event and the subsequent events held by LPCF at Spalding and the Boston and Sleaford LCC events, saw a core group of interested parties strongly opposed to the strategy. Parent/Carers from Gosberton House Academy, in attendance at these events and subsequently through email communication, expressed significant opposition to the proposed changes to their school and strongly objected to changing from an Autism specialist primary school to an all needs primary school.

Those in attendance at the St Francis School consultation event expressed their concerns, whilst recognising the need for change to the current school system. Their concerns related to the provision of all needs and questioned if this was a safe and appropriate environment for pupils with physical disabilities and complex medical needs. Both the Executive Head Teacher and Governors remain committed to the strategy and provided reassurance to those in attendance that the school could effectively meet all needs with the proposed capital investment programme.

Throughout the consultation period, the strategy has received overwhelming levels of support, evidenced through the survey data and feedback from some consultation events. Contributions to the survey have been generally very positive with some additional comments providing an excellent insight into the family lives of children and young people with SEND.

Analysis of the surveys is outlined below, it indicates that between 79% and 85% of respondents agree or agree strongly with the key messages in the strategy. Only 8% - 9% overall disagree or strongly disagree with the key messages within the strategy.



Overall, the survey has indicated that there is considerable support for the proposed strategy, with all key strategic messages being supported by between 61% and 96% of respondents. The only statement which was not supported by the majority was where parents were asked to identify if they would consider moving their child to a nearer school – this was met with significant opposition. However, as the proposed strategy does not require any pupil to move school against their wish, this should not be a concern if the strategy is adopted.

Recognising that the analysis presented in this report provides a more detailed picture of support and opposition for each key message and that support varies for each statement, it is clear that significantly more people are in support of the proposed strategy than are against it. Also, accepting that there has been a small amount of challenge raised regarding the survey, LCC does not accept that the

alleged bias would alter the overall outcome of the survey and is committed to ensuring the strategic vision for Lincolnshire reflects the opinions of the majority of people taking part. In addition, considerable regard has been given to the comments provided in the surveys text boxes to ensure the decision makers have given due regard to the all of the issues raised and presented.

Where the survey did present concerns and challenges, they related mostly to the proposed changes to all needs provision. Strong opposition was presented through the survey comments, by a small number of respondents, that changing an Autism specialist school to an all needs provider would significantly diminish the standard of education its pupils receive. This position has been represented throughout this report. It is also important to ensure that the position of those whose education would be significantly enhanced by the proposals should be considered and a larger number of comments have reiterated this position.

Contributions to the consultation via the SEND mailbox have been primarily from parties opposing the changes to Gosberton House Academy. As emails provide an opportunity for a direct and personal dialogue, this method of communication has been favoured by parties opposing the proposals. In addition to the communication direct to the mailbox, a number of Elected Members and Senior LA Officers have been contacted directly by these same parties opposing the changes to type of need catered for, where the school currently provides a specialism. All respondents have received direct responses from either the SEND Project Office or the recipient of the communication outlining LCC's position. In addition to the emails received opposing the strategy, 4 emails were received in support of the proposals to improve links between mainstream and specials school.

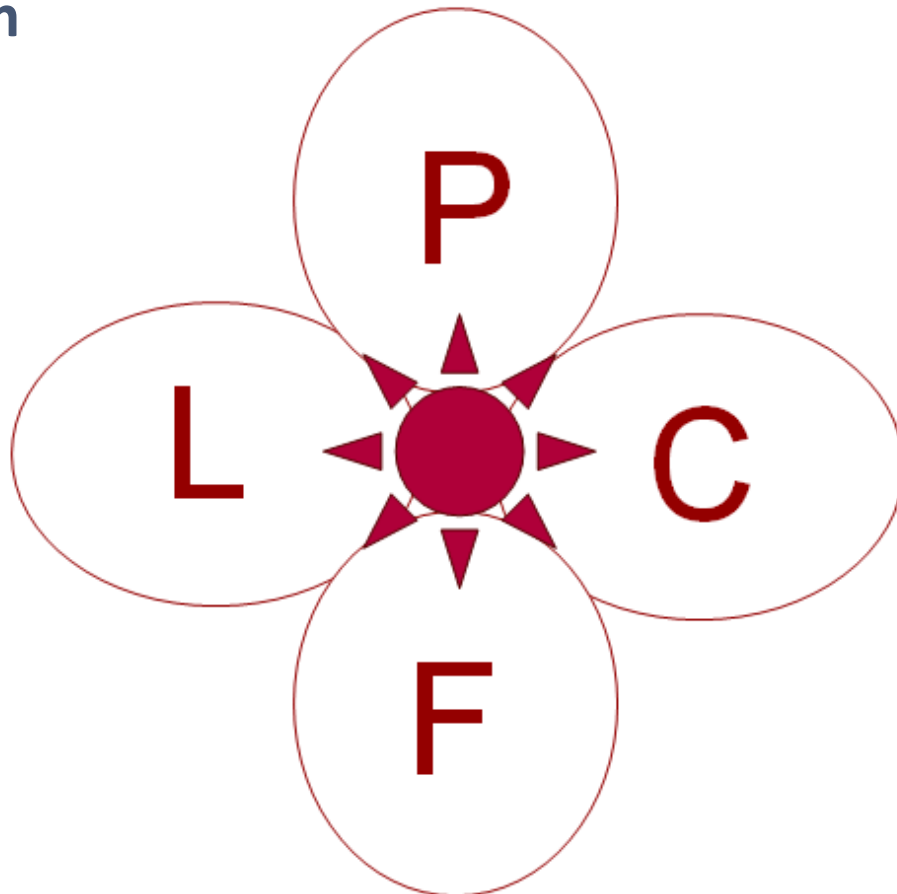
The strategy has been presented to other interested parties throughout the consultation period including health commissioners and providers, education leaders and trade union representatives who have all given their support to the proposed strategy. As identified in the report, valuable discussions have taken place with these parties but they are fully in support of the vision for SEND provision in Lincolnshire.

It is imperative that all future decisions for pupils with SEND in Lincolnshire are taken based on the needs of the majority. This strategy has been supported throughout the consultation process by a large proportion of parents, carers and interested parties who believe the proposals will create a sustainable Special School system to meet the individual needs of pupils with SEND across the county. However, it is equally as important to acknowledge the strength of opposition to the changes to Gosberton House Academy and, to a lesser extent, St Francis Special School. Decision makers from both the LA and DfE will give fair consideration to the impact of the strategy as an improvement to the whole Special School system. The capital investment program which accompanies this strategy has been welcomed by all Special School Leaders.

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2018

Lincolnshire
Parent
Carer
Forum



PARENT CARERS' FEEDBACK

ON

**Building Communities of Specialist Provision
for Children and Young People with Special
Educational Needs and Disabilities in
Lincolnshire**

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Introduction

As Lincolnshire's Parent Carer Forum we are specifically tasked, under the Special Educational Needs and Disability Code of Practice (2015), with working alongside the Local Authority and Health to ensure that the services they plan, commission, deliver and monitor meet the needs of children.

The Local Authority invited LPCF to be involved from the start of the project. Without the forums' participation in this project, the Project Board would not have heard the voice of parents and carers in the way that it did during the development of the proposals.

With nearly 2000 parents on our membership, we are able to represent families of children with a diverse range of Special Educational Needs (SEN) and disabilities and we have taken care in ensuring that all types of disability and needs have been taken into consideration.

Our participation in this project has enabled LPCF to ensure that parents and their children were at the heart of the strategy and that we could ensure that our expertise in listening to and representing parents' views could be utilised to inform the development of the strategies proposed.

Involvement in the project has taken a huge commitment from LPCF volunteers, who have given their time for free, to ensure that parents' around the county have their views represented and to also enable them to participate fully in the five additional LPCF consultations.

The transparent collaboration during the development of the proposed strategy has given LPCF confidence that the parents views they have gathered, have been taken on board and utilised from the beginning.

LPCF was supportive of the proposed strategy going to public consultation. We were able to support the proposals being consulted on because the Local Authority and Special School Head Teachers have taken into account our feedback, constructive challenge and the contribution that we have been able to make based on the extensive feedback we receive from our members throughout Lincolnshire.

Message from LPCF Team

We are delighted that parent carers felt passionate about attending our consultations and sharing their views with us. We cannot express enough how valuable these views are in ensuring that we are representative of parents of children with a diverse range of disabilities and SEN, who are members of our network.

We have given our parents a chance to feedback their views to us by offering five independent consultations around the county in Horncastle, Lincoln, Grantham and Spalding (2). Not only that, but to further support the value of parent carers' feedback, we have recorded all the responses that were collated at the meetings. In addition, further communication was received from parents by email, through our website's 'Your Say' page and through face to face events such as the coffee mornings and meetings.

The meetings were hosted by Lincolnshire Parent Carer Forum and Lincolnshire County Council representatives were invited as guests to present the strategy and answer questions about the proposals. We were also fortunate enough to have four heads of Special Schools attend our consultations, who listened to parents and were able to give their own views about the proposals and answer any specific questions about the strategy.

Over fifty people attended to have their say on the proposals as well as to share their personal experiences and views. LPCF also gave parents the chance to book an appointment to speak to the Local Authority on a one to one basis about their individual issues. This opportunity was taken up by parents who were grateful to have their individual issues addressed by the Local Authority on a face to face basis.

Feedback from each consultation has been kept separate as there was a distinctive difference in the ethos of the questions posed by parents at each event. Whilst concerns over the effect the strategy would have on their own children was voiced by many parents, Spalding's meeting brought up particular questions about the "All Needs" designation of Gosberton House Academy.

Additional feedback from parents who were not able to attend a meeting is also recorded in this document.

As well as hosting our own Consultations to inform the process, our team of volunteers have attended all of the consultations at each Special School and also the three public consultations held by Lincolnshire County Council (LCC). Our volunteers have been committed to ensuring that the views of parents are at the heart of this project and have given their time willingly to help inform the process.

This document will be given to the project board in a bid to inform the consultation process.

We hope you find this report valuable reading and would like to thank all of you who participated, Lincolnshire County Council staff and the Heads of Special Schools for supporting the involvement of parents in the project.

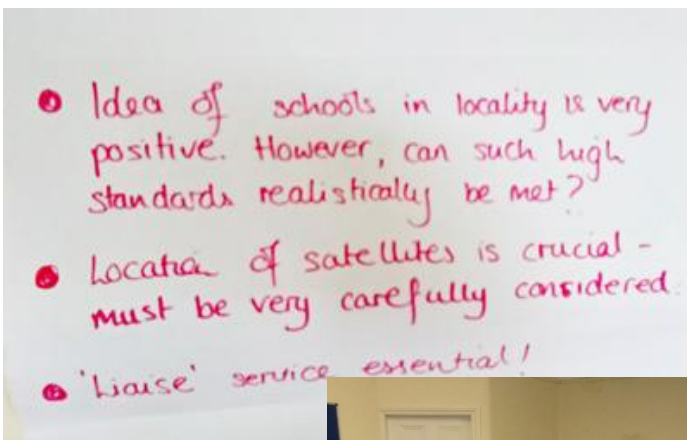
With best wishes,

Coralie Cross & LPCF Team

This is the unadulterated feedback collected from parents:-

Meeting One: Horncastle 11am-1pm

- ❖ Satellite sites on mainstream school sites, has this been mapped?
- ❖ South of the county, close to the Lincolnshire/Peterborough border (Crowland). Peterborough is nearer for schools. Is there still a choice for parents to choose schools?
- ❖ Some time ago, there was some funding for a satellite unit which was going to be placed on the Priory Witham Academy site. Nothing happened with this. This did not materialise and nothing happened. This is not how we want the units to be run.
- ❖ What about SEMH schools?
- ❖ Is any of this going to affect the funding for schools transport?
- ❖ What about transport for pupils aged 16-19?
- ❖ The bursary at schools for 16-19 transport is not applicable to parents with pupils accessing education in independent settings. This disadvantages parents with low incomes. Cambridgeshire pay for this, Lincolnshire don't.
- ❖ Stamford – what is the closest school, is it Grantham? Mainstream said no to taking my son. Who makes the decision on placing in the satellite sites?
- ❖ Transport already in place. Entitlement already granted. At the annual review thoughts around nearer schools would be raised and the question asked. The transport policy will only fund a pupil to the nearest school. What choice do parents have?



How do you ensure access to health?
(OT, physio, SALT, ed psychs, CAMHS)
These are needed school nurses
within special schools, especially schools with such a 'broad' remit.

Cross-boundary CCGs - funding

Community links in localities - short breaks.

- Staff training, from outset and ongoing
- From mainstream perspective, they're already overstretched
- Don't feel autism fits this model - spikey profile - but how do teachers possibly cope with such diverse needs and meet those needs effectively?
- Does reality live up to dream?

Meeting Two: Lincoln 11am-1pm

- ❖ I have a child in a very small village mainstream. There are challenges from the mainstream side. If this is going to happen then involving mainstream schools will be challenging.
- ❖ Mainstream schools need to communicate better with each other about challenges and issues but successes also.
- ❖ People need to be open- minded and not blinkered in their thoughts and views.
- ❖ The SENCo training should also include training on disabilities (Downs etc). This would help to develop knowledge and skills before school settings take on pupils.
- ❖ It was noted that Teaching Assistants (TA's) should be able to share expertise and practice the same as the SENCos do. Do they need a working group as well as the SENCo's?
- ❖ This proposed strategy and model will get challenges from parents and headteachers. It is understood that people don't like change.
- ❖ Why aren't parents engaging?
- ❖ Parents want to have the flexibility of mainstream settings and not to lose the special school places that they have had to fight for.
- ❖ Is it county wide?
- ❖ Units – is it going backwards?
- ❖ Must meet the needs of the child holistically.

Meeting Three: Grantham 11am-1pm

This meeting was cancelled due to lack of attendees.

The parent that had booked was encouraged to feedback via the questionnaire and was given the opportunity to speak to someone from the Local Authority if they so wished.

Meeting Four: Spalding 11am-1pm

- ❖ Who decides which school is the best place?
- ❖ In-house training or specialist training? Buying in training and therapies? The NHS also faces challenges to provide services for pupils with SEND.
- ❖ Going forward are there going to be adaptations of mainstream school premises to accommodate needs?
- ❖ Where and when do you think that mainstream school teachers will have the time to look at pupils with SEND? How will this be done?
- ❖ £5m shortfall in funding. Are you expecting schools, either the special or mainstream schools to pick up this difference?
- ❖ Satellite Units – this name is misleading.
- ❖ All in agreement that children need specialist education. Why are we diluting it?
- ❖ Transport – will it be provided if I refuse nearest school?
- ❖ Autism is not a one size fits all disability.
- ❖ Need more mainstream school staff effectively trained to educate and care for the needs of children with SEND.
- ❖ More access to specialists to advise and support teachers, parents and children in schools.
- ❖ Better processes for identifying SEND within schools, more SENCos and more disability aware staff.
- ❖ More specialists to work in schools and advise and work with teachers, parents and children.
- ❖ More transparency and less ambiguity in processes for SEND identification & support.
- ❖ More open, active promotion about services and support to parents within Lincolnshire.
- ❖ Better more effective working of services across the board. Teachers, doctors, health services, parents, psych services, CAMHS, occupational therapists!!
- ❖ All needs into Gosberton will disrupt.
- ❖ Accreditation is at Gosberton.
- ❖ If you can't meet their needs, why not? Why is there no provision in place for them?
- ❖ Until today I didn't realise the decision to make Gosberton House "all needs" was a decision made by the school themselves (or the Trustees) – where were they?

- ❖ Why build another school in the Lincoln area when you could build one in Sleaford providing for lots of local villages?
- ❖ It was nice to see Head Teachers from South Holland and South Kesteven represented at the meeting to confirm their support for the proposal, sadly there was a notable absence of the Head Teacher of Gosberton House School to indicate their position.
- ❖ If you change Gosberton House Academy that's then not meeting the needs for those kids already there.
- ❖ Mainstream struggle now – influx of SEN.
- ❖ Improvement in EHC process required.
- ❖ More Special School places needed.
- ❖ Early intervention is critical in child's life long- term.
- ❖ All needs at Gosberton House will reduce "Autism Specialist" places.
- ❖ I feel that this meeting was pointless. I feel that you haven't explained everything so very pointless.
- ❖ Very confused – I don't think that changes need to be made at all. Yes in fairness extend the Special Schools that's fine to some extent but changing to all needs to everyone is too much.
- ❖ No more cuts to transport, if anything improve training to Personal Assistants (PA's) on the transport and Autism is on the rise and should be addressed, not drowning out the schools for Autism to all needs. Not every disability is the same. If anything more funding to improve the Special Schools to get the children out of the mainstreams who don't get all the funding needed and the choice to move. Not every child suits mainstream. Class sizes are too demanding, noise if they have anxiety and how they follow work.
- ❖ Battle to get Special School place is isolating.
- ❖ After the LPCF Representatives had dealt with the hostile environment I learnt a lot about the proposed changes. One lady had to leave, due to being distressed by the hostile and confrontational attitude of some parents who were not even prepared to listen to the presentation.
I personally think the strategy has some very good points e.g more school places, less travelling times for children, more funding into the terrible school buildings to make them fit for purpose and at last some investment into staff training.
I understand parents are frightened of change but I think that some changes are for the best and it has to be looked upon as a big picture and not be governed by the views of parents of one school.
- ❖ Good idea to have more autistic schools.
- ❖ No respite for ventilated – go to Leicester Hospice 40-50 miles.

- ❖ Really happy in mainstream (Reception) – mainstream support continue – more support needed.
- ❖ Educational Psychologists only seeing children with an Education, Health & Care Plan (EHCP).
- ❖ Get it right at the beginning i.e. Pre-school.
- ❖ Need a teacher for the hearing impaired.
- ❖ Gosberton keep the same or expand and build another school.
- ❖ Can't see all needs working with Autism.
- ❖ Why do people think that Autism is MORE special than other special needs? All children need to have their needs met and if the heads of Special Schools say they can do it – why not let them. They will be accountable later in the implementation stage if it goes ahead.
- ❖ What's going to happen after 11 – no Specialist Autism provision then?
- ❖ More schools needed but smaller schools.
- ❖ Don't want to go back to mainstream with all teachers who don't know about Autism. Keep it specialised.
- ❖ Convert an existing building – Sleaford area – satellites may work.
- ❖ Will more kids be home schooled? This may affect the family unit.
- ❖ Good idea – stay at Special School but access i.e. Science GCSE is a good idea.
- ❖ Can we be clear - Gosberton House Special School is not the only school that deals with children with Autism. All Special Schools, Primary schools and Secondary schools cater for children with Autism, almost without exception.
- ❖ Why change something if it is working?
- ❖ Why was Mr Hayes invited by parents unless he was representing all parents and not just a few?
- ❖ I was very saddened by the rude, haranguing, bullying tactics of a small group of the audience when some people were trying to listen. Very disappointed with these parents.
- ❖ Child in a mainstream primary. Happy that the school is meeting needs and does not want child to go somewhere like Gosberton House but continue in mainstream into secondary (currently in reception). I am looking forward to the future. The only drawback was lack of British Sign Language (BSL) knowledge of staff, no teacher of the deaf going into the school as child no longer wears hearing aids, but uses sign supported English, BSL to communicate. Lack of assisted communication aids in school. Schools not informing them about the consultation.
- ❖ Concerned about parents who are too shy to ask for support.

- ❖ Parent asked why are EHC plans being rejected at pre-school age, when it is supposed to be from birth. This affects children as the Educational Psychologist only becomes involved with children with an EHC plan.
- ❖ Gosberton School have children who have co-morbidities not just Autism Spectrum Disorder (ASD), so they are not just an Autism school, they meet other needs already.
- ❖ I asked some of the parents on my table if they had been to any coffee mornings or events (no not heard of LPCF till recently) but LPCF has been going 10 years, why have Gosberton School or Early Bird trainers not mentioned LPCF?
- ❖ So say Gosberton stayed as it is, children grow up and are going to move to one of the all needs schools, so why not start mixing your children now with children with other needs, so they recognise difference from an early age. Just some of my own conclusions.
- ❖ Why are the LA proposing this?
- ❖ Training and workforce development, where is the money coming from to fund this?
- ❖ Messages from certain schools should have been clearer.

Meeting Five -Spalding 6.30pm-8.30pm

This meeting was cancelled due to lack of attendees.

Written correspondence

Email to LPCF received as follows :

"My name is x and I attended the meeting this morning at Spalding. I left the meeting early as I felt very uncomfortable with the way it was going and the confrontational feeling. I just wanted to thank you and your volunteers. A lady (I'm afraid I've forgotten her name) followed me and got me a drink (I'd had a few tears) and made sure she wrote down my viewpoint as she felt it was important all voices were heard."

"I'm joining LPCF this evening so that I'm more aware of what's going on - but I just wanted to say thank you to you all for the professional manner in which you conducted yourself and the support you provided me."

Feedback on Facebook

We should be all in this together, it's not rocket science what's needed, was sad to see you guys had already agreed to this.

Common Themes

For ease the most common themes have been grouped together:-

- ✓ Will children be forced to change schools?
- ✓ School Transport
 - Is it a money saving exercise?
 - Will my child's current transport arrangements be honoured by LCC?
 - Concerns over length and time of taxi journeys, although a few exceptions were noted (child/parent liked the journey).
- ✓ Satellite provision
 - Are mainstreams supporting the proposals?
 - Access.
 - More flexible opportunity.
 - Maybe many challenges for mainstream schools.
 - Sharing expertise – good news.
 - Confusion about "units".
- ✓ Staff training
 - Will staff in mainstream be adequately trained?
 - Will mainstream schools be adequately resourced?
- ✓ All needs designation change- concerns by some about how this can be achieved.

Dilution of provision

- Concerns specifically from parents at Gosberton House School.
 - Myths and rumours with regard to Gosberton House School.
 - Whether Gosberton House is actively supporting the proposals.
 - What happens if one school decides not to support the proposals?
- ✓ Health offer – engagement with health?
 - ✓ Funding – is it enough?
 - ✓ What about SEMH schools?
 - ✓ Why is Sleaford not being considered for the new school site?
 - ✓ Transitions – some parents were happy to have no transitions between Primary/Secondary; however, some were concerned that no transition meant children did not experience change.

How LPCF engaged with parents and enabled their views to inform the proposals.

- Case studies were provided by LPCF to inform discussions during the development phase, looking at issues such as travelling times for children, parental anxieties surrounding separation when child attends out of county placements and the battle that parents experience on a daily basis.
- Evidence from our “Parents voice reports” was also used to inform the process. These views are gathered from parents around the county about the services they use and are their unadulterated feedback. Parents are encouraged to participate in giving LPCF their views at every coffee morning, workshop and event and through the “Your Say” page of our website. We publish the reports every three months and they are circulated to the Local Authority and Health services for their information. We also feedback the views of parents on our forum to the Department for Education through the DFE SEND survey.
- Findings from LPCF’s Transport Consultation report (2015) and our LPCF SEND survey (2016) also informed the process.
- Eight pages of our website have been dedicated to the Proposed Strategy as it was prioritised by our forum.

How LPCF were involved in the development of the proposed strategy.

- During the development of this project our volunteers have attended many meetings with the Local Authority and Heads of Special Schools.
- LPCF team had input into the narrative document including two of our representatives being filmed for inclusion in the document.
- Input into the two page bulletin of the summary to ensure stakeholders were informed of the main bullet points in an easy to read format.
- LPCF had input into the Frequently Asked Question sheet so that parents could be informed prior to the consultations.
- Input into the design and wording of the Questionnaire to make it as easy to read as possible.
- LPCF have regularly emailed all parents and other stakeholders including professionals, support groups, voluntary organisations, schools and SENCOs to keep them informed of the documentation, website pages and access to all consultations.
- We regularly used Facebook and Twitter to inform parents about the proposals.
- Our volunteers informed parents of the opportunities provided for them to engage at every coffee morning and event during the consultation period. If they were not able to attend in person they were advised on how to participate in giving their views.
- Our own survey has increased our membership and all new members have been written to and invited to give their views on the proposals.

Appendix A: Steps LPCF have taken to ensure that Parents are Informed and Consulted.



Lincolnshire Parent Carer Forum

LPCF have dedicated eight pages of our website to the Strategy e.g.

Lincolnshire Parent Carer Forum
 LPCF, PO Box 1183, Spalding, PE11 9EE
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 admin@lincspcf.org.uk
 Tel 07925 232 466

[LPCF Home](#) | [Strategy Home](#) | [Strategy Summary](#) | [Strategy FAQ](#) | [Contacts](#)
[Consultation LPCF](#) | [Consultation Special Schools](#) | [Consultation Public \(LCC\)](#)

Building Communities of Specialist Provision for Children and Young People with Special Educational Needs and Disabilities in Lincolnshire

Big News! - Please read on for more information:-

Strategy Summary (key points)

Lincolnshire County Council's Children's Services has been working with all special school head teachers and Lincolnshire Parent Carer Forum to develop a new strategy for special education in Lincolnshire. The Building Communities of Specialist Provision Strategy is the result of this work and we believe it will address many of the challenges pupils with special educational needs and disabilities (SEND) and their families face when trying to access the right education, in the right place at the right time.

For parents and carers, we recognise some of the challenges you may have had to deal with.

- Your nearest special school may not be able to meet your child's specific needs, so they have to travel long distances to get to a school that can meet their need.
- Your nearest special school may not have space to accept your child, so they have to travel long distances to get to a school that has a space.
- Your nearest special school may not have the resources to meet your child's needs, so they have to travel long distances to get to a school that can give the right support.
- Your child may have specific, complex needs and because the special schools in Lincolnshire cannot meet their needs, they are being educated out of county. This can mean long periods living away from home or long daily journeys.
- You may have wanted your child to remain in mainstream school but did not feel there was adequate support and training for staff

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Building Communities of Specialist Provision for Children and Young People with Special Educational Needs and Disabilities in Lincolnshire

IMPORTANT Message from LPCF

The following strategy proposes that children with SEND receive *"the right education, in the right place at the right time to enable them to achieve their full potential"*.

As Lincolnshire's Parent Carer Forum we were invited by the Local Authority and heads of Special schools to work in partnership in the development of the strategy.

We have been working closely with all partners, from the beginning to ensure that the challenges families face and the issues that they may have are taken into consideration in the development of this proposed strategy.

Our involvement enabled LPCF to ensure that parents and their children were at the heart of the strategy and that we could ensure that our expertise in listening to and representing parents views could be utilised to inform the process

We are now asking **you** to give us your views and tell us what **you** think to the proposed changes.

Statistics - Increase in engagement of LPCF members

<u>LPCF Website Statistics</u>	Average Jan-Dec 17 (For comparison)	Jan-18	Feb-18
Unique Visitors in month	642	1715	1180
Visits	1089	2393	1666
Page Views	5942	12007	8465

Our massive increase has two key drivers – the Special School Review and LPCF Survey.

We cannot separate the impact of each driver but the enormous increase would seem to evidence that parents were engaging actively with us in Jan-Feb 18.

<u>LPCF Website Statistics</u>	Jan-18	Feb-18
Visits to Special Schools Review Index Page	472	367
Visits to LCPF Consultation Page	115	45
Visits to LCPF E-Booking	141	127
Special Schools Review Document Visits		
Summary	90	127
FAQ	71	72

This table shows defined visits to the key Special School Review pages of our website.

It does show that good numbers visited the key pages but a much smaller number then went on to read the Summary and the FAQ pages.

Interestingly, in February, people visited less but were more inclined to read the Summary document more.

Reassurance to parents

Lincolnshire Parent Carer Forum have been very reassured that included in the proposed strategy is the following statement:-

"LCC and all other stakeholders can confidently reassure parents and all concerned parties that, at no point in the implementation of this strategy, will any pupil be expected or forced to change school against their wishes. All opportunities to move to a school closer to home will be on a voluntary basis and transition will only occur as part of an agreed and fully supported process, at a time in their education that is least likely to cause upset. If this strategy is agreed, it is an opportunity for pupils and families, not a requirement."

LPCF are aware that some parents have misinterpreted and misunderstood our role in this process.

We would like to clarify that LPCF **were not the decision makers** in this process.

LPCF were party to a transparent process where the proposed models of provision were agreed by **ALL the Heads of the Special Schools** without the Local Authorities presence at the time of the decision.

Thanks

LPCF would like to thank the Local Authority, Heads of Special Schools and stakeholders involved in the co-development of the strategy for giving Lincolnshire's Parent Carer Forum the opportunity to co-produce these proposals.

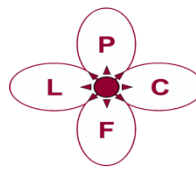
It is imperative that LPCF remain active partners in reviewing how the system is working and providing constructive challenge as active partners to the local authority and health services as developments continue.

Working together with parent carers from the outset and giving them an equal voice may be challenging for services as they are held to account, made to look at issues from different perspectives and asked to consider working in different ways.

However, working in co-production also helps parent carers to better understand the constraints and limitations placed on services, particularly around the budgetary and legislative requirements for provision of services.

In our experience, co-production takes a very real commitment to make it happen and we believe that the Local Authority and the Heads of the Special Schools in this process have made that commitment and need to be recognised for their forward thinking approaches.

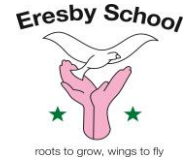
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Building Communities of Specialist Provision: A Collaborative Strategy for Children and Young People with Special Educational Needs and Disabilities (SEND) in Lincolnshire



Public consultation feedback with responses to issues and questions raised during the Consultation Phase 8th January – 14th March 2018



Please Note: Questions, concerns and comments raised throughout the consultation have been 'themed'. Please be assured that all feedback has been considered in full and is being presented to decision makers.

The outcome of the on-line survey will be included in a published report to be presented to LCC's Children and Young People's Scrutiny Committee on the 20th April 2018.



No	Theme	Examples of Issues Raised	Response/Comment
1.	Consultation and decision making process	<p>Not a genuine consultation – decisions already made.</p> <p>Concern about the use of Likert scaling and perception that statements were biased.</p> <p>People have valued the number of consultation opportunities and different ways in which contributions could be made.</p> <p>Parents have not had a voice until the consultation period.</p>	<p>This was a genuine consultation and all feedback has been considered and is being included in reports to decision makers.</p> <p>The statements which the public were asked to scale using the Likert scaling method were not intended to have any bias; they were straightforward statements that linked directly to the proposals on which the consultation was based. The scaling allowed for respondents to vary their responses from a strongly disagreed position through to a strongly agreed one. The survey also provided free text boxes for respondents to provide comments. This has provided a rich source of information. The survey questions were developed in partnership with the Lincolnshire Parent Carer Forum to try to ensure that they were accessible to all.</p> <p>It is positive to hear that members of the public valued the range of ways in which they could contribute to the consultation.</p> <p>The Lincolnshire Parent Carer Forum has worked with the Special School Leaders and the County Council from the inception of the project; they represent parent carers across the county and were crucial to the development of the proposals which went out for public consultation. The consultation period was the opportunity to hear the views of parents, young people and other interested parties.</p>
2.	Proposed capital investment for special schools - funding allocation & feasibility of project	The council needs to save £22 million – how can it afford the investment in this project?	The £40 million finance for this project is capital funding and is not part of the overall council's efficiencies. In addition, the funding for schools is provided through a separate Dedicated Schools Grant and is again not part of the council's £22 million efficiencies.

What is the £40 million to be spent on and is it enough? The council has acknowledged a shortfall of £5 million.

There is no detail about what each Special School will receive in terms of investment.

The capital investment identified will be used to address the capacity, suitability and condition issues within the existing premises. Many of the Special Schools are neither big enough nor do they have appropriate space and facilities to meet the growing complexity of their pupils. The £40m will be utilised to expand some schools to accommodate the growing demand for special school places whilst others will see significant improvement to their current premises. For example, where a special school does not have the facilities to meet the needs of pupils with physical disabilities, this will be included in their building program, including track hoists, improved hygiene suites, medical facilities and ensuring access to a suitable hydrotherapy pool. Special School Leaders have also identified the importance of access to quiet/low arousal spaces and more sensory spaces which will be accommodated. These are just some of the areas that will be improved to ensure that all schools will be able to meet the individual needs of pupils in their local communities.

Based on the initial analysis completed, LCC firmly believes that the allocated budget will support the development plans discussed with each special school and the implementation of the special schools satellite pilot. However, as many of the Special Schools are academies they also have the opportunity to bid for Condition Improvement Funding.

Each school has been assessed by the council's Corporate Property Team. The assessment has taken into account the increased property requirements for each school in line with DfE published Building Bulletin 104 guidance and has given an early view on the potential investment needed overall. Detailed design work will commence to further inform the actual building requirements should the strategy be approved ensuring any building adaptations or additions

		Should there be a Special School in Sleaford?	<p>effectively enhance and support the learning environment.</p> <p>Sleaford was considered as a potential area for a new special school and pupil numbers mapped for a school in this area. However, School Leaders felt that, at this time, the potential number on roll would not support a proposal for a new school. The decision for a new Special School in Sleaford is being kept under review.</p>
3.	Proposed capital investment for special schools – development plans for schools	<p>Welcome the increased capacity that the capital investment will bring.</p> <p>No detail of intended capital programme including plans for deaf children.</p> <p>Concern that Special Schools are under-funded and therefore can't meet the needs of their pupils.</p>	<p>The capital investment for this project is significant and provides a unique opportunity to ensure that specialist provision in the county is fit for purpose to meet the needs of 21st century pupils.</p> <p>Please see response above regarding capital programme.</p> <p>The majority of children and young people with hearing impairment receive their education in Lincolnshire's mainstream or Special Schools and will continue to do so. However, there are a small number of young people who require specialist provision that Lincolnshire Special Schools are unable to replicate e.g. an environment in which communication is through British Sign Language. It is therefore recognised that some deaf children may still require specialist provision outside of the local area.</p> <p>Special School pupils are assessed to an agreed band and descriptor, which determines the level of funding for that pupil, including costs such as Teacher, Teaching Assistance and Midday Supervisor support. The funding formula is kept under review to ensure it meets the needs of the changing demographic of Lincolnshire Special Schools' pupils.</p> <p>The funding formula has been built up on a theoretical cost model via a zero-based budgetary approach using key cost drivers. Engagement takes place with Special Schools to ensure the formula continues to be fit for purpose. The</p>

		<p>Why is a new school being built in Lincoln when Queen's Park was closed?</p> <p>Special Schools that stand to gain will support the proposals.</p>	<p>Local Authority is assured that the funding levels meet the needs of its Special School pupils.</p> <p>The proposed new school in Lincoln will relieve the current pressures on St Christopher's School which is full to capacity. The closure of Queen's Park was at a time when the Local Authority's intention was to improve opportunities and facilities for children and young people with more complex needs and disabilities; this could not be facilitated in the Queen's Park premises which were not fit for purpose and could not be developed.</p> <p>Almost all of the Special Schools in Lincolnshire will benefit from the capital investment that this project brings but, more importantly, School Leaders believe that this approach will benefit young people with additional needs.</p>
<p>4.</p> <p>Page 147</p>	<p>Meeting all needs in one setting</p>	<p>Don't believe it will happen.</p> <p>Most Special Schools in the county are already meeting a wide range of needs and this is working.</p> <p>Concern that all needs could not be met in one setting.</p> <p>Concern that 'all needs' will dilute the standards in specialist schools.</p> <p>'All needs' suggests a 'one size fits all' approach.</p>	<p>If the proposals are accepted there is no reason why this project will not go ahead. School Leaders and the Local Authority are committed to maintaining momentum with the project.</p> <p>As the evidence demonstrates, Lincolnshire Special Schools are already meeting the needs of a far wider range of educational need and/or disability. School Leaders are confident that the proposed model is one that they can deliver.</p> <p>There is no intention to dilute the standards in Special Schools. Over recent years the schools have developed expertise to ensure that they have been able to meet the widening range of needs that they cater for. There is also an absolute commitment from the School Leaders to share expertise and best practice across all the schools so that the workforce is equipped to respond to children's needs. There is certainly no suggestion that one size fits all and Special Schools will continue to respond to the unique</p>

		Children with differing needs require different interventions.	needs of each pupil. As is currently the case, pupils will have, through their Education, Health and Care Plan, their unique needs clearly identified along with the interventions they require to support them.
5.	Meeting the specific needs of pupils with complex physical/medical needs in an all needs setting	<p>Concern that the specific needs of children with physical and medically complex disabilities are significantly different and require a completely different environment and learning support.</p> <p>Health and safety risks for less mobile young people who may not be able to move out of the way of others with challenging behaviour.</p> <p>Vulnerable pupils need to feel safe.</p>	<p>Please see response above.</p> <p>The unique needs of all pupils will continue to be paramount and the re-modelled schools will have the appropriate environments to ensure that children with physical and medically complex needs have their needs met. The levels of support they require to facilitate their learning will not change.</p> <p>There is no intention to simply put all pupils, irrespective of their needs, in the same classes. As is currently the case in schools catering for a wide range of needs, the placement of pupils in specific teaching groups is carefully considered. Their vulnerability and safety will continue to be a priority.</p>
	Meeting specific needs of pupils with Autism in an 'all needs' setting	<p>Need for low arousal, low stimulus environment.</p> <p>Need for specialist resources.</p> <p>Should be considering more specialist autism schools.</p> <p>Gosberton House should take pupils up to the age of 14 as there is a gap in provision.</p>	<p>The re-modelled schools will be designed to ensure that they have the appropriate spaces and resources to meet their needs. The School Leaders have been clear about what they require and the assessments undertaken by the council's Corporate Property team have taken all of this into account in the high level plans that have been developed.</p> <p>There is not the evidence to support the need for more specialist autism schools.</p> <p>School Leaders at Gosberton House have not requested, throughout the development of the proposed strategy, a change to the age range of the pupils they take. There is no gap in provision for this age group and most pupils leaving Gosberton House at eleven settle well into other Lincolnshire specialist or mainstream schools.</p>

7.	Transport Policy	Concern that children remaining in their existing school may no longer be entitled to transport.	No child will be expected to move from their current Special School unless this is what they and their family would like them to do. If the young person has a transport entitlement than this will continue.
8.	Proposed Satellite hubs and the commitment of mainstream schools	<p>Mainstream sector may not be interested in having specialist satellite hubs.</p> <p>The Hubs sound exciting.</p> <p>Concerns that mainstream don't understand the needs of children and young people with additional needs.</p> <p>Children and young people with additional needs can do so well in mainstream schools.</p> <p>Some parents do not want their children to go to a specialist school and welcome the support in the mainstream setting.</p> <p>Parents keen to consider this for their young people who they feel are ready to try/return to mainstream education.</p> <p>Seen as the 'right direction' but concerns that this isn't always right for pupils with ASD.</p>	<p>The Local Authority has already received a significant number of expressions of interest from mainstream schools that would be keen to have satellite hubs on their site. They too are excited about the potential to support children and young people with additional needs in this way.</p> <p>There are approximately 15,000 children and young people with Special Educational Needs Support or an Education, Health and Care Plan having their needs met in Lincolnshire's mainstream schools.</p> <p>This proposal acknowledges that there is still room to increase the expertise in the mainstream sector and the strategy offers some real opportunities to achieve this.</p> <p>It is the case that some parents do not want their children to go to a Special School and, if the child's needs can be supported in mainstream, they should be afforded the opportunity to remain in mainstream.</p> <p>The proposed Hubs provide an opportunity for young people to experience mainstream school with the support of specialist staff.</p> <p>There is divided opinion about where and how children with ASD should be educated. All views expressed through the consultation are being considered by the academies and schools and are being shared with decision-makers.</p>
9.	Workforce development	Not possible to upskill staff to the same level.	The Special School Leaders are confident that they will have an appropriate level of expertise in each of their

		<p>Too costly.</p> <p>Disbelief that all staff can be trained to teach children with complex Autism Spectrum Disorder (ASD).</p> <p>Where is the detail of the workforce development plan?</p> <p>Gosberton House should be a training centre for staff working with pupils with moderate to severe ASD.</p>	<p>schools. They are already meeting a growing range of needs and are experienced in developing the workforce to respond to the changing needs of the young people that they work with. Lincolnshire has a wealth of expertise across the sector and there is a commitment to ensure that best practice is shared.</p> <p>The Local Authority, with support from the Schools Forum in October 2017, has provisionally earmarked £2m in revenue funding from the Dedicated Schools Grant (DSG) underspend to support costs for training, start-up and transitional support.</p> <p>All Special Schools in the scope of the proposals already meet the needs of children with complex ASD.</p> <p>Following the outcome of the consultation the detail of the workforce development plan will be devised. The project will require up to 5 years to implement and workforce planning will be incorporated into the overall timeline for the development.</p> <p>Gosberton House leaders have given a commitment, along with other Special Schools that also have expertise in ASD, to support the school workforce.</p>
10.	Health offer and provision of therapy services	<p>Concerns expressed about a lack of Speech and Language Therapy provision in the county.</p> <p>Concern expressed that Paediatricians have patient lists that are unmanageable.</p> <p>Concern at lack of Sensory Integration Therapy in the county.</p>	<p>There is a dedicated work stream considering the health offer for children and young people with Special Educational Needs and Disabilities. There is a commitment from the Clinical Commissioning Groups and health providers in Lincolnshire to develop an integrated system that appropriately supports pupils with additional needs.</p> <p>There is a separate multi-agency strategic review of the Autism Pathway and this includes consideration of Sensory Integration Therapy.</p>

Page 151	<p>11. Out of County provision</p>	<p>Concern that young people settled in out of county specialist provision will have to give up their place.</p> <p>Concern that parents will no longer have the choice of out of county specialist provision.</p> <p>Parents reporting distress at the loss they feel when their child has to be placed in out of county provision because no local school could meet their child's needs.</p> <p>Children and young people should not have to live away from home to receive an appropriate education.</p>	<p>No young person in out of county provision will have to give up their place.</p> <p>Children and young people are placed in out of county provision because local Special Schools are unable to meet their needs.</p> <p>Through the proposed strategy more of their needs could be met in local Special Schools and therefore there should be no requirement for children to go into out of county provision. However, if a child had such specific needs that only out of area provision could meet them then the process for placement will continue as it is currently.</p> <p>The Local Authority, Parent Carer Forum and Special School Leaders recognised that many parents do not want their young people to have to live away from home in order to access appropriate education. This was a key consideration in the design proposals.</p>
Page 151	<p>Future of Post 16 and 19 provision</p>	<p>Concerns that the proposed strategy may exclude other Post 16 and Post 19 providers.</p>	<p>There is no intention to deliver all specialist Post 16 and Post 19 provision in Special Schools. The situation will remain as it currently is; through the Education, Health and Care Plan review process the most appropriate Post 16 provision will be agreed for young people according to their needs, their aspirations and their interests. The focus will remain on preparing young people for adulthood and identifying the most appropriate Post 16 setting to support them.</p>
	<p>13. Future of residential provision</p>	<p>Questions were raised about the future of residential facilities at both St Bernard's School and St Francis School.</p>	<p>How the current residential provision will be used in the future will be influence by the decisions that come out of the wider work that is being undertaken by Special Schools, the Local Authority. Parent Carer Forum and health services. This will be reported separately.</p>

14.	Parental preference	<p>Move to 'all needs' is to remove parental preference and entitlement to transport.</p> <p>Will parents still be able to state a preference for a particular school?</p>	<p>There is no intention to remove parental preference; this is explicit in the SEND Code of Practice 2015. However, it is anticipated that, if all Special Schools are able to meet 'all needs', preference because a school has a specific designation, will no longer be an issue for parents.</p> <p>The transport policy is not changing. As is currently the case, transport will be provided, if the child has a transport entitlement, to the nearest school that can meet the child's needs. If parents choose another school that is further away then they will be required to transport their children.</p>
15.	Managing change and transition for pupils	<p>Concern that some young people won't cope well with building work in their school.</p> <p>Some children will be excited about having builders on site.</p> <p>Children may be excluded or have reduced educational support if they don't cope well with the changes.</p> <p>Will children be made to transition to their nearest school?</p> <p>Some parents would like their child to transition to their nearest school as soon as it is available to take them.</p> <p>Parents expressed trust in their child's existing</p>	<p>Any building work on a school site will have mixed responses. School Leaders will work with parents to ensure that children that don't cope well with the developments are prepared as well as possible and supported throughout. The work will be planned to minimise disruption but there will inevitably be some disturbance.</p> <p>No child will be excluded or have their education support reduced because they don't cope well with the changes. Schools are very used to working with their pupils and will also work closely with families to ensure that difficulties are anticipated and planned for. The changes will take place slowly over time and there will be opportunities for families to share any concerns they have for their child.</p> <p>No child will be made to move to their nearest Special School unless they and their family request this. If that is what they would like to do, the authority will work with the family and school to plan an appropriate point at which to make the transition.</p> <p>It was positive to hear many parents describe the trust they</p>

		school to support their child should they decide to move to their nearest school.	have in their child's current school to support transition should they decide they want their child to move at an appropriate time.
16.	Timeline and implementation plans	Members of the public keen to know what the timeline will be for the implementation of the plans and when the detail will be shared.	The next phase of the project, over the summer, will determine whether the proposals are accepted. If there is agreement then a more detailed implementation plan will be published post September 2018. If the proposals are agreed then the detailed plans relating to individual school development will be devised and schools will be able to share the detail with pupils, families and interested parties.
17.	Social, Emotional and Mental Health (SEMH) provision	Why are the SEMH schools not included in the proposals?	There are challenges regarding current capacity and whether it is sufficient or if there is a need for more primary school places and whether the existing model can meet the increasingly complex needs of pupils with SEMH. A work stream, with the objective of developing a shared ethos and way of working across the county for SEMH provision, consistent with the vision and principles of this strategy, has been established and will report once the work is completed.
18.	Extended day/groups and clubs	Parents were interested to know whether the project had considered the need for extended day and/or clubs for young people.	This is a consideration of the project. Whilst it is anticipated that children attending schools nearer to their home will have a greater opportunity to join their local clubs, it is also recognised that there may be a need to provide other opportunities for young people to access social inclusion. The Parent Carer Forum highlighted this as an area of concern for families. This is being considered in conjunction with the wider integrated health and social care offer to be developed from the work currently being undertaken.
19.	Improvements to SEND provision in mainstream schools	Mainstream Schools fail autistic children.	Please see response to Theme No. 8.
20.	Proposals as a money saving	The council cannot afford the transport costs	This is not a transport review. No child or young person

	exercise	for young people with additional needs and this proposal is really a transport review.	currently in Special School will be required to move and therefore there is no anticipated reduction in the transport budget for the foreseeable future. Inevitably, once the strategy has been implemented and established it is envisaged that more pupils will attend their local Special School and therefore there is likely to be some reduction in the transport budget. This is anticipated to be around £2-3 million but will not be realised for some considerable time.
Page 154	21. Independence of the Lincolnshire Parent Carer Forum (LPCF)	<p>The LPCF cannot be independent as it received £10,000 from the Local Authority.</p> <p>The LPCF were fully signed up to the strategy before the consultation began.</p>	<p>Parent Carer Forums are specifically tasked, under the Special Educational Needs and Disability Code of Practice (2015) with working alongside Local Authorities to ensure that the services they plan, commission, deliver and monitor meet the needs of children.</p> <p>Parent Carer Forums receive a relatively small grant from the DfE. In order for them to perform the duties set out in the statutory guidance and for the authority to fulfil its responsibility in working with the PCF. Around 55% of PCFs receive additional funding from their Local Authorities with an increasing number receiving over £25k per year as co-production has become routine in developing, and influencing both strategic and operational practice.</p> <p>In the last financial year Lincolnshire County Council grant funded the forum £10,000 to cover the expenses they would incur in being involved in the substantial work the project has required including attending meetings, work streams, holding events and seeking parental views on this consultation. LPCF funding is transparent and their accounts are published on their website.</p> <p>The PCF was supportive of the proposed strategy going to public consultation. They were able to support the proposals being consulted on because the authority and School Leaders have taken into account their feedback,</p>

			constructive challenge and the contribution that they've been able to make based on the extensive feedback they receive from parents in the county. Their support to go to consultation was just that; they, like the authority and the Special School Leaders want to hear the views of the public and this will influence the strategy going forward.
22.	Travel time for children and young people	<p>Welcome the proposals because the journey to and from school is a significant issue for some young people.</p> <p>Children's education is worth the sacrifice of longer journeys.</p> <p>Children should not be travelling miles away from home to receive an education.</p>	There are divided opinions on the journeys that many children currently make to get to their Special School. All feedback has been taken into consideration and is being shared with decision makers.
23.	Children and young people will have to move schools	<p>Concern that children will have to move schools.</p> <p>Concern that families will be disadvantaged if they choose to keep their child at their existing school.</p>	<p>No child will have to move from their current Special School unless they are due to leave or they and their family choose to move them to their nearest school when it is ready.</p> <p>No family will be disadvantaged by choosing to keep their child in their current Special School. It is anticipated that most children will remain in their current provision. If they wish to move then they will be supported to make the transition at the appropriate time.</p>
24.	Meeting the needs of deaf children	No proposals in the strategy for how the needs of deaf children will be met and/or how the Teachers of the Deaf will be deployed.	<p>See response to Theme No. 3.</p> <p>There is no proposed change to the way in which the authority deploys the Teachers of the Deaf. The service will continue to support children with hearing impairment in their setting.</p>
25.	Data and Information on children's primary and secondary	The Local Authority has underestimated the number of children with ASD. Data is flawed.	The data collated on primary and secondary needs comes from the School Census which is a Department for

	<p>needs.</p>		<p>Education survey completed by schools.</p> <p>The School Census is not a record of the number of children and young people with a diagnosis of autism. The statutory guidance is specific that a child with a medical diagnosis or disability does not have special educational needs unless special educational provision is needed to access the curriculum. There will therefore be some young people with a diagnosis of autism that will not be captured on the School Census.</p> <p>The Census requests schools to record the pupils' greatest or primary need and, where appropriate, their secondary need. Children and young people with autism may have a range of special educational needs and therefore their autism may not be the greatest presenting need at the point of the census. It will therefore never accurately capture all children with autism. This does not mean that the data is flawed.</p>
<p>9.</p>	<p>Gosberton House Academy</p>	<p>The school will be closed.</p> <p>The school has been coerced into agreeing the proposals.</p> <p>Concern that the school will lose its National Autistic Society accreditation.</p> <p>The strategy may be fine for other schools but Gosberton House should be left as it is.</p>	<p>There is no suggestion that Gosberton House will close.</p> <p>There has been no coercion. The Leaders of Gosberton House Academy has worked with LCC and all of the other Special School Heads. The Lincolnshire Education Trust endorsed the proposal going to public consultation.</p> <p>It will be for Gosberton House Academy to retain its National Autistic Society accreditation. Other schools are also currently working towards this accreditation and involved in the delivery of the outreach service.</p> <p>Ultimately it will be for the Trust to decide whether it makes a business case to the Regional School Commissioner to initiate the proposed changes.</p>

Equality Impact Analysis to enable informed decisions

The purpose of this document is to:-

- I. help decision makers fulfil their duties under the Equality Act 2010 and
- II. for you to evidence the positive and adverse impacts of the proposed change on people with protected characteristics and ways to mitigate or eliminate any adverse impacts.

Using this form

This form must be updated and reviewed as your evidence on a proposal for a project/service change/policy/commissioning of a service or decommissioning of a service evolves taking into account any consultation feedback, significant changes to the proposals and data to support impacts of proposed changes. The key findings of the most up to date version of the Equality Impact Analysis must be explained in the report to the decision maker and the Equality Impact Analysis must be attached to the decision making report.

****Please make sure you read the information below so that you understand what is required under the Equality Act 2010****

Equality Act 2010

The Equality Act 2010 applies to both our workforce and our customers. Under the Equality Act 2010, decision makers are under a personal duty, to have due (that is proportionate) regard to the need to protect and promote the interests of persons with protected characteristics.

Protected characteristics

The protected characteristics under the Act are: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation.

Section 149 of the Equality Act 2010

Section 149 requires a public authority to have due regard to the need to:

- Eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by/or under the Act
- Advance equality of opportunity between persons who share relevant protected characteristics and persons who do not share those characteristics
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The purpose of Section 149 is to get decision makers to consider the impact their decisions may or will have on those with protected characteristics and by evidencing the impacts on people with protected characteristics decision makers should be able to demonstrate 'due regard'.

Decision makers duty under the Act

Having had careful regard to the Equality Impact Analysis, and also the consultation responses, decision makers are under a personal duty to have due regard to the need to protect and promote the interests of persons with protected characteristics (see above) and to:-

- (i) consider and analyse how the decision is likely to affect those with protected characteristics, in practical terms,
- (ii) remove any unlawful discrimination, harassment, victimisation and other prohibited conduct,
- (iii) consider whether practical steps should be taken to mitigate or avoid any adverse consequences that the decision is likely to have, for persons with protected characteristics and, indeed, to consider whether the decision should not be taken at all, in the interests of persons with protected characteristics,
- (iv) consider whether steps should be taken to advance equality, foster good relations and generally promote the interests of persons with protected characteristics, either by varying the recommended decision or by taking some other decision.

Conducting an Impact Analysis

The Equality Impact Analysis is a process to identify the impact or likely impact a project, proposed service change, commissioning, decommissioning or policy will have on people with protected characteristics listed above. It should be considered at the beginning of the decision making process.

The Lead Officer responsibility

This is the person writing the report for the decision maker. It is the responsibility of the Lead Officer to make sure that the Equality Impact Analysis is robust and proportionate to the decision being taken.

Summary of findings

You must provide a clear and concise summary of the key findings of this Equality Impact Analysis in the decision making report and attach this Equality Impact Analysis to the report.

Impact – definition

An impact is an intentional or unintentional lasting consequence or significant change to people's lives brought about by an action or series of actions.

How much detail to include?

The Equality Impact Analysis should be proportionate to the impact of proposed change. In deciding this asking simple questions “Who might be affected by this decision?” “Which protected characteristics might be affected?” and “How might they be affected?” will help you consider the extent to which you already have evidence, information and data, and where there are gaps that you will need to explore. Ensure the source and date of any existing data is referenced.

You must consider both obvious and any less obvious impacts. Engaging with people with the protected characteristics will help you to identify less obvious impacts as these groups share their perspectives with you.

A given proposal may have a positive impact on one or more protected characteristics and have an adverse impact on others. You must capture these differences in this form to help decision makers to arrive at a view as to where the balance of advantage or disadvantage lies. If an adverse impact is unavoidable then it must be clearly justified and recorded as such, with an explanation as to why no steps can be taken to avoid the impact. Consequences must be included.

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Proposals for more than one option If more than one option is being proposed you must ensure that the Equality Impact Analysis covers all options. Depending on the circumstances, it may be more appropriate to complete an Equality Impact Analysis for each option.

The information you provide in this form must be sufficient to allow the decision maker to fulfil their role as above. You must include the latest version of the Equality Impact Analysis with the report to the decision maker. Please be aware that the information in this form must be able to stand up to legal challenge.

Background Information

Title of the policy / project / service being considered	Building Communities of Specialist Provision: A Strategy for Children and Young People with Special Educational Needs and Disabilities (SEND) in Lincolnshire	Person / people completing analysis	Special Education Needs and Disabilities (SEND) Special Schools Senior Project Officer
Service Area	Children's Services – Special Education Needs & Disabilities (SEND)	Lead Officer	Sheridan Dodsworth
Who is the decision maker?	For Strategy: Local Authority For changes to LA Maintained Special Schools: Local Authority For changes to Academy Special Schools: Regional Schools Commissioner	How was the Equality Impact Analysis undertaken?	In response to extensive public consultation.
Date of meeting when decision will be made	06/11/2018	Version control	Version 10– final decision
Is this proposed change to an existing policy/service/project or is it new?	Existing policy/service/project	LCC directly delivered, commissioned, re-commissioned or de-commissioned?	Commissioned
Describe the proposed change	<p>The Building Communities of Specialist Provision Strategy proposes to make significant changes to the existing special education provision, creating an integrated and sustainable school system where pupils can attend their nearest special school, confident that their education and health needs can be fully met. The strategy has been collaboratively produced by Special School Leaders, Lincolnshire County Council Children's Services and the Lincolnshire Parent Carer Forum to ensure the proposed model is based upon sector expertise and parental views. This strategy proposes to address the current system pressures which are making the existing system unsustainable: increased demand on a limited number of school places, excessively long journeys for a significant number of pupils, the potentially detrimental impact of some Out of County placements on families and the need for significant improvements to some Special School buildings.</p> <p>In order to achieve this ambition, the strategy proposes implementing a sector-wide approach to special education which would enable all special schools to all needs of pupils in their local community. As existing special schools are designed to meet specific categories of need, each school would be required to change its designations to enable them to meet all needs. In addition, the strategy proposes to increase the special school estate by over 500 places to address capacity demands, through significant capital investment to support the expansion of special schools</p>		

where there is an identified need. This capital investment would support the development of premises and facilities, enabling each school to offer places to pupils from within their local communities with a much wider range of needs. The strategy also proposes Special School satellite provision which would create a hub within mainstream schools where pupils on the Special School roll could be individually supported to access the mainstream curriculum and social opportunities.

The changes consulted on and agreed by the Regional Schools Commissioner for Academy Trusts are:

St Lawrence School, Horncastle	
Proposed Changes	Change to need catered for: from MLD/SLD to All Needs Expansion from 80 to 150
Implementation Date	Sept 2021
St Bernard's School, Louth	
Proposed Changes	Change to need catered for: from SLD/PMLD to All Needs Expansion from 88 to 100
Implementation Date	Sept 2022
The Eresby School, Spilsby	
Proposed Changes	Change to need catered for: from SLD/PMLD to All Needs Expansion from 64 to 84
Implementation Date	Sept 2020
The Sandon School and Ambergate Sports College	

Proposed Changes	Amalgamation to one school across 2 sites Change to need catered for: to All Needs across one school from a SLD/PMLD school and an MLD/SLD school Expansion from 152 to 229
Implementation Date	Sept 2021
The Priory School and The Garth School, Spalding	
Proposed Changes	Amalgamation to one school across 2 sites Change to need catered for: to All Needs across one school from a SLD/PMLD school and an MLD/SLD school Expansion from 128 to 177
Implementation Date	Sept 2022
The John Fielding School, Boston	
Proposed Changes	Change to need catered for: from SLD/PMLD to All Needs Relocation Expansion from 56 to 140
Implementation Date	Sept 2021
Gosberton House Academy, Gosberton	

Proposed Changes	Change to need catered for: from ASD/SLCN to All Needs No proposed change to school size.
Implementation Date	Sept 2023

Warren Wood and Aegir Schools (Mayflower Specialist Academy Trust) already meet All Needs across both schools so whilst consultation was held, there is no formal change process to complete.

The prescribed alterations consulted on for LA maintained schools are:

St Francis School, Lincoln	
Proposed Changes	Change to need catered for: from PD/PMLD to All Needs Expansion from 128 to 173
Implementation Date	Sept 2021

St Christopher's School, Lincoln	
Proposed Changes	Change to need catered for: from MLD/SLD/ASD to All Needs Reduction from 200 to 155
Implementation Date	Sept 2023

Willoughby School, Bourne	
Proposed Changes	Change to need catered for: from SLD/PMLD to All Needs Expansion from 80 to 148
Implementation Date	Sept 2020



Evidencing the impacts

In this section you will explain the difference that proposed changes are likely to make on people with protected characteristics. To help you do this first consider the impacts the proposed changes may have on people without protected characteristics before then considering the impacts the proposed changes may have on people with protected characteristics.

You must evidence here who will benefit and how they will benefit. If there are no benefits that you can identify please state 'No perceived benefit' under the relevant protected characteristic. You can add sub categories under the protected characteristics to make clear the impacts. For example under Age you may have considered the impact on 0-5 year olds or people aged 65 and over, under Race you may have considered Eastern European migrants, under Sex you may have considered specific impacts on men.

Data to support impacts of proposed changes

When considering the equality impact of a decision it is important to know who the people are that will be affected by any change.

Population data and the Joint Strategic Needs Assessment

The Lincolnshire Research Observatory (LRO) holds a range of population data by the protected characteristics. This can help put a decision into context. Visit the LRO website and its population theme page by following this link: <http://www.research-lincs.org.uk> If you cannot find what you are looking for, or need more information, please contact the LRO team. You will also find information about the Joint Strategic Needs Assessment on the LRO website.

Workforce profiles

You can obtain information by many of the protected characteristics for the Council's workforce and comparisons with the labour market on the [Council's website](#). As of 1st April 2015, managers can obtain workforce profile data by the protected characteristics for their specific areas using Agresso.

Positive impacts

The proposed change may have the following positive impacts on persons with protected characteristics – If no positive impact, please state 'no positive impact'.

<p>Age</p>	<p>Pupils aged 2 – 19 years with Special Educational Needs and Disabilities.</p> <p>Age has been considered as a protected characteristic with regards to pupils with SEND and their experience of transition. By removing the need to transition between many of the schools within the reforms, the strategy recognises that pupils with SEND have different needs than their mainstream peers when it comes to moving school. The impact of transition between primary and secondary school has been considered within the consultation and responses regarding all through schools have been largely supportive with no significant opposition. Linkage Community Trust raised this issue in their consultation response, advising that children and young people may benefit from some degree of transition as it reflects real life and the world outside education.</p> <p>Special School Leaders have endorsed the merits of remaining in one school for the duration of a pupil's education, particularly for pupils who are less able to cope with change, therefore, where possible, the model is based upon all through provision. Schools where there is a requirement for transition from primary to secondary already work in close partnership to ensure transition is smooth and well-managed and the LA has agreed this should continue.</p> <p>One of the main drivers behind the reforms is the excessive journeys some pupils have to undertake to get to and from school. By creating a special school system which enables pupils to access a school closer to home, the need for long and arduous journeys will be reduced. At present almost 70% pupils do not attend their nearest Special School, with some pupils travelling past other Special Schools to be educated where their specific needs can be met or where there is capacity. The impact of considerable travel distance on pupils and families cannot be underestimated and it is a basic matter of equity to seek to strive for as short and stress-free a journey to and from school as possible. It is not uncommon for pupils to have a three hour daily round trip to and from school.</p> <p>The impact of travel on young children is significant but for children with SEND, the burden is greater. Shorter, more stress-free journeys can help deliver the following clear benefits and advantages:</p> <ul style="list-style-type: none">• A shorter day overall, allowing more amenity time for pupils and parents• Potential for more participation in after-school activities and before-school activities, such as breakfast clubs• fewer stressful and time-consuming journeys• Potential for improved school performance, through better ability to concentrate• More resilience to fatigue
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	<p>It is well established that the most productive part of a child's school-day is the time spent in the school learning and interacting with his/her peers. Travel to school is a necessary part of the process, but most of the travel time is educationally and socially unproductive for children attending special schools. It is desirous to reduce this part of the child's day insofar as it is possible to do whilst ensuring the best provision for him/her.</p>
<p>Disability</p>	<p>The primary equality consideration for the strategy is the protected characteristic of people with disabilities, as it proposes to significantly enhance the educational experience of pupils with SEND. In producing the strategy, the needs of pupils with SEND and their families have been central to its development with the primary aim of enabling pupils to access the right education, health and care provision, at the right time, as close to home as possible; a principal which their mainstream peers experience as standard. In order to ensure pupils with SEND and their families opinions are considered throughout the strategy, Lincolnshire Parent Carer Forum have been actively involved in its development and public consultation has been extensive.</p> <p>The strategy proposes to enhance inclusion by reshaping the Special School system to remove designations, enabling pupils to attend their local school which will meet all type of need and disability. By investing in schools to ensure they have the facilities to meet all needs, pupils will be able to attend school locally. The shorter school day will also impact on pupil experience, enabling school friendships to be cultivated and enhancing the sense of community for children and young people with disabilities. By attending a local school, pupils will have greater access to after-school clubs and activities as transport arrangements can be altered to reflect the school day when journeys are shorter.</p> <p>By implementing provision without boundaries, the strategy will seek to reduce segregation across the sector and offer pupils with SEND more opportunity for integration and inclusion. The proposed mechanisms within the strategy which will encourage greater collaboration between mainstream and special school i.e. special school satellites, will offer greater access to the mainstream curriculum, social activities and extended day; affording pupils with SEND the equal opportunities and experiences as their mainstream peers. This strategy also encourages pupils with SEND to foster good relationships with their mainstream peers by providing greater opportunity to associate.</p> <p>At present 81 pupils with SEND are educated in Out of County and Independent Non-Maintained Special Schools, away from their families. Over 70% of this cohort needs to be educated away from home because local schools cannot meet their needs due to behaviours which are hard to manage and related to their needs or disability. The capital investment programme will support special schools to meet the needs of some of these pupils by providing specific facilities such as calming spaces and sensory and therapeutic spaces to meet this cohort's needs, whilst recognising the need for specialist OOC provision for some pupils.</p> <p>The move to All Needs education in Lincolnshire will undoubtedly present some difficulties for staff as special schools accept pupils with a wider range of needs and greater complexities., Special School Leaders are confident that their workforce has the skills and expertise required and that by establishing a collaborative and supportive relationship across all schools, staff will have access to the additional professional development opportunities. In order to ensure this is</p>

	<p>achievable, LCC have committed revenue funding from the DSG underspend to establish a learning network for all Special School staff, which will include access to specialist training and a learning forum offering advice from sector experts and opportunities to share best practice.</p> <p>The LA believes this strategy will also would support workforce development in mainstream schools, staff with a greater knowledge and understanding of SEND. Upskilled staff would ultimately foster a more inclusive environment where more pupils could remain in the mainstream setting for longer or even for the duration of their education. Special School staff would provide valuable skills and knowledge to their mainstream colleagues, enhancing the mainstream skill set.</p> <p>In response to the consultation, consideration has been given to the small cohort of pupils with hearing impairment who are assessed via the EHCP process as requiring education in a specialist school for the deaf. The number of pupil's who require access to a school which uses British Sign Language as a first language, is significantly low that it would not be viable to provide this type of specialist school and the current process will remain.</p>
Gender reassignment	No positive impact .All protected characteristics relate specifically to the educational provision pupils receive within the school setting, which is not going to change as a result proposals of the strategy.
Marriage and civil partnership	No positive impact. All protected characteristics relate specifically to the educational provision pupils receive within the school setting, which is not going to change as a result proposals of the strategy.
Pregnancy and maternity	No positive impact. All protected characteristics relate specifically to the educational provision pupils receive within the school setting, which is not going to change as a result proposals of the strategy.
Race	No positive impact. All protected characteristics relate specifically to the educational provision pupils receive within the school setting, which is not going to change as a result proposals of the strategy.
Religion or belief	No positive impact. All protected characteristics relate specifically to the educational provision pupils receive within the school setting, which is not going to change as a result proposals of the strategy.

Sex	No positive impact. All protected characteristics relate specifically to the educational provision pupils receive within the school setting, which is not going to change as a result proposals of the strategy.
Sexual orientation	No positive impact. All protected characteristics relate specifically to the educational provision pupils receive within the school setting, which is not going to change as a result proposals of the strategy.

If you have identified positive impacts for other groups not specifically covered by the protected characteristics in the Equality Act 2010 you can include them here if it will help the decision maker to make an informed decision.

Creates more local choice for parents of pupils with SEND with regard to identifying an appropriate school setting for their child. All schools would be able to meet child's specific needs and would have the capacity and resources to support admission.

Improved family life for parents and siblings of pupils with SEND through:

- More family time as journeys to and from school are shorter
- Greater opportunity to access after-school clubs
- Stronger sense of belonging within local community and reduced levels of isolation.
- Peer and family support opportunities due to proximity to other families with SEND

Upskilled workforce across the sector would benefit:

- All mainstream school pupils by providing staff with a range of skills to support learning
- Pupils with SEND in mainstream schools as staff better placed to meet their needs
- Mainstream school staff in their continued professional development

Rural communities in particular might benefit from these changes, in terms of sustaining more local services, reducing traffic on the roads as a result of reducing the need to travel long distances and the resulting environmental and health benefits of less traffic.

Adverse/negative impacts

You must evidence how people with protected characteristics will be adversely impacted and any proposed mitigation to reduce or eliminate adverse impacts. An adverse impact causes disadvantage or exclusion. If such an impact is identified please state how, as far as possible, it is justified; eliminated; minimised or counter balanced by other measures.

If there are no adverse impacts that you can identify please state 'No perceived adverse impact' under the relevant protected characteristic.

Negative impacts of the proposed change and practical steps to mitigate or avoid any adverse consequences on people with protected characteristics are detailed below. If you have not identified any mitigating action to reduce an adverse impact please state 'No mitigating action identified'.

Age	<p>There are no proposed changes within the strategy to the age range of special schools and all will retain their current age range designation. However, the consequence of the merger between The Priory School and The Garth School will result in pupils from 2-19 years being educated on the site of the Priory School which is a secondary school at present. This is due to the fact that the merger is between a secondary school and an all through school which will be required to meet all needs for all ages across both sites.</p> <p>This issue has been discussed in detail at the school consultations and at subsequent coffee mornings held by the school. There have been no objections raised to the plans around the school merger and no concerns regarding impact on age range.</p> <p>In developing plans for the expansion at The Priory School, the LCC Corporate Property Service have given due consideration to the building schedule to ensure appropriate facilities for primary age pupils are developed. This will include age-appropriate classrooms and outside space to meet the needs of primary age pupils with SEND.</p>
Disability	<p>Contributions to the consultation highlighted a degree of anxiety from some parent/carers and professionals associated with two schools within the strategy: St Francis Special School and Gosberton House Academy. This related to the proposed changes to school designation, moving to All Needs from specialist provision and the possible impact on education standards. This has been given due consideration by the Special Schools Project Board who are confident that the standard of education will not be negatively impacted due to the proposals for workforce development within the strategy. The effect on educational standards will be monitored closely through existing school performance frameworks and Ofsted outcomes.</p> <p>The consultation also raised concerns regarding the safety of pupils with the most complex needs in All Needs provision.</p>

	<p>Once implemented, Education Leaders will ensure the unique needs of all pupils will continue to be paramount and their schools will have the appropriate environments to ensure all individual needs can be met. School environments will be re-modelled to ensure schools can accommodate all pupils in a safe and secure space.</p> <p>The consultation responses from both Gosberton House Academy and St Francis Special School also raised concerns regarding a potential loss of parental choice. Reassurance has been provided that there is no intention to remove parental preference; this is explicit in the SEND Code of Practice 2015. However, it is anticipated that, if all Special Schools are able to meet 'all needs', preference because a school has a specific designation, will no longer be an issue for parents.</p>
Gender reassignment	No perceived adverse impact. All protected characteristics relate specifically to the educational provision pupils receive within the school setting, which is not going to change as a result of the proposals in the strategy..
Marriage and civil partnership	No perceived adverse impact. All protected characteristics relate specifically to the educational provision pupils receive within the school setting, which is not going to change as a result of the proposals in the strategy..
Pregnancy and maternity	No perceived adverse impact. All protected characteristics relate specifically to the educational provision pupils receive within the school setting, which is not going to change as a result of the proposals in the strategy.
Race	No perceived adverse impact. All protected characteristics relate specifically to the educational provision pupils receive within the school setting, which is not going to change as a result of the proposals in the strategy.
Religion or belief	No perceived adverse impact. All protected characteristics relate specifically to the educational provision pupils receive within the school setting, which is not going to change as a result of the proposals in the strategy.
Sex	No perceived adverse impact. All protected characteristics relate specifically to the educational provision pupils receive within the school setting, which is not going to change as a result of the proposals in the strategy.

Sexual orientation

No perceived adverse impact. All protected characteristics relate specifically to the educational provision pupils receive within the school setting, which is not going to change as a result of the proposals in the strategy.

If you have identified negative impacts for other groups not specifically covered by the protected characteristics under the Equality Act 2010 you can include them here if it will help the decision maker to make an informed decision.

The consultation has not highlighted any additional negative impacts for other groups not specifically covered by the protected characteristics.

Stakeholders

Stake holders are people or groups who may be directly affected (primary stakeholders) and indirectly affected (secondary stakeholders)

You must evidence here who you involved in gathering your evidence about benefits, adverse impacts and practical steps to mitigate or avoid any adverse consequences. You must be confident that any engagement was meaningful. The Community engagement team can help you to do this and you can contact them at consultation@lincolnshire.gov.uk

State clearly what (if any) consultation or engagement activity took place by stating who you involved when compiling this EIA under the protected characteristics. Include organisations you invited and organisations who attended, the date(s) they were involved and method of involvement i.e. Equality Impact Analysis workshop/email/telephone conversation/meeting/consultation. State clearly the objectives of the EIA consultation and findings from the EIA consultation under each of the protected characteristics. If you have not covered any of the protected characteristics please state the reasons why they were not consulted/engaged.

Objective(s) of the EIA consultation/engagement activity

Non-Statutory Consultation

The strategy proposes to address existing inequalities for children and young people with SEND by reshaping the special school system to remove designations from the entry criteria, enabling pupils to attend their local school which will meet all type of need and disability.

The purpose of the public consultation period was to gather feedback from parent/carers, schools and other interested parties on the proposed strategy and recommended changes to individual schools and academies. Due consideration has been given to the key principals of consultation ensuring it would be fair, transparent, informative and provide ample time and opportunity for interested parties to contribute.

In order to ensure all interested parties were fully aware of the proposed strategy and subsequent consultation, a dedicated webpage was launched detailing the

strategy and how to engage in the consultation process. It was developed to ensure all information could be accessed in one place and included an easy to read summary of the strategy, links to the surveys to encourage feedback and a full list of consultation events. It was supported by a comprehensive communication plan which promoted the proposed strategy and consultation across local media and social media outlets.

A consultation letter outlining the proposed strategy and rationale for change was circulated to over 1000 key interested parties including.

- Department for Education
- Education Funding Alliance
- Local MP's
- Local MEP's
- Regional Schools Commissioner
- National Charities and third sector providers working for children and young people with SEND in Lincolnshire
- Neighbouring Local Authorities
- District Council Chief Executives
- District Councillors
- Parish Councillors
- Trade Unions
- Health Commissioners and Providers
- All Lincolnshire Special Schools (Heads and Governing Bodies)
- All Lincolnshire Mainstream Schools (via Perspective Lite)
- All Out of County and Independent Non-Maintained Special Schools where Lincolnshire pupils are currently placed
- Alternative Provision/Pupil Referral Units
- All Special Educational Needs and Disabilities Coordinators (SENDCo) registered with LCC SENDCo Network
- All Lincolnshire Independent Schools
- All Parent/Carers of pupils at Special School (including OOC and INMS)
- All Parent/Carers of pupils electively home educated with SEND

Parent/Carers of pupils with SEND currently attending Special School received the consultation information and details of the planned events from their child's school by letter. Special Schools also published links to the LCC webpage on their websites and regularly encouraged contributions to the consultation.

Members of the Lincolnshire Parent Carer Forum also received information regarding the proposed strategy and details of how to engage in the consultation via the LPCF website. LPCF publicised the consultation across their network extensively and regularly sent out email reminders with links to the LCC webpage, encouraging parental involvement.

All mainstream schools were informed of the consultation via Perspective Lite (LCC's communication system for schools). This included a request to share the consultation letter and dedicated website details with all parent/carers of pupils with Education and Health Care Plans (EHCP) in their schools and also to post details of the consultation on the school website. In addition, this information was circulated to all SENDCo's registered with the LCC SENDCo Network with a request to ensure that all parent/carers of pupils with SEND were made aware.

Opportunity to contribute to the consultation was provided through three mechanisms:

- Attendance at one of the twenty-one consultation events being facilitated across the county.
- Complete the online survey.
- Email the SEND Communities mailbox.

Twenty-one consultation events were planned to provide opportunity for interested parties to openly discuss the proposals and raise questions. These events were a combination of school led events, LPCF events and LCC public events.

Two consultation surveys were developed by the LCC Community Engagement team, in conjunction with SNAP Surveys; one specifically for adults and one for children and young people. Lincolnshire Parent Carer Forum advised on the design of the survey to ensure it was family-friendly. Links to the surveys were placed on the dedicated website for the strategy, in order to ensure all information was accessible.

In order to ensure that the consultation provided ample opportunity for interested parties to make their contributions, further questions and comments were invited via the SEND Communities mailbox. All emails received through this route were acknowledged and detailed responses provided where specific questions were asked.

The strategy has been presented to other interested parties throughout the consultation period including health commissioners and providers, education leaders and trade union representatives who have all given their support to the proposed strategy.

Statutory Consultation

On 27th July 2018, Executive Councillor gave approval to move to formal representation period for the 3 LA maintained schools. The dates of the representation periods for each school were as follows:

St Francis Special School	30th August 2018 – 27th September 2018
St Christopher's School	30th August 2018 – 27th September 2018
The Willoughby School	31st August 2018 – 28th September 2018

In accordance with the process set out in DfE statutory guidance "Making prescribed alterations to maintained schools", Statutory Notices were published, on the first day of the representation periods in the local press, posted on the school gates and displayed in public areas in the schools. In addition this opportunity for further consultation was publicised on the LA website, with a number of mechanisms for contribution provided.

There have been no representations made in relation to the proposed alterations to the 3 LA maintained schools during this period. It is unlikely that this is due to a lack of awareness from parent/carers as ample opportunities to make representations were provided and the Statutory Notices well publicised. It is more likely that the informal consultation process was so extensive and wide-reaching that those associated with the 3 LA maintained schools had already made their representations and are satisfied with the strategic direction presented.

Who was involved in the EIA consultation/engagement activity? Detail any findings identified by the protected characteristic

Age	In order to ensure pupils with SEND and their families opinions are considered throughout the strategy, Lincolnshire Parent Carer Forum held their own independent events within the consultation process. Their report can be found within the Consultation Outcome Report.
Disability	<p>In order to ensure pupils with SEND and their families opinions are considered throughout the strategy, Lincolnshire Parent Carer Forum held their own independent events within the consultation process. Their report can be found within the Consultation Outcome Report</p> <p>Children and young people with SEND were invited to contribute via the following mechanisms:</p> <ol style="list-style-type: none"> 1. Dedicated survey 2. Discussions facilitated by Special Schools within the strategy 3. Supported attendance at consultation events <p>Responses have been considered within the consultation outcome report.</p>
Gender reassignment	In order to ensure pupils with SEND and their families opinions are considered throughout the strategy, Lincolnshire Parent Carer Forum held their own independent events within the consultation process. Their report can be found within the Consultation Outcome Report.
Marriage and civil partnership	In order to ensure pupils with SEND and their families opinions are considered throughout the strategy, Lincolnshire Parent Carer Forum held their own independent events within the consultation process. Their report can be found within the Consultation Outcome Report.
Pregnancy and maternity	In order to ensure pupils with SEND and their families opinions are considered throughout the strategy, Lincolnshire Parent Carer Forum held their own independent events within the consultation process. Their report can be found within the Consultation Outcome Report.

Race	In order to ensure pupils with SEND and their families opinions are considered throughout the strategy, Lincolnshire Parent Carer Forum held their own independent events within the consultation process. Their report can be found the Consultation Outcome Report.
Religion or belief	In order to ensure pupils with SEND and their families opinions are considered throughout the strategy, Lincolnshire Parent Carer Forum held their own independent events within the consultation process. Their report can be found within the Consultation Outcome Report.
Sex	In order to ensure pupils with SEND and their families opinions are considered throughout the strategy, Lincolnshire Parent Carer Forum held their own independent events within the consultation process. Their report can be found within the Consultation Outcome Report.
Sexual orientation	In order to ensure pupils with SEND and their families opinions are considered throughout the strategy, Lincolnshire Parent Carer Forum held their own independent events within the consultation process. Their report can be found within the Consultation Outcome Report.
<p>Are you confident that everyone who should have been involved in producing this version of the Equality Impact Analysis has been involved in a meaningful way?</p> <p>The purpose is to make sure you have got the perspective of all the protected characteristics.</p>	Yes – the consultation process has been exhaustive and thorough with over 1000 key interested parties consulted and a respectable number of contributions received.
<p>Once the changes have been implemented how will you undertake evaluation of the benefits and how effective the actions to reduce adverse impacts have been?</p>	<p>Evaluation and effectiveness will be undertaken through considering a variety of measures, including:</p> <ul style="list-style-type: none"> • Numbers of requests for Education, Health and Care Needs Assessments • Numbers of children placed in specialist provision • Numbers of pupils with SEND in mainstream schools • Numbers of children going to out of county placements • Numbers of cases going to mediation and/or tribunal • Impact on SEND Transport • Educational attainment • Progress data • Exclusions data • Parent and young people's feedback

- Overarching monitoring of support and provision will be done through the Annual Review process
- Ofsted Outcomes

NB Should the reduction of adverse impacts be less effective than planned, then further measures will be considered to address those issues

Further Details

Are you handling personal data?	<p>No</p> <p>If yes, please give details.</p>
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Actions required	Action	Lead officer	Timescale
Include any actions identified in this analysis for on-going monitoring of impacts.			
Signed off by		Date	28/09/2018

Open Report on behalf of Keith Ireland, Chief Executive

Report to:	Executive
Date:	06 November 2018
Subject:	Joint Municipal Waste Management Strategy
Decision Reference:	I016468
Key decision?	Yes

Summary:

This paper accompanies the final version of the Joint Municipal Waste Management Strategy (JMWMS) which the Lincolnshire Waste Partnership (LWP) has endorsed as being ready to be presented for adoption by each of its member councils.

The Executive is asked to endorse the proposed JMWMS and to recommend its adoption by the County Council at its meeting on 14th December 2018.

Recommendation(s):

That the Executive endorse the proposed Joint Municipal Waste Management Strategy (JMWMS) attached as Appendix A and recommend to the County Council at its meeting on 14th December 2018 that the said Strategy be formally adopted by the Council, subject to the Strategy in the same form being formally adopted by all the waste collection authorities in Lincolnshire.

Alternatives Considered:

1. Return the JMWMS to the LWP specifying the reasons why the Executive is unable to endorse the proposed JMWMS.

Reasons for Recommendation:

The LWP consider that the proposed JMWMS represents the best way forwards for the management of municipal waste in Lincolnshire.

The JMWMS has been developed in cooperation with all LWP partners, taking into account feedback from public consultation and from the formal scrutiny processes of each individual partner council.

In the event that the Executive takes a different view and recommends that the County Council should not adopt the proposed JMWMS, the matter would have

to be referred back to the LWP. Given that any amendments requested by the Executive would need to be agreed by all members of the LWP, this is likely to lead to a significant delay in the adoption of an up-to-date JMWMS.

1. Background

Under the Waste and Emissions Trading (WET) Act 2003, authorities in two-tier areas have a duty to have, and to keep updated, a shared waste strategy. This allows Waste Collection Authorities (WCA) and Waste Disposal Authorities (WDA) to work together in deciding how they will manage municipal waste in their area.

To fulfil this duty, the Lincolnshire Waste Partnership (LWP) has developed a proposed Joint Municipal Waste Management Strategy (JMWMS). The attached JMWMS has been through a number of stages:

- July 2017 – LWP agreement of a vision and a list of objectives
- 2017/18 – Various initial drafts developed and revised
- March 2018 – Consultation Draft approved by LWP
- April to July 2018 – Public Consultation, including formal scrutiny by LWP partner councils
- August 2018 – Revised Draft prepared in the light of consultation responses, including comments from Environment and Economy Scrutiny Committee
- 10th September 2018 – LWP endorsed JMWMS as ready for formal adoption by each partner council
- 18th September 2018 – Environment and Economy Scrutiny reviewed the Revised Draft JMWMS and recommended that that it be adopted by the County Council

The proposed JMWMS as attached is essentially that Revised Draft but, with specific changes as agreed by the LWP:

- A new front cover with updated photographs;
- A foreword written by the Chair and Vice Chair of the LWP; and
- Updated data where available, and other minor amendments to the text.

The proposed JMWMS sets out, in Chapter 1:

- The LWP's **vision**: “To seek the best environmental option to provide innovative, customer-friendly waste management solutions that give value for money to Lincolnshire.”
- The agreed **strategic objectives** as listed below.

1	To improve the quality and therefore commercial value of our recycling stream.
2	To move towards a common set of recycling materials.
3	To consider the introduction of separate food waste collections where technically, environmentally and economically practicable.
4	To explore new opportunities of promoting waste minimisation and of using all waste as a resource in accordance with the waste hierarchy.
5	To contribute to the UK recycling targets of 50% by 2020 and 55% by 2025.

6	To find the most appropriate ways to measure our environmental performance, and set appropriate targets.
7	To seek to reduce our carbon footprint.
8	To make an objective assessment of what further waste processing/disposal capacity is required and, as necessary, secure appropriate capacity.
9	To regularly review the LWP governance model in order to provide the best opportunity to bring closer integration and the implementation of the objectives set by the strategy.
10	To consider appropriate innovative solutions in the delivery of our waste management services.

Chapter 1 also summarises the contents of the rest of the JMWMS including:

- A summary of key legislation;
- An assessment of our current services;
- Actions to achieve our objectives, along with an initial Action Plan; and
- Notes on the next steps to be taken beyond adoption of the Strategy.

Public Consultation

As referred to in the above timeline the proposed JMWMS, with its accompanying SEA Environmental Report (see below), was released for 90 days of Public Consultation between April and July 2018. Details and analysis of the consultation responses, including those from LWP partner councils, can be found in Appendix B of the JMWMS. Also listed there are the changes made in response to the feedback received which included:

- Strengthening of some of the **strategic objectives**, whilst keeping the overall meaning which 89% of respondents agreed with; and
- Adding an initial **Action Plan** (included in the JMWMS as Appendix D) to indicate ways in which the LWP will work together to achieve the agreed objectives.

The Executive must give conscientious consideration to the results of the consultation in reaching their decision.

Strategic Environmental Assessment

The proposed JMWMS has also been subject to Strategic Environmental Assessment (SEA). Such an assessment is a legal requirement for certain types of plans and programmes under the Environmental Assessment of Plans and Programmes Regulations 2004. Under those Regulations the relevant plan or programme (in this case the JMWMS) cannot be adopted unless account has been taken of the Environmental Assessment Report and the responses to consultation on the JMWMS and the Report.

The SEA Environmental Report was circulated as part of the JMWMS Public Consultation. The main body of the Environmental Report is attached at Appendix B. The Appendices which relate to baseline data, other plans and an earlier stage of consultation are not attached but can be viewed on the JMWMS web page (see address in the Background Papers section of this report).

Whilst most of the identified environmental impacts are positive, the Environmental Report does suggest some potential negative impacts. These have been and will continue to be addressed as follows:

- Food waste collections – The strategic objective relating to this now explicitly states that the LWP will "consider the introduction of separate food waste collections where technically, **environmentally** and economically practicable".
- Possible new waste management facilities – The strategic objective relating to this has been widened to include consideration of processes higher up the Waste Hierarchy. Also, the actual development of any sites will be subject to environmental assessment and monitoring.
- Monitoring – As stated in the strategic objectives and Action Plan, the LWP will identify and report on a suite of appropriate measures for environmental performance. The measures proposed in the Environmental Report will be considered for this list.

Appendix B of the JMWMS contains the results and analysis of the public consultation on the Environmental Report as it contains the results and analysis of the consultation results for the JMWMS itself.

Action Plan

The initial Action Plan, included in the proposed JMWMS as Appendix D, is based around four main workstreams developed in discussion with the LWP council Chief Executives. A fifth workstream has been added to reflect, both from the objectives and from the SEA, the need to monitor our environmental performance. These workstreams, and the thinking behind them, are described in more detail in section 7.5 (page 55) of the proposed JMWMS:

1. Strategic Review of Kerbside Mixed Dry Recycling Collection and Disposal
2. Food Waste Trial
3. Strategic Review of Options for Continuous Improvement for Waste Collection and Disposal Arrangements in Lincolnshire
4. Location of additional processing/disposal sites; and
5. Choosing performance indicators appropriate to measure environmental performance

It should be noted that the initial Action Plan largely relates to the development of future proposals, and that any specific proposals arising from that work will themselves be subjected to the normal political decision-making processes.

Adoption

Each partner council is now asked to undertake the necessary processes for formal adoption of the JMWMS and thus fulfil their duties under the WET Act.

2. Legal Issues:

Equality Act 2010

Under section 149 of the Equality Act 2010, the Council must, in the exercise of its functions, have due regard to the need to:

* Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act

* Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it

* Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The relevant protected characteristics are age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; and sexual orientation

Having due regard to the need to advance equality of opportunity involves having due regard, in particular, to the need to:

* Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic

* Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it

* Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low

The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities

Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to tackle prejudice, and promote understanding

Compliance with the duties in section 149 may involve treating some persons more favourably than others

The duty cannot be delegated and must be discharged by the decision-maker. To discharge the statutory duty the decision-maker must analyse all the relevant material with the specific statutory obligations in mind. If a risk of adverse impact is identified consideration must be given to measures to avoid that impact as part of the decision making process

An Equality Impact Analysis has been carried out, and this was updated in the light of responses to the formal consultation. That consultation included specific questions regarding any potential positive or adverse impacts on any of the protected characteristics groups.

Key negative impacts identified, and mitigation measures, included:

- Confusion over service changes (consultation responses mentioned various groups, particularly the elderly) – Any changes will be accompanied by focussed communications by a variety of means
- Accessibility to services – Assistance (e.g. assisted collections) will be provided to those who need it
- Health issues for the vulnerable from decaying food – Any new collections

would be weekly. In most cases this is more frequent than existing collections (included with general waste)

Further details are given in the EIA which is attached as Appendix C to this report.

Joint Strategic Needs Analysis (JSNA and the Joint Health and Wellbeing Strategy (JHWS)

The Council must have regard to the Joint Strategic Needs Assessment (JSNA) and the Joint Health & Well Being Strategy (JHWS) in coming to a decision

The proposed JMWMS is considered to contribute to the aims of the JHWS by taking into account and minimising impacts on the environment.

Crime and Disorder

Under section 17 of the Crime and Disorder Act 1998, the Council must exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent crime and disorder in its area (including anti-social and other behaviour adversely affecting the local environment), the misuse of drugs, alcohol and other substances in its area and re-offending in its area

This obligation has been considered but is not thought to be directly affected by the proposals in the JMWMS.

3. Conclusion

The proposed JMWMS has been endorsed by the LWP as being ready to go before each partner Council for formal adoption. It has been prepared with the cooperation of all eight Lincolnshire councils, and has public support as evidenced through the consultation process.

The preparation of the JMWMS has also been subject to Strategic Environmental Assessment and it is considered that it promotes the right balance between selecting the best environmental options and providing value for money.

The Executive is therefore asked to endorse the proposed JMWMS and to recommend its adoption by the County Council at its meeting on 14th December 2018.

4. Legal Comments:

The Council is under a duty, together with other Councils in Lincolnshire, to have and keep up to date a joint waste strategy. Ultimate approval by full Council of the proposed Joint Municipal Waste Management Strategy (JMWMS) proposed in the Report would fulfil this obligation.

The Executive must give conscientious consideration to the results of the public consultation on the JMWMS and must take account of the Strategic Environmental Assessment Report and the results of the consultation on that Report in reaching a decision.

The JMWMS is part of the policy framework of the Council and approval of the JMWMS is therefore reserved to the full Council.

The decision whether to recommend the proposed JMWMS to the full Council is within the remit of the Executive.

5. Resource Comments:

Accepting the recommendation in this report, to endorse the Joint Municipal Waste Management Strategy for adoption by the Council, should have no direct financial impact on the Council. Any costs arising from the adoption of this strategy and the associated action plan, will need to be met from service budgets approved by the Council.

6. Consultation

a) Has Local Member Been Consulted?

n/a

b) Has Executive Councillor Been Consulted?

Yes

c) Scrutiny Comments

The Environment and Economy Scrutiny Committee considered the revised draft of the Joint Municipal Waste Management Strategy at its meeting on 18 September 2018. The Committee was advised that the Council had a statutory duty to have a waste management strategy in place, and this had been jointly created with the district councils through the Lincolnshire Waste Partnership. The Environment and Economy Scrutiny Committee endorse the revised Draft Joint Municipal Waste Management Strategy and recommend that that it be adopted by the County Council on 14 December 2018.

d) Have Risks and Impact Analysis been carried out?

Yes

e) Risks and Impact Analysis

Set out in the body of the Report and its Appendices

7. Appendices

These are listed below and attached at the back of the report	
Appendix A	Waste Strategy for Lincolnshire (final version of JMWMS) <i>(NOTE – Owing to its size, this document is only available to view electronically via the below link or upon request:</i> http://lincolnshire.moderngov.co.uk/ieListDocuments.aspx?CId=121&MId=4973&Ver=4)
Appendix B	Strategic Environmental Assessment Report (main body) <i>(NOTE – Owing to its size, this document is only available to view electronically via the below link or upon request:</i> http://lincolnshire.moderngov.co.uk/ieListDocuments.aspx?CId=121&MId=4973&Ver=4)
Appendix C	Equality Impact Analysis <i>(NOTE – Owing to its size, this document is only available to view electronically via the below link or upon request:</i> http://lincolnshire.moderngov.co.uk/ieListDocuments.aspx?CId=121&MId=4973&Ver=4)

8. Background Papers

Document title	Where the document can be viewed
Strategic Environmental Assessment - Environmental Report including Appendices	https://www.lincolnshire.gov.uk/recycling-and-waste/waste-strategy-for-lincolnshire/37756.article

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Waste Strategy for Lincolnshire

Lincolnshire Waste Partnership 2018



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Foreword

By Chair and Vice Chair on behalf of the Lincolnshire Waste Partnership

Welcome and thank you for your interest in Lincolnshire Waste Partnership's waste management strategy for Lincolnshire.

It is clear the cost of waste collection and disposal in the county will increase over the coming years, a fact that led all eight partner agencies to come together and work towards a sustainable strategy for today and for the future.

The LWP consulted the public on the strategy and it has now been formally adopted. It is aimed at keeping those expected cost increases to a minimum, while safeguarding our environment and making the best use of the resources available to us.

However, it is not just local action that is needed to make a difference. The strategy includes plans to lobby for changes to current legislation, particularly around food packaging.

Where we can't reduce waste or recycle it, we need to use it as a resource in itself – to create energy – and the waste partnership will work with other organisations to make sure we can do this as efficiently and economically as possible.

The joint strategy has been put together with the help and hard work of councillors and officers from the partner councils and with input from the public.

But this is just the beginning of our work. It is a plan of action for the LWP to follow, but with the flexibility required to make it possible for all of us to improve and develop our waste reduction, recycling and disposal efforts.

1 Summary

This Joint Municipal Waste Management Strategy (JMWMS) for Lincolnshire sets out how the members of the Lincolnshire Waste Partnership (LWP) will work in partnership to protect the environment by delivering sustainable waste management services and to establish best value waste management practices for the benefit of Lincolnshire.

The Lincolnshire Waste Partnership's vision for this Strategy is:

“To seek the best environmental option to provide innovative, customer-friendly waste management solutions that give value for money to Lincolnshire.”

1.1 This version of the Strategy

This final version of the Strategy has been prepared and revised in discussion with the members of the Lincolnshire Waste Partnership (LWP). It takes into account feedback received during a period of public consultation undertaken between April and July 2018.

In addition to the endorsement of the LWP as a body, each partner council has adopted this JMWMS through its own formal processes.

1.2 Layout of the document

In addition to this summary, the Strategy includes the following chapters.

- 2. Introduction**
Gives more detailed background information about why we need a new Strategy.
- 3. What are the key legislative drivers?**
Background information which has been taken into account in shaping the Strategy.
- 4. How has the strategy been developed?**
Details of the process followed to develop this Strategy.
- 5. Where are we today?**
An assessment of the Partnership's current services and future needs.
- 6. What are we aiming for?**
Our vision and objectives for what we want to achieve.
- 7. How will we get there?**
Sets out the types of action identified to fulfil our objectives – These will be expanded upon in further detail in a separate Action Plan to be updated annually.
- 8. The next steps: Monitoring, implementing and reviewing the strategy**
How we will check that we are fulfilling our objectives.

This document also includes a number of appendices which give further explanatory details to support the main text. One of these, Appendix D, is the initial Action Plan setting out the work which the LWP will undertake to move forwards with the objectives of this Strategy. As stated elsewhere, the Action Plan will be reviewed annually to ensure that it remains up to date.

1.3 Where are we today? (see Chapter 5)

In order to consider what we would like to achieve and how we might do so, it is important to establish where we are starting from. Chapter 5 sets out detailed information, including:

- An analysis of the nature and performance of existing services;
- The impact of any service changes already firmly planned (if any);
- Projections of future waste quantities; and
- The impact of changes in waste quantities on overall performance if no changes, other than those already firmly planned, are introduced.

This information makes it clear that, whilst we have achieved a lot in recent years, we now face a number of challenges, such as:

- A growing population producing more waste each year;
- Funding from central government decreasing each year;
- A falling recycling rate locally and a stalled rate nationally, whilst the national government is committing to higher targets set by the EU;
- Waste going into the wrong bin – A quarter of what we receive in our recycling collections is not recyclable, whilst a quarter of what we receive in our general waste collections is actually recyclable; and
- Volatile markets for recyclable materials.

1.4 What are we aiming for? (see Chapter 6)

In order to work towards our vision, the Partnership has developed and agreed a set of high-level objectives, which are key drivers for the delivery of this strategy. In line with the vision, each of these objectives is to be considered in the light of the Partnership's shared values that:

All Objectives should ensure that services provided under the Strategy represent the best possible environmental option which gives value for money for Lincolnshire residents.

The ten objectives are as follows:

Objective 1.	To improve the quality and therefore commercial value of our recycling stream.
Objective 2.	To move towards a common set of recycling materials.

Objective 3.	To consider the introduction of separate food waste collections where technically, environmentally and economically practicable.
Objective 4.	To explore new opportunities of promoting waste minimisation and of using all waste as a resource in accordance with the waste hierarchy.
Objective 5.	To contribute to the UK recycling targets of 50% by 2020 and 55% by 2025.
Objective 6.	To find the most appropriate ways to measure our environmental performance, and set appropriate targets.
Objective 7.	To seek to reduce our carbon footprint.
Objective 8.	To make an objective assessment of what further waste processing/disposal capacity is required and, as necessary, secure appropriate capacity.
Objective 9.	To regularly review the LWP governance model in order to provide the best opportunity to bring closer integration and the implementation of the objectives set by the strategy.
Objective 10.	To consider appropriate innovative solutions in the delivery of our waste management services.

1.5 How will we get there? (see Chapters 7 & 8)

In order to achieve these objectives, this Strategy is accompanied by a separate Action Plan, the initial version of which is attached as Appendix D, detailing what will be done when and by whom. The Action Plan will be reviewed and revised annually to ensure that it remains up to date and addresses any new challenges arising during the lifetime of the Strategy.

Chapter 7 sets out some of the themes which are reflected in the action plan:

- **Seeing the wider picture** (see section 7.1)
 - Developing links with other local authorities
 - Engaging with the commercial sector
 - Addressing any waste processing capacity gaps
- **Balancing economic and environmental benefits** (see section 7.2)
 - Ensuring value for money
 - Caring for the environment
 - Finding the balance in practice
- **Reviewing what we collect and how** (see section 7.3)
- **Getting our messages across** (see section 7.4)
 - To those living in Lincolnshire – e.g. What to put in which bin
 - To the national government – Influencing national strategy and policy to tie in with our own
 - To other stakeholders – Parish Councils, Environment Agency, etc.
 - To the commercial sector – To waste producers and waste businesses

Chapter 7 also summarises (see section 7.5) each of the key workstreams which are included in the Action Plan.

We will also (as detailed in Chapter 8) ensure that we keep working to achieve our objectives throughout the lifetime of this Strategy. This will include:

- **Monitoring the strategy** (see section 8.1) – Measuring our performance both in existing ways (such as recycling percentages) and in new ways which better reflect how we are doing compared to our strategic objectives.
- **Implementing the strategy** (see section 8.2) – Ensuring that our work is:
 - Appropriately funded,
 - Done in partnership across the members of the LWP, and
 - Properly focussed through the use of an action plan.
- **Reviewing the strategy** (see section 8.3) – This will, in line with government guidance, happen at least every five years, and will also need to react to changing circumstances such as the UK's departure from the European Union.

2 Introduction

2.1 Background

The Lincolnshire Waste Partnership (LWP) brings together the public bodies within Lincolnshire responsible for collection and disposal of waste, including:

- Seven Waste Collection Authorities (WCA's) – Boston Borough Council, City of Lincoln Council, East Lindsey District Council, North Kesteven District Council, South Holland District Council, South Kesteven District Council and West Lindsey District Council;
- One Waste Disposal Authority (WDA) – Lincolnshire County Council; and
- One Waste Regulatory Authority – The Environment Agency.

This Joint Municipal Waste Management Strategy (JMWMS) provides a strategic framework through which the partners of the LWP can express their shared vision and strategic objectives for the handling of municipal waste. Furthermore, it meets the requirements of the Waste and Emissions Trading Act 2003 to have such a joint strategy.

The LWP's previous Strategy was adopted in 2008, necessitating this review. This new Strategy has been developed as a joint venture between the WDA and the WCA's, with significant commitment from all members of the LWP in order to arrive at a genuinely shared vision and future strategy.

In addition to this main Strategy document, the JMWMS process has produced:

- A Strategic Environmental Assessment (SEA), as required under the Environmental Assessment of Plans and Programmes Regulations 2004. The SEA provides a thorough environmental assessment of a number of scenarios which can deliver the objectives set by the strategy. In accordance with Government guidance, the SEA process, including the preparation of an Environmental Report, has been conducted at the same time as developing the Strategy; and
- An Action Plan of work to be undertaken to move towards the objectives identified in the Strategy. The intention is to update the Action Plan annually for the lifetime of this Strategy.

The initial Action Plan is attached as Appendix D to this document. The SEA Environmental Report is available from the JMWMS web page¹.

2.2 Scope and context

In developing this Strategy, a balance has been sought between reducing costs and "doing the right thing" environmentally. "Doing the right thing" (ideally the "best" thing) involves reference to a number of key documents.

¹ <https://www.lincolnshire.gov.uk/recycle-for-lincolnshire/waste-strategy-for-lincolnshire/>

2.2.1 The Waste Hierarchy

Article 4 of the revised EU Waste Framework Directive lays down a five-step hierarchy of waste management options which must be applied by Member States in this priority order. In order of preference, these options are shown below in Figure 2-1.

Figure 2-1 The Waste Hierarchy



The Waste Hierarchy helps to encourage a change in thinking so that waste is considered as a resource to be made use of, with disposal being the last resort.

Regulation 12 of the Waste (England and Wales) Regulations 2012 asserts the need for us to consider the Waste Hierarchy in choosing how to handle all our waste streams, so this directs the principles under which our Strategy must be written.

It should also be noted that the most preferred options are to prevent things from becoming waste in the first place, or to make it possible to reuse them. This is reflected in our Objective 4 which has now, as described in Section 6.1, been expanded to specifically mention waste minimisation.

2.2.2 UK Policy and Legislation on Waste

This includes the following, further details of which are given in section 3.2 of this Strategy:

- Waste Management Plan for England (2013)
- 25 Year Environment Plan (January 2018)
- Resources and Waste Strategy (due during 2018)

2.2.3 Lincolnshire's Previous Waste Strategy (2008)

Lincolnshire's previous Waste Strategy identified 10 key objectives. Considerable progress has been made on these over the last decade, including:

Objective 5	To increase progressively the recovery and diversion of biodegradable waste from landfill, to meet and exceed the Landfill Directive diversion targets.
Objective 6	To ensure that residual waste treatment supports energy recovery and other practices higher up the waste hierarchy.

Through the building of the new Energy from Waste (EfW) facility in Hykeham, which began receiving waste in 2013, we now send less than 5% of our waste to landfill. This reduced our landfill tonnage so much that we achieved our 2020 Landfill Directive diversion target as soon as the EfW was in full operation, and we have continued to achieve that target in every year since then.



Our EfW facility also ensures that our residual waste is treated higher up the waste hierarchy than landfill.

Objective 7	To deliver best value for money waste management services, addressed on a countywide basis.
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The lifetime of our 2008 Strategy has coincided with a period of unprecedented cuts to the funding which local authorities receive from national government. The LWP authorities have achieved large budget savings during this time, but have continued to provide a high level of service to the public.

Whilst our previous objectives were considered in developing this new Strategy, it is important to note that:

- Some of those objectives have already met – e.g. Objective 5 as described above.
- The new Strategy needs to reflect the changing political landscape – e.g. Financial austerity and the UK's exit from the European Union.
- Changing the focus may help to renew the impetus and impact which have been lost as the previous Strategy has aged.

2.3 What does the waste strategy cover?

This Strategy is intended to fulfil the duty, under the Waste and Emissions Trading Act (2003) that:

"The waste authorities for a two-tier area must... have for the area a joint strategy for the management of... waste from households, and... other waste that, because of its nature or composition, is similar to waste from households"

In preparing this Strategy, in order to ensure a holistic approach and to identify possible synergies, the process also needs to take into account links between:

- The Waste Strategy as a whole and the LWP partner authorities' strategic approach to other related matters, including (but not limited to):
 - Other environmental matters (e.g. Natural Environment Strategy)
 - Public health
 - Economic growth (e.g. Development Plans) and the consequential effects on waste growth.
- Our Waste Strategy and those of neighbouring local authorities, and
- Each individual Objective and all other Objectives within the Strategy.

3 What are the key legislative drivers?

This chapter outlines the main legal requirements for waste management that the Partnership has either already met or will need to meet as new legislation and requirements are introduced. It then considers the legislation regarding planning for any new waste management facilities and services that may be required to enable the Partnership to meet its future targets.

3.1 European waste policy and legislation

The European Union is currently the major source of the UK's environmental legislation and guidance in relation to the management of waste. Whilst, in the longer term, the UK's exit from the European Union may see the UK diverge from EU waste policy and legislation, the UK Government have indicated their intention to continue to comply with EU legislation for the foreseeable future.

A number of European Directives have been introduced which aim to increase levels of recycling and recovery, and thus reduce the amount of waste which is landfilled. A number of these have recently been amended as part of the EU's Circular Economy Package (CEP) which came into force on 4th July 2018. In particular, the CEP includes changes to the Waste Framework Directive and Landfill Directive, both of which are key drivers for the LWP's strategic thinking.

Full details of the CEP are available online, for example on the website of the Council of the EU², but they are summarised below under the following headlines:

- Waste Hierarchy
- Recycling/reuse targets
- Separate collections of specific materials
- Landfill targets

3.1.1 Waste Hierarchy

This provides a framework of how sustainability in waste management can be increased progressively. It is described in detail in Section 2.2.1 of this JMWMS.

3.1.2 Recycling/reuse targets

The UK government is committed to meeting the EU targets for the recycling of "municipal waste" (Table 3-1). However, it should be noted that the definition of this differs from that of the former headline UK recycling rate (National Indicator 192). Indeed, different EU member states measure this in a variety of ways, and the LWP has joined others in lobbying the UK government to consider including the recycling of Incinerator Bottom Ash (IBA) which would considerably boost the LWP's reported recycling rate. Indeed, the reported rate for the UK as a whole already includes the recycling of metals extracted from IBA, whereas the official rate for individual councils does not. Further information regarding this can be found in section 5.5 of this Strategy.

² <http://www.consilium.europa.eu/en/press/press-releases/2018/05/22/waste-management-and-recycling-council-adopts-new-rules/>

Table 3-1 EU recycling/reuse targets

	By 2020	By 2025	By 2030	By 2035
Total reuse and recycling of municipal waste	50%	55%	60%	65%

3.1.3 Separate collections of specific materials

Before the introduction of the CEP there was already a requirement, transposed into UK law, for separate collections of paper, metal, plastic and glass:

- "Where necessary... to ensure that waste undergoes recovery operations... and to facilitate or improve recovery"; and
- "if technically, environmentally and economically practicable" (or "TEEP" for short).

The CEP supplements this with the requirement, subject to the same "TEEP" caveat, for separate collections of:

- "Bio-waste" (including food waste) by 31st December 2023; and
- Textiles and hazardous waste by 1st January 2025.

It remains to be seen how these requirements will be reflected in the new UK Resources and Waste Strategy or transposed into UK law, particularly in the light of the "TEEP" caveat. This should become clearer with the publication of Defra's new Resources and Waste Strategy due towards the end of 2018.

3.1.4 Landfill targets

The UK Government responded to the original EU Landfill Directive both by setting equivalent targets (under the Landfill Allowance Trading Scheme, LATS) for each local authority, and by increasing the cost of landfill through an escalating rate of Landfill Tax, and the UK has achieved the 2020 target well ahead of time. Whilst the LWP's development, under its previous Waste Strategy, of an energy from waste facility brought us well within our LATS targets, the minimisation of our Landfill Tax bill, particularly in the face of predicted population and waste growth, remains a key driver.

3.2 National waste policy and legislation

Much of the UK's waste legislation transposes the above EU legislation. It is currently unclear how Brexit will affect UK legislation in the future, but the UK Government has expressed a desire initially to retain EU-related waste legislation.

Another element of uncertainty surrounds the UK Government's long-anticipated 25 Year Environment Plan which was published in January 2018. Whilst the Plan contains, as described below, some pledges on waste, the promised new Resources and Waste Strategy is anticipated to arrive around the same time as the adoption of this Lincolnshire Strategy. This JMWMS is intended

to be flexible enough to react to any significant changes resulting from that new national strategy, particularly through the commitment to an annual review of the accompanying Action Plan.

3.2.1 Waste Management Plan for England

The 2013 Waste Management Plan for England sets out a number of strategic priorities which need to be taken into account in this Strategy for Lincolnshire. These include:

- Implementing the Waste Hierarchy.
- Measures to promote high quality recycling.
 - The Waste (England and Wales) Regulations 2011, transposing the revised EU Waste Framework Directive, require the separate collection of waste paper, metal, plastic and glass from 2015 onwards wherever separate collection is necessary to get high quality recycling, and is practicable.
 - The Waste and Resources Action Programme (WRAP), will advise local authorities and others, including on best practice in collections.
 - The introduction of Regulations relating to Material Recovery Facilities (MRFs), including mandatory sampling weights and frequencies for inputs and outputs.
- Separate collection of biowaste.
 - The Government has identified anaerobic digestion as the best technology currently available for treating food waste.

3.2.2 UK 25 Year Environment Plan

The government's 25 Year Environment Plan³ was published in January 2018. On the subject of waste it included, on page 29, the following commitment.

We will minimise waste, reuse materials as much as we can and manage materials at the end of their life to minimise the impact on the environment. We will do this by:

- *Working towards our ambition of zero avoidable waste by 2050*
- *Working to a target of eliminating avoidable plastic waste by end of 2042.*
- *Meeting all existing waste targets – including those on landfill, reuse and recycling – and developing ambitious new future targets and milestones.*
- *Seeking to eliminate waste crime and illegal waste sites over the lifetime of this Plan, prioritising those of highest risk. Delivering a substantial reduction in litter and littering behaviour.*
- *Significantly reducing and where possible preventing all kinds of marine plastic pollution – in particular material that came originally from land.*

The Plan includes a statement (page 85) that Defra will be:

Publishing a new Resources and Waste strategy in 2018 aimed at making the UK a world leader in resource efficiency. It will set out our approach to reducing waste, promoting

³ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf

markets for secondary materials, incentivising producers to design better products and how we can better manage materials at the end of life by targeting environmental impacts.

It is currently anticipated that this Resources and Waste strategy will be released in October 2018. Our Strategy Action Plans for future years will need to take this new national strategy into account, particularly with regard to any specific targets which are set.

3.2.3 National Planning Policy

The National Planning Policy Framework (NPPF), introduced in March 2012 and revised in July 2018, sets out the Government's national planning policies for England. This is supported by online Planning Practice Guidance. The overarching aim of the NPPF is to achieve sustainable development by ensuring economic, social and environmental gains are sought jointly and simultaneously through the planning system. At the centre of this is a presumption in favour of sustainable development. The NPPF must be taken into account in the preparation of development plan documents, and is a material consideration in planning decisions. However, whilst the NPPF includes both general policies and specific policies, the specific policies do not extend to waste. Instead, these are set out in the National Planning Policy for Waste (NPPW) (October 2014).

The NPPW sits alongside the National Waste Management Plan (December 2013) and sets out the national framework for planning for waste management. It outlines the planning system's key roles in delivering the new facilities that are essential for implementing sustainable waste management and protecting the environment and human health. The emphasis is on delivering sustainable development, driving waste up the hierarchy, seeing waste as a resource and disposal as the last option.

3.2.4 Other National Strategies

The UK Government has set out several other Strategies which include elements relating to waste management.

- The Industrial Strategy sets out plans:
 - For "moving towards a regenerative circular economy";
 - To "take further measures to strengthen the markets for secondary materials"; and
 - To further develop the "Midlands Engine".
- The Clean Growth Strategy – Includes, under the heading "Enhancing the Benefits and Value of Our Natural Resources", proposals to:
 - "Work towards our ambition for zero avoidable waste by 2050, maximising the value we extract from our resources, and minimising the negative environmental and carbon impacts associated with their extraction, use and disposal";
 - "Publish a new Resources and Waste Strategy";
 - "Explore new and innovative ways to manage emissions from landfill"; and
 - "Invest £99 million in innovative technology and research for agri-tech, land use, greenhouse gas removal technologies, waste and resource efficiency".

3.3 The Lincolnshire Minerals and Waste Local Plan (MWLP)

The County Council has produced the Lincolnshire Minerals and Waste Local Plan under its statutory duties as the Mineral and Waste Planning Authority for the County. Planning law requires that all applications for planning permission for waste development must be determined in accordance with this plan unless material considerations indicate otherwise. This plan is comprised of two parts, each forming a development plan document:

- the Core Strategy and Development Management Policies (CSDMP) document (adopted on 1 June 2016) – which sets out the key principles to guide the future extraction of minerals and the form of waste management development in the County up to 2031, together with the development management policies against which applications for those types of development will be assessed; and
- the Site Locations document (adopted on 15 December 2017), which includes specific proposals and policies for the provision of land for mineral and waste development.

The Strategic Objectives of the plan include:

- protecting the environment and local communities from the negative impacts of waste development, reducing residual impacts and delivering improvements where possible, and ensuring new facilities include high standards of design and layout, sustainable construction methods, good working practices and environmental protection measures;
- through prioritising the movement of waste up the waste hierarchy, minimising greenhouse gas emissions by reducing reliance on landfill, maximising opportunities for the re-use and recycling of waste, facilitating new technologies to maximise the renewable energy potential of waste as a resource, and promoting the use of carbon capture technology; and
- delivering adequate capacity for managing waste more sustainably when it is needed; and ensuring waste is managed as near as possible to where it is produced.

In relation to waste, the plan is based on directing new waste facilities, including extensions, to areas in and around the County's main settlements (Lincoln, Boston, Grantham, Spalding, Bourne, Gainsborough, Louth, Skegness, Sleaford and Stamford) where the highest levels of waste are expected to be generated. The strategy does, however, recognise that some developments are likely to be developed outside these areas, including biological treatment of waste such as anaerobic digestion and open-air windrow composting.

The plan identifies, through the Site Locations document, locations for a range of new or extended waste management facilities to meet the predicted capacity gaps for waste arisings in the County for the period up to and including 2031. This will involve the building of waste management facilities for recycling and an energy from waste facility mainly for the management of Local Authority Collected Waste, and commercial & industrial waste. The plan identifies that facilities for the management of the county's Local Authority Collected Waste are already in place, with any future needs relating to replacement facilities. There is no requirement for further landfill facilities. The need for specialised thermal treatment and hazardous landfill would continue to be met by national facilities outside the county. The plan also safeguards waste management facilities from redevelopment to non-waste uses or from the encroachment of incompatible development.

The plan makes provision to meet the requirement for waste facilities through one site specifically allocated and safeguarded for waste development, and 16 areas (industrial areas) where waste uses are considered acceptable alongside other industrial and employment uses (providing flexibility and choice).

To sum up, the Lincolnshire MWLP provides the spatial context and locational criteria for new waste facilities covering all waste streams. Whilst it sets out the predicted requirement for new facilities, this is only indicative and is used to ensure that sufficient land is available for new waste facilities to meet the capacity gaps. In practise, the LMWLP has allocated far more land for future waste management than will be required in order to allow flexibility. The LWP will therefore need, particularly in considering the need for the development of new waste management facilities, to refer to the Lincolnshire MWLP.

3.4 Relationship with Neighbouring Authorities

Whilst each neighbouring authority was specifically contacted during our Public Consultation on this JMWMS, only a limited number of responses were received. These are shown in Appendix C.

Strong working relationships are required with our neighbouring authorities and, as highlighted by the response from North Lincolnshire Council, we will look for opportunities for joint infrastructure developments where this is mutually beneficial. In developing and implementing our Action Plan, we will seek to identify such opportunities.

We will also seek to continue dialogue with our neighbours once as the UK Government's transposition of the EU Circular Economy package becomes clearer, particularly through Defra's new Resources and Waste Strategy.

4 How has the strategy been developed?

4.1 Background

The previous Joint Municipal Waste Management Strategy for Lincolnshire was published in June 2008.

That Strategy was compiled by following Government guidance on waste management strategies and assessed in accordance with the ODPM guidance 'A Practical Guide to the Strategic Environmental Assessment Directive' (2005).

The Lincolnshire Waste Partnership has identified that a new joint waste strategy and a SEA are required.

4.2 Development of a new waste strategy

The development of this new strategy has also made use of the 2005 guidance from the Office of the Deputy Prime Minister (ODPM). Although this is no longer available online, it is still generally considered to be the most relevant national guidance on the subject.

The guidance sets out three questions which should be answered in developing a Waste Strategy. We have addressed each of these questions as described below.

4.2.1 "Where are we today?"

Chapter 5 summarises the services currently provided by each of the LWP authorities. It also includes an analysis of the quantities of each waste stream and material being handled, and a forecast of future waste quantities.

4.2.2 "Where do we want to get to and when?"

The ODPM guidance describes this as "*the objectives for how waste will be managed more sustainably in the future*". Chapter 6 sets out the LWP's shared objectives, developed and agreed through a series of workshops and meetings early in the Strategy process. Chapter 6 also addresses the main challenges facing the LWP during the period covered by this Strategy.

4.2.3 "What do we need to do to get there?"

Chapter 7 gives an overview of the actions identified by the Partnership as being needed to achieve the objectives of this Strategy. It essentially sets out a 'route map' showing how those objectives will be achieved.

The necessary actions have been set out in more detail in an Action Plan for the first year of the life of this Strategy. This includes details of:

- who will need to do what? and
- by when?

In order to ensure that the Action Plan continues to deliver in future years, a revised version will be produced annually. This will respond to any changes in the ongoing quantity and composition of waste, as well as to any other necessary factors.

4.3 Strategic Environmental Assessment

The Department for Environment, Food & Rural Affairs' (Defra) "Guidance on Municipal Waste Management Strategies" states that "*as a minimum the Strategy should undergo a Strategic Environmental Assessment (SEA).*"

In general, SEA permits analysis of all draft Strategy provisions against a series of environmental objectives. The aim is to ensure the effects of the Strategy are positive with regard to the County's environmental features. Any significant adverse effects identified must be avoided, remedied or mitigated.

In view of this an SEA has been undertaken in parallel with the Strategy process, with both documents feeding into each other as appropriate. The SEA was completed in line with:

- Environmental Assessment of Plans and Programmes Regulations' (SI 2004/1633) 'SEA Regulations'
- Government Guidance on SEA and SA: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

This will include several stages of consultation, initially with statutory consultees (Natural England, Historic England and the Environment Agency) and then alongside public consultation on this Waste Strategy.

4.4 Stakeholder Engagement

In addition to the statutory consultation for the SEA, the Defra guidance on Waste Strategies makes it clear that engaging with various stakeholders is vital to the development of an effective Strategy. Our Strategy process has involved this in a number of ways including the following.

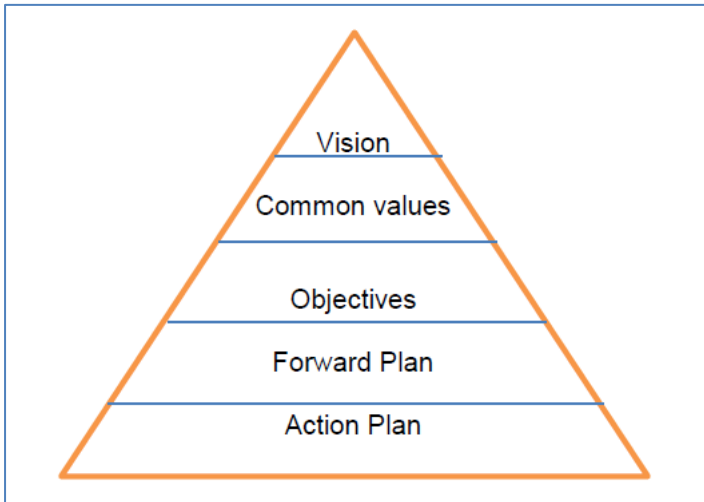
4.4.1 LWP Authorities

The overall objectives and initial proposals for a way to work towards them were developed jointly by the eight authorities of the LWP. This was achieved by holding two workshop sessions in July 2017. Those sessions were facilitated by an independent chair in order to ensure that the views of all partners were captured and given an equal footing.

Full details of the workshops and their outputs can be seen in Appendix A.

Amongst other things, the workshops established an overall framework for how the format of the strategy would lead from the overarching "Vision" to specific practical actions in an "Action Plan".

Figure 4-1 Overall structure of the Waste Strategy



Further engagement with all LWP partners has continued throughout the Strategy process, including through regular LWP meetings, with many partners using formal scrutiny processes to assist in its development, and through formal adoption of the documents at the end.

4.4.2 Public Consultation

A draft version of the JMWMS was made available for a period of 90 days of public consultation between April and July 2018. This final version of the Strategy, and its accompanying Action Plan, reflect the feedback received from the consultation.

Full details of the results of the consultation process are shown in Appendix B of this Strategy.

5 Where are we today?

Before deciding what we want to achieve in the future, and of how we are going to do so, it is essential that we have a proper understanding of our current services and of what waste we are likely to need to deal with during the period covered by this Strategy.

This chapter provides a summary of the necessary baseline information including, as prescribed in Defra's 2005 JMWMS Practice Guide:

- An analysis of the nature and performance of existing services;
- The impact of any service changes already firmly planned (if any);
- Projections of future waste quantities; and
- The impact of changes in waste quantities on overall performance if no changes, other than those already firmly planned, are introduced.

5.1 Demographics

Within the East Midlands Region, Lincolnshire is the largest county covering 592,075 hectares, and the fourth largest in England covering 5% of England.

The following information on the population of Lincolnshire all comes from the Lincolnshire Research Observatory website⁴.

As at the 2011 Census:

- Lincolnshire is a large and sparsely populated county. In England 18% of the population live in rural areas, that is in towns of less than 10,000 people, in villages, hamlets or isolated dwellings. In Lincolnshire the figure is 48%.
- Lincolnshire is home to 306,971 households. The average household is made up of 2.32 persons, similar to the figure of 2.27 for England as a whole.
- Lincolnshire has an ageing population with nearly 21% of its population being over 65 years of age compared to the England figure of just over 16%, with East Lindsey having the highest proportion at 26%.

The population of Lincolnshire grew by over 10% between 2001 and 2011, which is faster than the figure for England of just under 8%. As can be seen in Table 5-1, estimates indicate that Lincolnshire's population continues to grow faster than the national rate for England, by a further 5.3% between 2011 and 2017. Most of our WCA's saw growth between 5.2% and 6.0% (above the national average of 4.9%) during that same period, but it should be noted that population growth in East Lindsey was significantly lower (at 2.4%) and in North Kesteven was significantly higher (at 6.9%).

⁴ <http://www.research-lincs.org.uk/Population.aspx>

Table 5-1 Population estimates

Area	2011 Census	2017 Mid Year Estimate	Growth
Boston BC	64,637	68,500	6.0%
City of Lincoln	93,541	98,400	5.2%
East Lindsey DC	136,401	139,700	2.4%
North Kesteven DC	107,766	115,200	6.9%
South Holland DC	88,270	93,300	5.7%
South Kesteven DC	133,788	141,700	5.9%
West Lindsey DC	89,250	94,300	5.7%
Lincolnshire	713,653	751,200	5.3%
England	53,012,456	55,619,400	4.9%

Forecasts are that population growth for Lincolnshire going forwards (10% higher in 2041 than in 2017) will continue to be a little lower than the average for England. It should be noted, however, that this official estimate doesn't take into account specific housing developments, and the expectation is that the population will grow by more than this. Either way, these extra people are likely to produce a significant amount of additional waste which the LWP will need to collect and dispose of.

5.2 Waste arisings

5.2.1 UK arisings summary

Defra's report "UK Statistics on Waste"⁵ (published February 2018) included the following key points regarding the national situation in 2014:

- The UK generated 202.8 million tonnes of total waste in 2014.
- Over half of this (59%) was generated by construction, demolition and excavation.
- UK generation of commercial and industrial waste in 2014 was 41.9 million tonnes.
- Only 26.8 million tonnes, around 13% of the total, was "waste from households".

Clearly, household waste is a relatively small proportion of overall waste, and needs to be considered in the light of the wider picture.

5.2.2 Current Local Authority Collected Waste (LACW)

As a predominantly rural county, the largest waste stream in Lincolnshire comes from agricultural services which, according to the Waste Needs Assessment produce for the Lincolnshire Minerals and

⁵ <https://www.gov.uk/government/statistics/uk-waste-data>

Waste Local Plan (Site Locations Document)⁶, represents some half of the total waste stream. In comparison, LACW represents around 10% of the total waste arisings in the county.

It should be noted that whilst the County Council is required to consider all waste streams in the development of its Minerals and Waste Local Plan, agricultural waste is largely dealt with at source rather than requiring the County Council's attention in its role as Waste Planning Authority. Furthermore, the Waste and Emissions Trading Act 2003⁷ states in Section 32(1), in defining the duty to have a Joint Municipal Waste Management Strategy, that this Strategy should only cover the management of:

- (a) waste from households, and
- (b) other waste that, because of its nature or composition, is similar to waste from households.

Therefore this Strategy focuses on LACW, which can include waste from the following sources (as defined in the Controlled Waste Regulations 2012):

- Waste from households – This makes up the vast majority of LACW;
- Other "household waste" – e.g. From schools and hospitals;
- **Some** waste from commercial premises (such as shops, offices and restaurants); and
- **Some** waste from construction and demolition (C&D) activities.

Table 5-2 shows the breakdown of LACW across Lincolnshire, with 360,701 tonnes arising in 2017/18 of which around 96% is household waste.

Table 5-2 Summary of Local Authority Collected Waste (LACW) in Lincolnshire 2017/18

Sources: Collection (purple) = County Council Waste Data Management System; Disposal (orange) = Wastedataflow⁸

Waste Stream	2017/18 (Tonnes)	% of Total Waste Stream
Local Authority Collected Waste	360,701	
Waste collected at kerbside by WCA's	274,180	76% of LACW
Other waste collected by WCA's ⁱ	16,289	5% of LACW
Waste collected at HWRC's	69,500	19% of LACW
Other LACW ⁱⁱ	731	<1% of LACW
Total Household Waste collected ⁱⁱⁱ	346,777	96% of LACW
Total Household Waste disposed of ⁱⁱⁱ	346,329	
Household Waste reused, recycled or composted	150,553	44% of Household Waste Disposal
Household Waste sent for energy recovery	179,976	52% of Household Waste Disposal
Household Waste landfilled	13,151	4% of Household Waste Disposal

i – Includes street sweepings, litter, bring banks, trade waste, etc.

ii – Largely consists of waste from charities for which the WDA provides disposal.

iii – Totals collected and disposed of differ due to changes in stock levels at Waste Transfer Stations.

⁶ http://uk.sitestat.com/lincolnshire/lincolnshire/s?Home.residents.environment-and-planning.planning-and-development.minerals-and-waste.site-locations-examination.131110.articleDownload.106584&ns_type=pdf&ns_url=https://www.lincolnshire.gov.uk//Download/106584

⁷ <http://www.legislation.gov.uk/ukpga/2003/33/contents>

⁸ <http://www.wastedataflow.org/>

Figure 5-1 Sources of LACW in 2017/18

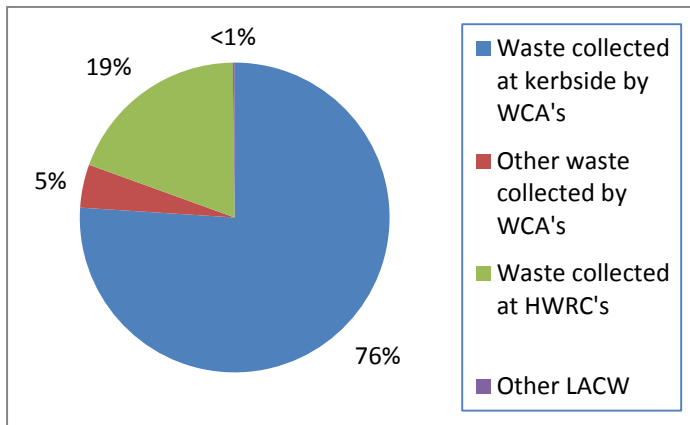
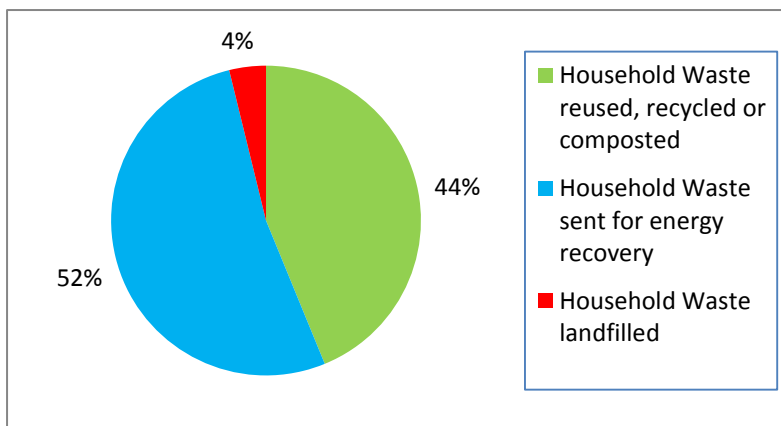


Figure 5-2 Destinations of Household Waste in 2017/18



5.2.3 Waste growth

As was reported in the LWP's previous Waste Strategy, between 2000/01 and 2006/07 the total tonnage of Local Authority Collected Waste (LACW) in Lincolnshire rose by over 13%. Table 5-3 and Figure 5-3 below, however, show that we actually saw a fall in waste thereafter, with only one subsequent year (2016/17) seeing more waste generated than 2006/07.

Table 5-3 Waste growth trends in Lincolnshire between 2007 and 2018

Source: Wastedataflow⁹

Year	Municipal Waste (Tonnes)	% Change	Household Waste	% Change
2006/07	365,537		349,663	
2007/08	352,123	-3.67%	338,676	-3.14%
2008/09	359,798	+2.18%	348,280	+2.84%
2009/10	349,784	-2.78%	336,893	-3.27%
2010/11	355,209	+1.55%	341,886	+1.48%
2011/12	349,736	-1.54%	336,073	-1.70%
2012/13	345,232	-1.29%	335,028	-0.31%

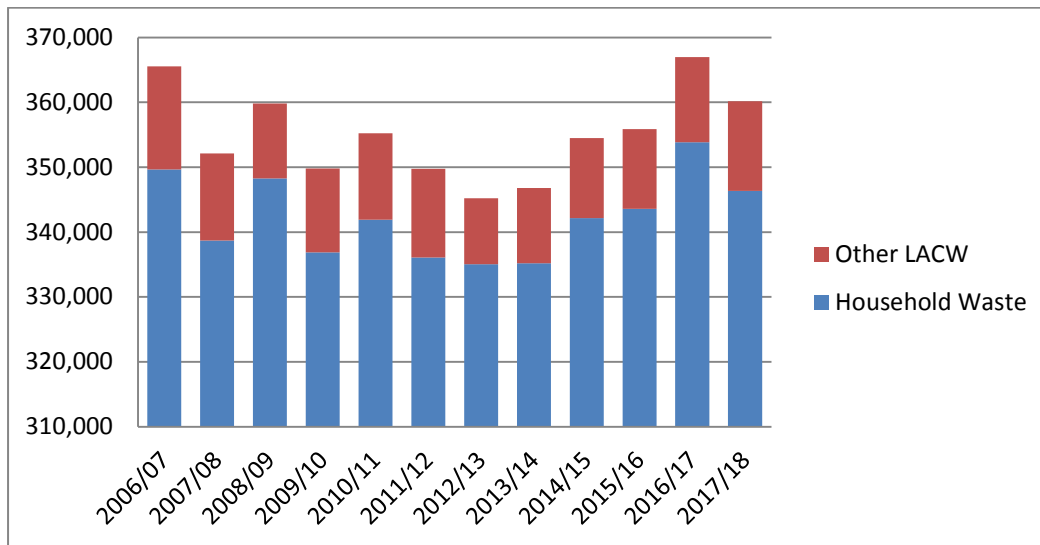
⁹ <http://www.wastedataflow.org/>

Waste Strategy for Lincolnshire

Year	Municipal Waste (Tonnes)	% Change	Household Waste	% Change
2013/14	346,795	+0.45%	335,216	+0.06%
2014/15	354,503	+2.22%	342,132	+2.06%
2015/16	355,849	+0.38%	343,574	+0.42%
2016/17	366,947	+3.12%	353,819	+2.98%
2017/18	360,155 ⁱ	-1.85%	346,329	-2.12%
Overall Change (since 2006/07)		-1.47%		-0.95%

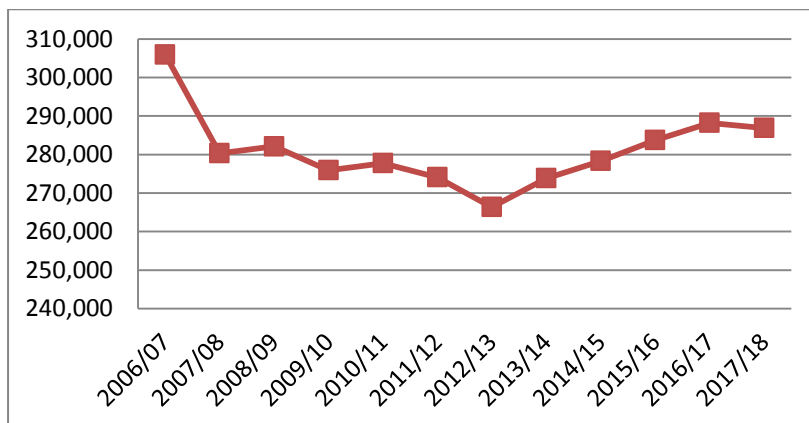
i – The definition of Municipal Waste differs slightly from LACW, so this total is different to that in Table 5-2.

Figure 5-3 Annual Tonnage of LACW in Lincolnshire



It should be noted that the total tonnage has been very erratic, making it difficult to predict any given year. However, closer analysis reveals that much of the variation is due to weather conditions on the quantity of green waste received for composting – e.g. Snow in March 2018 restricted early-Spring growth. Figure 5-4 shows the total tonnage excluding green waste.

Figure 5-4 Annual Tonnage excluding Green Waste



This shows a clearer trend from which conclusions can be drawn:

- Total tonnage fell for several years up to 2012/13, possibly due to the economic downturn making the public less likely to throw things away.
- There has been an upturn in recent years, possibly as the economy picks up again.

In view of the most recent upward trend, and ongoing population growth, it is forecast that LACW arisings will continue to grow. This is in line with the forecasts in the Waste Needs Assessment that accompanies the Lincolnshire Minerals and Waste Local Plan¹⁰ which suggests that LACW tonnages will grow as shown in Table 5-4.

The forecasts consist of a two part assumption:

- 1) That the population will grow by 0.66% per annum; and
- 2) That each person will produce more waste each year.

Whilst the second part may seem a pessimistic assumption, particularly given the fall in waste in 2017/18, over the preceding four years (to 2016/17) waste growth *per person* was around 0.7% per annum.

Table 5-4 LACW growth scenario from Lincolnshire Minerals and Waste Local Plan

	2016 to 2020	2021 to 2031
Population growth	0.66% per annum	0.66% per annum
Waste per head growth	0.5% per annum	0.25% per annum
Total Growth	1.16% per annum	0.91% per annum

These increases are small for any given year, but would represent an increase of over 15% (around 50,000 tonnes of extra household waste) **in** 2031.

5.3 Waste composition

In order to assess the effectiveness of our current waste management services, it is crucial to identify the total quantities collected of each type of waste. Whilst this is relatively simple for separately-collected waste types (e.g. paper in bring banks), the full picture can only be seen by assessing the composition of streams of mixed waste including all of those listed below in Table 5-5.

Ideally, the composition of each of these streams should be identified through detailed analysis of representative samples of real waste which has been collected. However, to do this for all streams would be impractical, so their composition has been measured as shown in Table 5-5.

¹⁰ http://uk.sitestat.com/lincolnshire/lincolnshire/s?Home.residents.environment-and-planning.planning-and-development.minerals-and-waste.site-locations-examination.131110.articleDownload.106584&ns_type=pdf&ns_url=https://www.lincolnshire.gov.uk//Download/106584

Table 5-5 Method of assessing composition of each mixed waste stream

Waste stream	Composition assessed by
Kerbside-collected mixed dry recyclables	Regular sampling and analysis in line with Materials Recycling Facility (MRF) Code of Practice
Kerbside-collected residual/general waste	One-off sampling and analysis undertaken in September 2017
HWRC-collected residual/general waste	Use of Defra-compiled national average figures for HWRC residual waste (most recent available is for 2010/11)
Other streams of mixed waste (e.g. flytipping)	Use of Defra-compiled national average figures for the most appropriate category listed (most recent available is for 2010/11)
Separately-collected (e.g. paper in bring banks)	Composition is known as there is usually only one type of waste in each collection

5.3.1 Kerbside-collected mixed dry recyclables (MDR)

The composition of this waste stream is well known as the Materials Recycling Facility (MRF) Code of Practice requires our MRF contractor to undertake regular sampling and analysis of the material both going into and coming out of their sorting processes.

Figure 5-5 Composition of MDR in 2017/18

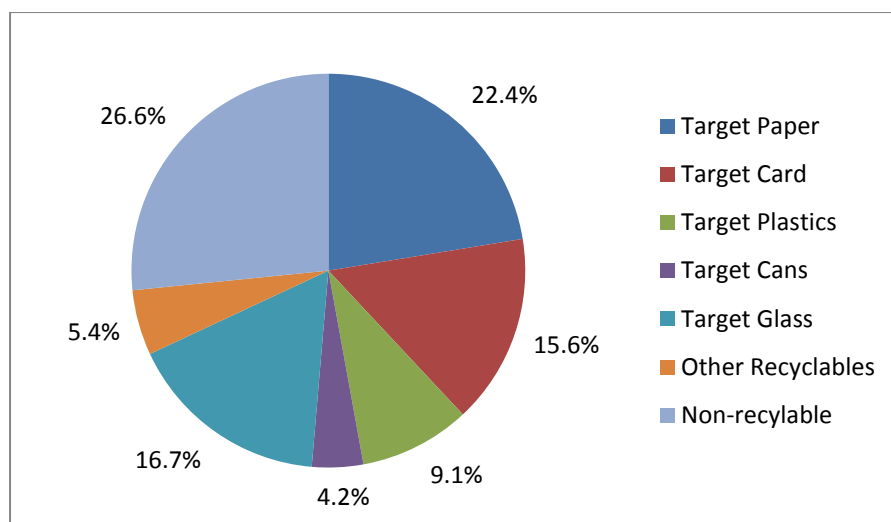


Figure 5-5 summarises the sampling data for 2017/18 and shows that of the total tonnage collected:

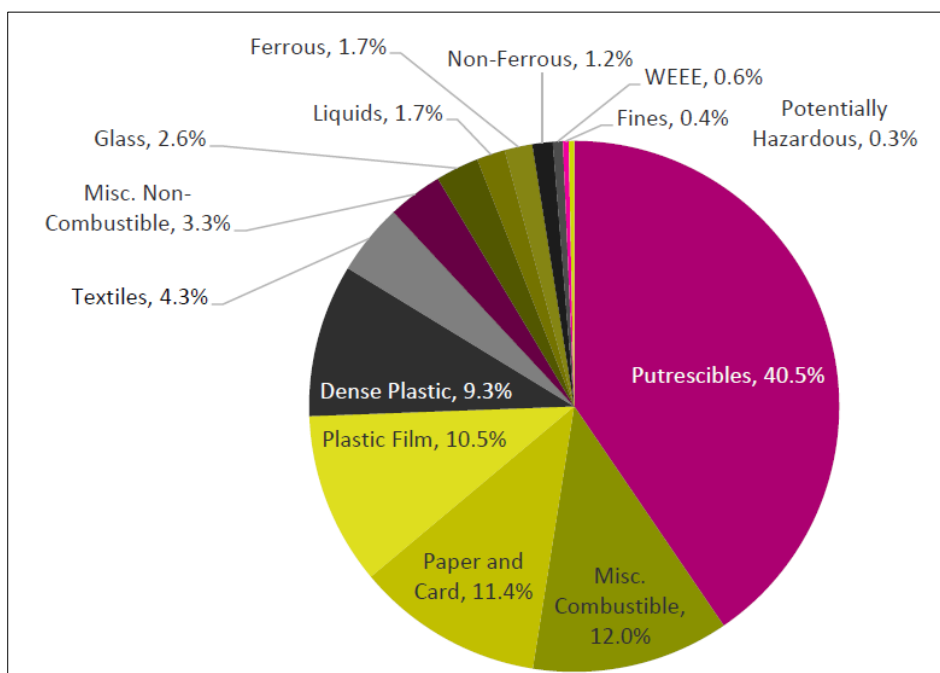
- Around 68% was "target" recyclables – This is what the LWP has asked the public to put into the kerbside recycling collections.
- Around 5% was other recyclables – Whilst not on the specified list, our current MRF contractor is able to recycle these as well. However, this may not be recyclable at all MRF's.
- Nearly 27% was not recyclable – This should not be in these collections, and is addressed in this Strategy.

5.3.2 Kerbside-collected residual/general waste

Since this one waste stream makes up around 40% of the total waste collected by the LWP, a sampling exercise was undertaken in September 2017 to establish what materials are contained in it. This involved using socio-economic data to identify an individual round in each WCA area which represented, as closely as possible, that Council's area as a whole. A random sample of waste from each of those seven rounds was then analysed.

Figure 5-6 shows collated data for the county as a whole. The percentages were calculated by multiplying the figures for each WCA by the total tonnage they collected in 2016/17 since those collecting a higher tonnage collect a higher proportion of the overall waste stream.

Figure 5-6 Composition of Residual Waste in 2016/17



Many of the categories listed are self-explanatory but the largest two are:

- "Putrescibles" = Mostly food waste
- "Misc. Combustible" = Mostly nappies and sanitary products

More detailed headlines from the sampling exercise were that the overall composition includes:

- Around 15% home-compostable food – e.g. Vegetable peelings;
- Around 13% other food – e.g. cooked food, meat and dairy products; and
- Nearly 20% materials which the LWP already collect at kerbside either for recycling or composting.

5.3.3 Overall composition

Combining data from all these individual waste streams, Table 5-6 summarises the calculated overall composition of the waste collected by each of the main methods during 2017/18. Table 5-6 also

shows the overall composition of all LACW in 2017/18, calculated by adding all the mixed-stream totals to the quantities of each waste type collected separately (e.g. from bring banks). For consistency, the waste type groups listed are those used in the 2017 kerbside residual waste sampling exercise.

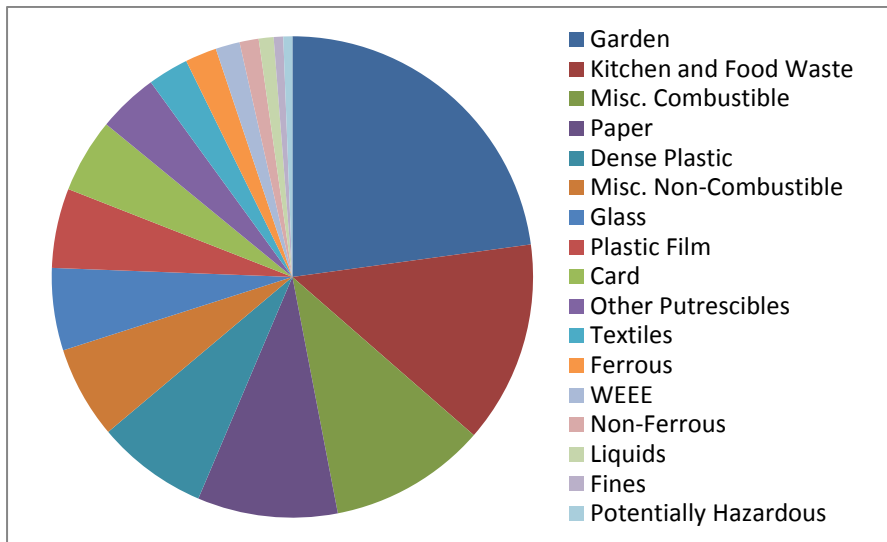
Table 5-6 Tonnage of each waste type collected by each method in 2017/18

	Kerbside Collections ⁱ	Household Waste Recycling Centres	Other Local Authority Collected Waste	TOTAL Local Authority Collected Waste	% of Local Authority Collected Waste
Card	15,276	2,103	574	17,953	5.0%
Paper	31,713	1,252	933	33,898	9.4%
Plastic Film	18,155	727	358	19,240	5.3%
Dense Plastic	22,636	3,790	504	26,930	7.5%
Textiles	7,299	1,946	602	9,847	2.7%
Glass	16,010	875	3,036	19,921	5.5%
Ferrous	4,993	2,444	189	7,626	2.1%
Non-Ferrous	3,468	1,009	148	4,624	1.3%
Misc. Combustible	19,999	17,197	831	38,028	10.6%
WEEE	1,034	4,707	114	5,856	1.6%
Potentially Hazardous	527	1,544	110	2,181	0.6%
Misc. Non-Combustible	5,621	13,416	3,279	22,316	6.2%
Kitchen and Food Waste	47,119	586	1,145	48,851	13.6%
Garden Waste	62,498	17,308	2,424	82,230	22.8%
Other Putrescibles	14,086	369	158	14,613	4.1%
Fines	598	226	1,473	2,298	0.6%
Liquids	2,903	0	691	3,593	1.0%
TOTALS	273,934	69,500	16,570	360,005	

i – Includes collections of residual, recyclables and garden waste.

Figure 5-7 shows the overall composition of LACW from 2017/18 with the waste types ordered from highest to lowest percentage.

Figure 5-7 Overall composition of LACW in 2017/18



Points to note regarding all the above data include that:

- Between them, kerbside collections and HWRC's account for around 95% of our LACW, so the composition of other streams hasn't been examined in detail.
- The largest waste type which is not currently collected for recycling or composting is kitchen and food waste. Details of the proportion of the total for each waste type (including what is collected mixed in with general waste) is currently recycled or composted is shown in Section 5.5.

5.4 Current Waste Management

The current waste management infrastructure needs to be reviewed to provide a baseline on which to develop the Waste Strategy. This review focuses on:

- Waste collection services
- Waste transfer and logistics
- Recycling and composting arrangements
- Treatment and disposal of residual waste
- Existing contracts for all of the above
- Service performance measures
- Current waste management costs

5.4.1 Waste Collection Services

Within Lincolnshire it is the district, borough and city councils (as WCA's) that have the responsibility to collect waste from households, and the County Council (the WDA) that has the responsibility to dispose of it, as well as to operate HWRCs.

Kerbside collections – collections by/for WCAs

Table 5-7 below provides a summary of the current kerbside collection services offered by each WCA.

All authorities that are using wheelie bins for their residual waste collection have a “no side waste policy” in place. This means that, apart from specific exceptions (e.g. just after Christmas), residents are not allowed to place other wastes (e.g. sacks) alongside their wheelie bins. South Holland operates a sack collection system and will collect side waste.

It should be noted that, as part of Defra's consistency agenda, WRAP are seeking to establish whether a national standard set of bin colours would help to make things clearer for the public and thus increase recycling rates¹¹. In view of this, any consideration of a more standardised approach for Lincolnshire should take account of the feedback from that work. However, in the absence of any additional government funding, it is unlikely that bins will be replaced sooner than at the end of their natural lifetime.

¹¹ <https://www.letsrecycle.com/news/latest-news/wrap-consults-on-national-colour-scheme-for-bins/>

Table 5-7 Kerbside collection services offered by each Waste Collection Authority (WCA)

The following indicates the service provided to the majority of households by each WCA. Colour shading shows the colour of bin provided for each service.

Unless otherwise stated, collections are provided using a wheelie bin and fortnightly/alternate weekly collections (AWC).

Waste Collection Authority	Residual Waste	Mixed Dry Recyclables	Green Waste
Boston Borough Council	AWC in 240 litre bins	AWC in 240 litre bins	AWC in 240 litre bins Charged service No service in Winter
City of Lincoln Council ⁱ	AWC in 240 litre bins	AWC in 240 litre bins	AWC in 240 litre bins Charged service
East Lindsey District Council	AWC in 180 litre bins (240 litre for larger families)	AWC in 240 litre bins	AWC in 240 litre bins Charged service Reduced service in Winter
North Kesteven District Council ⁱⁱ	AWC in 240 litre bins	AWC in 240 litre bins ⁱⁱⁱ	AWC in 240 litre bins Charged service
South Holland District Council	Weekly collection in sacks	Weekly collection in sacks	AWC in 240 litre bins Charged service
South Kesteven District Council	AWC in 240 litre bins	AWC in 240 litre bins	AWC in 240 litre bins Charged service
West Lindsey District Council	AWC in 180 litre bins ^{iv} (240 litre for larger families)	AWC in 240 litre bins ^{iv}	AWC in 240 litre bins Charged service No service in Winter

i – City of Lincoln have alternative arrangements for higher-density inner city areas, using 140 litre bins, communal bins or sacks as appropriate, some of which (mainly residual waste) are collected weekly.

ii – North Kesteven – Since 2009 new builds receive, as standard, a 180 litre bin for residual waste and a 360 litre bin for MDR.

iii – Black wheelie bin with green lid

iv – Around 2,000 WLDC terraced properties receive a weekly sack collection instead of wheelie bins

Table 5-8 Current Collection Contract Arrangements

WCA	How collections are provided
Boston BC	Service provided in-house
City of Lincoln	Contract with Biffa
East Lindsey DC	Service provided in-house
North Kesteven DC	Service provided in-house
South Holland DC	Service provided in-house
South Kesteven DC	Service provided in-house
West Lindsey DC	Service provided in-house

Every household in every WCA area receives a residual waste collection. Table 5-9 summarises the number of households in each WCA area that are currently provided with kerbside recycling and green waste collections.

Table 5-9 Households receiving recycling/green waste kerbside collection in 2017/18

	Boston	East Lindsey	Lincoln	North Kesteven	South Holland	South Kesteven	West Lindsey
Dwelling Stock	29,360	68,060	45,220	50,270	40,070	63,050	42,660
Number of HH – dry recyclables	ALL	ALL	44,300	ALL	ALL	ALL	ALL
Number of HH – green waste ⁱ	7,648	29,053	16,355	30,800	3,155	28,324	39,660

i – Green waste collection numbers are lower because they are a charged-for, opt-in service.

Bring banks for recyclables – collections by/for WCAs

Many of our WCAs currently operate a network of bring banks placed in various locations to receive recyclable material. The County Council either arranges and pays for the recycling of this material, or pays Recycling Credits to each WCA for it.

Bulky household waste – collections by/for WCAs

Bulky waste falls outside the scope of the regular WCA kerbside collection service as these items are generally too large or too difficult to be handled by the normal means. The WCAs across the Partnership offer bulky waste collection on demand for item such as furniture, mattresses and large household appliances. Each district has its own policy on charging for these collections.

Commercial waste – collections by/for WCAs

Currently Boston Borough Council, South Kesteven District Council and West Lindsey District Council operate collections of commercial waste from business premises, and other WCAs are considering doing so. The Strategy, through its ongoing Action Plans, should consider whether it would be appropriate to have a common policy.

Street cleansing – collections by/for WCAs

Each WCA provides a regular service across their area. Busy places, such as shopping precincts and high streets usually have permanent cleaning staff or daily cleansing regimes. General waste such as litter is handled in the same way as other residual waste, but road grit from street sweepers is kept separate as the County Council has separate arrangements in place for the recycling of it.

Abandoned and end of life vehicles – collections by/for WCAs

Abandoned vehicles that are on public land are removed in accordance with the relevant legislation by each district within its area, and then the County Council arranges for disposal where necessary.

Fly tipped waste – collections by/for WCAs

Fly tipping is a serious national problem. As well as being unsightly, it can lead to serious pollution of the environment and harm to human health, and is costly to remove and dispose of correctly. Most fly tipped waste is handled in the same way as residual waste, and all WCAs have enforcement policies which inform the process by which offenders will be investigated and prosecuted.

Clinical waste – collections by/for WDA

The Controlled Waste Regulations 2012 define this type of waste:

“clinical waste” means waste from a healthcare activity (including veterinary healthcare) that—

(a) contains viable micro-organisms or their toxins which are known or reliably believed to cause disease in humans or other living organisms,

(b) contains or is contaminated with a medicine that contains a biologically active pharmaceutical agent, or

(c) is a sharp, or a body fluid or other biological material (including human and animal tissue) containing or contaminated with a dangerous substance within the meaning of Council Directive 67/548/EEC on the approximation of laws, regulations and administrative provisions relating to the classification, packaging and labelling of dangerous substances(b),

and waste of a similar nature from a non-healthcare activity.

The WDA arranges for both the collection and disposal of waste in categories (a) and (b) above. The WCAs collect items in category c.

Household Waste Recycling Centres – collections by/for WDA

The County Council operates 11 HWRCs across the county to which residents can bring their household waste. Tables 5-10 and 5-11 below summarises respectively:

- Table 5-10 – The location of and contractual arrangements for each HWRC; and
- Table 5-11 – The facilities provided at each HWRC.

Table 5-10 HWRC Contractual and Operational Arrangements

Unless stated otherwise, opening hours are standardised as 09:00hrs to 16:00hrs Friday, Saturday, Sunday and Monday (closed Tuesday, Wednesday and Thursday).

NB – All sites are closed on 25th and 26th December and 1st January every year.

Location	Site Ownership	Operated by	Opening hours
Lincoln HWRC Great Northern Terrace LN5 8LG	County Council	Carl Drury Ltd.	09:00hrs to 16:00hrs 7 days a week
Boston HWRC Bittern Way PE21 7RQ	County Council	Carl Drury Ltd.	09:00hrs to 16:00hrs 7 days a week
Spalding HWRC West Marsh Rd PE11 2BB	County Council	Carl Drury Ltd.	Summer (1st April to 31st October) 08:00hrs to 16:00hrs 7 days a week. Winter (1st November to 31st March) 08:00hrs to 16:00hrs Friday, Saturday, Sunday and Monday.
Gainsborough HWRC Long Wood Road, Corringham Road Ind Est, Gainsborough, DN21 1QB	County Council	Carl Drury Ltd.	Standard (09:00hrs to 16:00hrs Friday, Saturday, Sunday and Monday)
The Rasens HWRC Gallamore Lane Industrial Estate, Gallamore Lane, Middle Rasen, LN8 3HA	County Council	Carl Drury Ltd.	Standard
Bourne HWRC South Fen Road PE10 0DN	County Council	Recycle It Wright Ltd.	Standard
Grantham HWRC Mowbeck Way NG31 7AS	County Council	Recycle It Wright Ltd.	Standard
Sleaford HWRC Pride Parkway NG34 8GL	County Council	Recycle It Wright Ltd.	Standard
Louth HWRC Bolingbroke Road LN11 0WA	County Council	Sid Dennis & Sons Ltd.	Standard
Skegness HWRC Warth Lane PE25 2JS	County Council	Sid Dennis & Sons Ltd.	Standard
Kirkby on Bain HWRC Tattershall Road LN10 6YN	FCC Environment	FCC Environment	Standard

Table 5-11 – Materials accepted at Household Waste Recycling Centres as of April 2018

HWRC Site	Residual waste	Green	Wood	Plastics	Paper	Cardboard	Mattresses	WEEE	Books & CDs	Textiles	Household Chemicals	Glass bottles/jars	Cooking Oil	Mineral Oil	Lead Acid Batteries	Household batteries	Plasterboard	Soil	Rubble	Pressurised Gas Cylinders ¹	Scrap Metal	Re-use
Bourne	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x ¹	x	x
Boston	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x ¹	x	x
Gainsborough	x	x	x	x	x	x	x	x	x	x	x	x	x	x	ii	x	x	x	x	x ¹	x	x
Grantham	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x ¹	x	x
Kirkby on Bain	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x ¹	x	x
Lincoln	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x ¹	x	x
Louth	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x ¹	x	x
Rasens	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x ¹	x	x
Skegness	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x ¹	x	x
Sleaford	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x ¹	x	x
Spalding	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x ¹	x	x

An "x" indicates that the stated waste stream is collected separately at the stated HWRC.

- i) Gas cylinders are accepted where necessary, but should ideally be returned to a gas supplier, particularly as a deposit refund is sometimes available.
- ii) Lead acid batteries are no longer accepted at Gainsborough due to repeated security issues. Residents are recommended to contact a scrap dealer.

5.4.2 Waste Transfer and Logistics

Some waste streams are delivered directly to an appropriate treatment or disposal site. For the majority of waste streams, LCC provides a number of Waste Transfer Stations (WTSs) to receive waste both from WCA collections and from HWRCs, enabling the waste to be bulked up for transportation to centralised destinations.

Some WCAs use more than one WTS depending on where waste is collected and/or what type of waste it is. Likewise, many of these WTSs receive waste from more than one WCA or HWRC.

WTSs operated by Lincolnshire County Council

The WDA directly operates a network of five WTSs around the County. Table 5-12 shows the location of each WTS, as well as the tonnage of each type of waste received at each site.

The WDA lets contracts for the transportation of waste from each WTS to the appropriate destinations.

Table 5-12 Location and 2017/18 tonnage throughput for WDA WTSs

Location	Residual Waste (Tonnes)	Mixed Dry Recyclables (Tonnes)	Road Grit (Tonnes)	Other (Tonnes)	TOTAL (Tonnes)
Boston WTS Slippery Gowt Lane PE21 7AA	42,722	7,423	986		51,131
Gainsborough WTS Marshall Lane DN21 1GD	15,697	8,162	1,652		25,512
Grantham WTS Occupation Road NG32 2BP	28,376	13,086	1,305		42,767
Louth WTS Bolingbroke Road LN11 0WA	31,471	10,982	1,733	Glass = 622Te Mattresses ⁱ = 1Te	44,809
Sleaford WTS Pride Parkway NG34 8GL	14,428	5,652	954	Mattresses ^j = 26Te	21,060

i – Mattresses are often delivered in in loads of mixed residual waste. This is the weight of mattresses which were delivered (and weighed) separately.

Other WTSs used by the Lincolnshire Waste Partnership

Arrangements are in place for the use of several other WTSs owned and operated by third parties. Details are shown in Table 5-13.

Table 5-13 Location and 2017/18 tonnage throughput for third party WTSs

Location	Operator	Arranged by	Mixed Dry Recyclables (Tonnes)	Green Waste (Tonnes)
Hykeham	Mid UK Recycling	Lincs CC	13,600	
Market Deeping	Mid UK Recycling	Lincs CC	10,500	2,600
Boston	Mick George	Boston BC		4,200

5.4.3 Recycling and composting arrangements

Green waste

There is generally no need for the use of WTSs for green waste as, both from kerbside collections and from HWRCs, it is sent directly to a network of composting facilities across the county under contracts operated by the County Council. In 2017/18 72,619 tonnes of green waste was sent to these facilities, which are identified in Table 5-14.

Table 5-14 Current Composting Facilities

Composting operator	Location(s)
Clarkeson Recycling	Riby
Greenaway	Alford
Land Network (Gainsborough)	Sturgate
Land Network (Melton)	Melton Mowbray
Land Network (N.E.Lincs)	South Elkington
Material Change	Crowland
MEC Recycling	Swinderby / Saxilby
Mid UK Recycling	Caythorpe / Colsterworth

Mixed dry recycling

All the WCAs operate a kerbside collection of mixed dry recyclables (MDR) which includes a wide range of materials. Historically each WCA has accepted a different mix of materials but the Partnership has identified that it would like to move towards a more standardised recyclable stream where possible. The benefits of such standardised collections include:

- Making the service easier to understand and thus, in line with our strategic vision, more "customer friendly"; and
- Acting in line with the government's "consistency" agenda which seeks to reduce the number of different recycling systems in place across the UK.

As part of the implementation of this JMWMS, the LWP will be working together towards this aim. At the time of writing, discussions are progressing well towards agreement on a common recycling mix. Once agreed, any changes will be publicised through a unified communications campaign using a wide range of methods and media.

In September 2018 the LWP agreed to focus on those materials which should not be deposited in recycling collections. These materials will never be part of the recycling mix, and thus can be the

subject of communications regardless of any future changes to that mix. Figure 5-7 shows the publicity to be used, in most areas as stickers to go onto recycling bins.

Figure 5-7 "No Thanks" bin sticker



The County Council has a contract for the processing of this MDR at Materials Recycling Facilities (MRF's) located in the county. Once collected, each WCA delivers their MDR either to one or more of the WTS's provided by the County Council, or directly to the MRF contractor.

Other dry recycling

Separately-collected recyclables from WCA bring banks and from HWRC's go to a number of different destinations under a variety of different arrangements.

5.4.4 Treatment and disposal of residual waste

The LWP's 2008 Waste Strategy included two Objectives which focussed on residual waste:

Objective 5 – To increase progressively the recovery and diversion of biodegradable waste from landfill, to meet and exceed the Landfill Directive diversion targets.

Objective 6 – To ensure that residual waste treatment supports energy recovery and other practices higher up the waste hierarchy.

In line with these objectives we have, during the lifetime of that Strategy, moved almost entirely from sending residual waste to landfill to using the new Energy from Waste facility at Hykeham. Indeed, we have done this so successfully that the majority of landfill sites in Lincolnshire either have already closed or are likely to close in the near future. Further information regarding this is shown in Table 5-15.

Table 5-15 Residual Waste Contracts 2017

Site Type	Site	Operator	2016/17 Input by LWP (Tonnes)	Contract Details
Energy from Waste	Hykeham	FCC Environment	162,716	Ends 2039
Landfill	Colsterworth	FCC Environment	6,738	Closing 2018
Landfill	Kirkby on Bain	FCC Environment	5,511 ⁱ	Final cell, and will close once filled
Landfill	Leadenham	FCC Environment	0	Site mothballed Reopening in 2018
Landfill	Whisby	FCC Environment	0	Site mothballed Future use to be determined

i – Includes around 1,400 tonnes of rubble from HWRCs.

Given the limited future availability of landfill, the high cost of landfill tax, and that landfill sits at the bottom of the Waste Hierarchy, it seems sensible that the LWP aspires in the long term to send zero waste to landfill.

This aspiration, and the fact that the Hykeham EfW does not have the capacity to process the forecasted quantities of residual waste, are reflected in one of our key objectives:

Objective 8.	To make an objective assessment of what further waste processing/disposal capacity is required and, as necessary, seek to secure appropriate capacity.
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5.5 Service performance measures

Whilst the statutory reporting of National Indicators was removed in 2011, the percentage of household waste sent for reuse, recycling or composting (former NI 192) remains a generally accepted headline measure of the performance of local authority waste and recycling services.

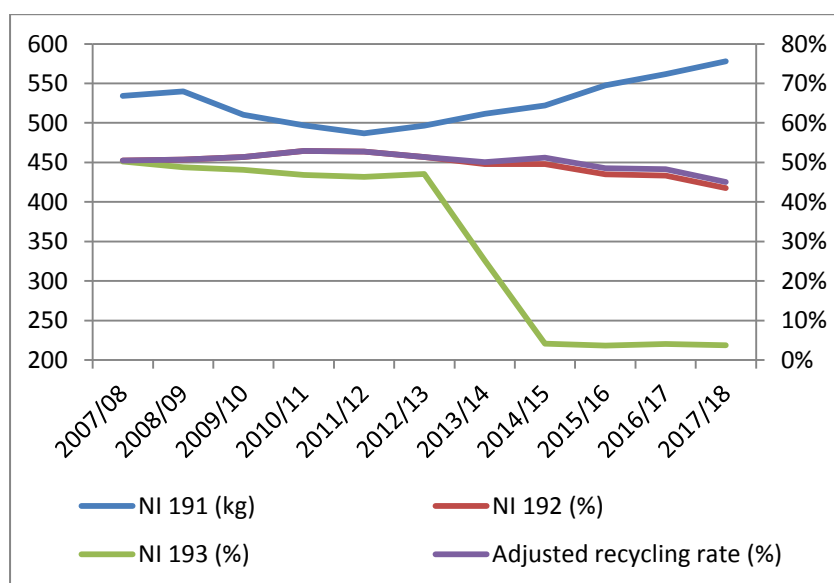
Table 5-16, and the accompanying Figure 5-9, show the County Council's (and thus the LWP's) overall performance against all three of the waste-related former National Indicators:

- NI 191 = Residual Household Waste per Household
- NI 192 = Percentage Household Waste sent for Reuse, Recycling or Composting
- NI 193 = Percentage of Municipal Waste Sent To Landfill

Table 5-16 National Indicator (NI) performance since 2007/08

	2007/08		2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18
NI191: Residual Household Waste kg per Household	534.1		496.8	486.7	496.7	511.4	522.0	547.6	561.9	578.0
NI192: % HH waste sent for Reuse, Recycling or Composting	50.5		52.9	52.8	51.3	49.6	49.6	47.0	46.7	43.5
NI193: % Municipal Waste Sent To Landfill	50.2		46.8	46.4	47.1	25.2	4.1	3.6	4.0	3.8

Figure 5-9 National Indicator (NI) performance since 2007/08



In addition to the three National Indicators, Figure 5-9 also shows an additional measure for recycling performance. Defra have recently announced that the overall UK recycling rate (as reported to the EU) will be measured in a different way. In line with practice in a number of other EU nations, the national rate will include metals recycled from Incinerator Bottom Ash (IBA) such as that generated at our EfW facility. Since this is the basis on which the UK's performance will be measured against the EU target of 50% recycling by 2020, it seems appropriate to record the LWP's performance on the same basis in addition to the official NI192 rate.

Table 5-17 shows this higher recycling percentage alongside our official performance. It should be noted that our recycling rate on that basis would have been around 1.5% higher each year since our EfW facility opened in 2013.

Table 5-17 Increased recycling performance by inclusion of metals recycled from EfW ash

	2007/08		2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18
NI192: Percentage HH waste sent for Reuse, Recycling or Composting	50.5%		52.9%	52.8%	51.3%	49.6%	49.6%	47.0%	46.7%	43.5%
Adjusted recycling rate (including metals from EfW ash)	50.5%		52.9%	52.8%	51.3%	50.0%	51.2%	48.5%	48.3%	45.0%

5.5.1 Quantity of residual waste (NI191)

Following the introduction of our 2008 Strategy, the weight of residual (non-recycled) waste produced by each household fell significantly. Indeed, the 486.7kg per household which we achieved in 2011/12 was equivalent to 225.8kg per head, which was well on target for achieving our 2008 Waste Strategy Objective of 225kg per head by 2020.

Unfortunately this downward trend ended at that point and we have seen a steady increase to a level even higher than in 2008, with the present figure of 578kg equating to around 261kg per head of residual waste. Although the fall and subsequent rise may partly be a result of the global economic downturn (people buy less and thus throw away less when times are financially difficult) and the subsequent recovery, this is a trend that needs reversing.

Table 5-18 Residual and total waste vs recycling rate in 2017/18

	Residual household waste per household (NI191)	Total household waste collected per person (BV84)	Household waste reused, recycled or composted (NI192)
Boston BC	597kg	395kg	35.2%
City of Lincoln	507kg	359kg	35.1%
East Lindsey DC	456kg	384kg	42.1%
North Kesteven DC	521kg	405kg	43.9%
South Holland DC	562kg	331kg	27.2%
South Kesteven DC	506kg	381kg	40.9%
West Lindsey DC	514kg	430kg	46.0%
LWP Total (WCA's + HWRC's)ⁱ	578kg	461kg	43.5%
<i>2016/17 LWP Total</i>	<i>562kg</i>	<i>478kg</i>	<i>46.7%</i>

i – The LWP total weight is higher than that for the individual WCA's as each WCA figure doesn't include waste collected from their residents at County Council HWRC's.

It is interesting to note that the two WCA's with the lowest overall recycling rate also have the lowest total waste per person, particularly since the Waste Hierarchy (see section 2.2.1 for details) makes it clear that waste prevention should have a higher priority than recycling.

5.5.2 Recycling performance (NI192)

It is clear from the above data that the LWP's headline recycling rate has been in slow decline since a peak of 52.9% in 2010/11. This fall in recycling has been accompanied by an increase in the quantity of residual waste to be disposed of.

Table 5-19 shows the recycling and composting performance of each Waste Collection Authority and across the HWRC network during 2017/18.

Table 5-19 Recycling and composting performance in 2017/18

	Household waste reused, recycled or composted (NI192)	Household waste recycled (BV82a)	Household waste composted (BV82b)
Boston BC	35.2%	19.6%	15.6%
City of Lincoln	35.1%	19.1%	16.1%
East Lindsey DC	42.1%	20.1%	22.0%
North Kesteven DC	43.9%	19.1%	24.9%
South Holland DC	27.2%	22.0%	5.2%
South Kesteven DC	40.9%	22.4%	18.5%
West Lindsey DC	46.0%	18.1%	27.8%
LWP Total (WCA's + HWRC's)ⁱ	43.5%	22.2%	21.2%
<i>2016/17 LWP Total</i>	<i>46.7%</i>	<i>24.4%</i>	<i>22.3%</i>

i – The overall LWP recycling performance is higher than that for most of the individual WCA's as each WCA figure doesn't include waste recycled by their residents at County Council HWRC's.

The headline figure of 43.5% for the LWP as a whole shows a considerable fall compared to the 2016/17 figure of 46.7%. Two factors have particularly contributed to this fall:

- Composting – Around 5,000 tonnes less garden waste was presented to us. Since we received some 7,000 tonnes less waste in all, it seems possible that weather conditions have generated less garden growth. This is not unprecedented, but the extra composting could have boosted our recycling rate by around 0.8%.
- Recycling – Compositional analysis shows that we continue to see an increased amount of non-recyclable waste presented in our collections of Mixed Dry Recyclables. This is combined with a fall of over 2,500 tonnes in the total quantity presented in those collections.

Whilst the Government no longer sets targets for individual authorities, it should be noted that the UK is currently committed to meeting the EU recycling targets including 50% by 2020 and 65% by 2035. However, there are uncertainties over this as:

- The impact of the UK's exit from the EU is unclear at the time of writing, although it would currently appear that the UK will retain this overall target in some form; and

- Four different calculation methods are available to EU members, and none of these matches exactly with the UK's former NI 192. At least one of the alternatives could significantly improve the headline recycling rate for the LWP as shown in Figure 5-9 and described beneath it.

5.5.3 Landfilling performance (NI193)

The main success story during the period of the previous Waste Strategy has been in the way in which we dispose of residual waste, with the percentage of Municipal Waste sent to landfill (NI 193) falling from over 50% in 2007/08 to under 4% in 2017/18. This has been driven by:

- The LWP's commitment to move waste further up the EU Waste Hierarchy; and
- The need to reduce the County Council's annual spend on Landfill Tax.

This success has been achieved through two major initiatives:

- 1) The opening of the new Energy from Waste facility in Hykeham. This now diverts over 150,000 tonnes per annum from landfill, and thus moves it up the Waste Hierarchy from "disposal" to "recovery". The facility has recently received Planning Permission to increase capacity to 170,000 tonnes per annum.
- 2) The recycling of road grit. This diverts around 4,000 tonnes per annum from "disposal" to "recycling".

5.5.4 Recycling capture rate for each waste type

One way to identify areas in which recycling performance can be improved is to consider the proportion of the total quantity collected of each material (as listed in section 5.3.3, Table 5-6) which is captured for recycling. This is shown below in table 5-20.

Table 5-20 Recycling capture rate for each waste stream in 2017/18

Key

Green = Above 70%

Yellow = Above 50%

Red = Below 20%

	TOTAL Local Authority Collected Waste	Tonnage Reused, Recycled or Composted	Percentage Reused, Recycled or Composted
Card	17,953	12,325	68.7%
Paper	33,898	17,740	52.3%
Plastic Film	19,240	580	3.0%
Dense Plastic	26,930	8,145	30.2%
Textiles	9,847	1,025	10.4%
Glass	19,921	14,528	72.9%
Ferrous	7,626	4,322	56.7%
Non-Ferrous	4,624	2,284	49.4%

	TOTAL Local Authority Collected Waste	Tonnage Reused, Recycled or Composted	Percentage Reused, Recycled or Composted
Misc. Combustible	38,028	10,220	26.9%
WEEE	5,856	4,419	75.5%
Potentially Hazardous	2,181	1,035	47.5%
Misc. Non-Combustible	22,316	14,419	64.6%
Food	48,851	0	0.0%
Garden	82,230	72,619	88.3%
Other Putrescibles	14,613	0	0.0%
Fines	2,298	0	0.0%
Liquids	3,593	0	0.0%
TOTALS	360,005	163,661	

The capture rate for WEEE (electricals), glass and garden waste exceeds 70%. Several other streams exceed 50% recycling: paper, card, ferrous metals, and "miscellaneous non-combustible" (which includes soil and rubble from HWRC's).

At the other end of the spectrum, for those streams marked in red, the capture rate is less than 20%. Whilst some of these streams are, by definition, unlikely to be recyclable (e.g. "fines" are particles of waste which are too small to be identified), other streams show room for considerable improvement – e.g. food waste and textiles.

5.5.5 Other ways to measure environmental performance

It is important to note that, in developing this Strategy, a key task has been to reassess whether the former National Indicators represent the best way to measure the performance of the LWP. This review will be included in the Action Plan to accompany this Strategy document, and reflects the need to measure our success in meeting the objectives chosen by the Partnership.

5.6 Current waste management costs

In addition to measuring environmental performance, it is essential to measure how well we are meeting the challenges of diminishing budgets.

To enable comparison with historical costs, the costs of waste management in 2017/18 outlined in Table 5-21 are the totals of those formerly reported by each LWP authority as part of the Best Value Performance Indicator regime – BV86 for WCAs and BV87 for WDAs. The table also shows the equivalent 2006/07 cost per household which was included in the 2008 Strategy.

Table 5-21 Costs of waste collection and disposal for 2017/18

	Collection Costs (Total across all LWP WCA's)			Disposal Costs		
	Number of Households	Overall cost of collection	£/ HH	Municipal Waste (Tonnes)	Overall cost of disposal	£/ tonne
2006/07	308,931	£15,718,152	£50.88	365,537	£17,270,000	£47.25
2017/18	338,690	£14,879,176	£43.93	360,155	£18,774,000	£52.13

Despite increases in costs due to inflation and other factors, such as fuel tax, we have managed to achieve sufficient efficiency savings to reduce the overall cost of waste collection.

Disposal costs have risen a little overall, but considerable savings have been achieved compared to where we might have been, particularly had we continued to send large quantities of waste to landfill, for which Landfill Tax has increased significantly from £21 per tonne in 2006/07 to over £86 in 2017/18.

6 What are we aiming for?

The Partnership has made significant strides forwards during the lifetime of the previous Strategy, particularly in the development of an energy from waste facility to divert non-recycled waste away from landfill. This chapter identifies the challenges faced by the Partnership, currently and over the next few years, and the proposed approach to meeting these challenges.

6.1 Strategic objectives

In preparing this JMWMS, the LWP held two workshops to identify their overarching vision and objectives. Details of the process are included in Appendix A.

As a result, and as identified at the beginning of this document, the Partnership has the vision:

“To seek the best environmental option to provide innovative, customer-friendly waste management solutions that give value for money to Lincolnshire.”

89% of responses to the public consultation either agreed or strongly agreed with this vision, and a number of comments were received in support of the combined focus on value for money, care for the environment and customer-friendly services.

Opinion was divided as to whether the first priority should be money or the environment. In view of that, the LWP have clarified that they will be seeking **the best environmental option which can be afforded**.

In order to work towards this vision, the Partnership have developed and agreed a set of high-level objectives, which are key drivers for the delivery of this strategy. In line with the vision, each of these objectives is to be considered in the light of the Partnership’s shared values that:

All Objectives should ensure that services provided under the JMWMS represent the best possible environmental option which gives value for money for Lincolnshire residents.

The ten objectives, generated at the July 2017 workshops and, where stated, refined through the consultation feedback, are as follows:

Objective 1.	To improve the quality and therefore commercial value of our recycling stream.
This ties in with the EU and UK government commitments to move away from a "make, use, dispose" model towards a more circular economy.	
Objective 2.	To move towards a common set of recycling materials.
The UK government have expressed the view that the large number of different systems cause public confusion, and thus hamper people's ability to put the right things into recycling collections. Consultation: <i>This received considerable support and, in the light of feedback received, it has been strengthened by the removal of the word "consider".</i>	

Objective 3.	To consider the introduction of separate food waste collections where technically, environmentally and economically practicable.
<p>The EU and UK government support food waste collections. Consultation: Responses were divided as to whether this was a good idea. Supporters pointed out the environmental benefits, whilst others raised practical issues. The addition of "where practicable" allows for these concerns to be addressed, including through the undertaking of trial collections.</p>	
Objective 4.	To explore new opportunities of promoting waste minimisation and of using all waste as a resource in accordance with the waste hierarchy.
<p>The waste hierarchy remains a key driver. This "promoting" will include both communicating with the public and lobbying of government and manufacturers for changes to the wider picture. Consultation: In line with responses, specific reference is now made to waste minimisation.</p>	
Objective 5.	To contribute to the UK recycling targets of 50% by 2020 and 55% by 2025.
<p>Whilst it could be argued that recycling rate is not a true reflection of environmental performance, it remains the headline measure both at UK and at EU level. Update: The EU Circular Economy Package has introduced longer-term targets and we will need to respond to how these are featured in Defra's new Resources and Waste Strategy.</p>	
Objective 6.	To find the most appropriate ways to measure our environmental performance, and set appropriate targets.
<p>This will allow us to set targets which address progress towards our objectives rather than just chasing targets for their own sake.</p>	
Objective 7.	To seek to reduce our carbon footprint.
<p>This is a key way to measure the overall environmental impact of the services which we provide. Consultation: This was strongly supported, particularly if it allows us to measure the impact of transportation.</p>	
Objective 8.	To make an objective assessment of what further waste processing/disposal capacity is required and, as necessary, secure appropriate capacity.
<p>Forecasts are that we will continue to see considerable waste growth, and we need to ensure we have sufficient capacity to handle it in the best way possible. Consultation: In line with feedback, this has been expanded to include all waste streams rather than just residual (i.e. non-recycled) waste.</p>	
Objective 9.	To regularly review the LWP governance model in order to provide the best opportunity to bring closer integration and the implementation of the objectives set by the strategy.
<p>Whilst the LWP consists of a number of separate authorities, it is essential that we seek ways to work together to achieve the best outcomes for the people of Lincolnshire as a whole.</p>	
Objective 10.	To consider appropriate innovative solutions in the delivery of our waste management services.
<p>It is important not to be held back by sticking with existing practices where something new could improve things.</p>	

6.2 The challenges we face

Whilst the move from landfill to energy from waste as the main route for disposal of non-recycled waste has largely overcome the largest challenge identified in our previous Strategy, a number of key issues remain.

The landscape is uncertain as it is unclear what direction the Government's Waste and Resources Strategy, and resulting policy, will take as the UK leaves the European Union, but it seems clear that we will need to address falling recycling rates and increasing waste arisings.

6.2.1 Falling recycling rates in Lincolnshire

As indicated in Chapter 5, the Lincolnshire County Council recycling rate (which covers the LWP as a whole) has fallen in recent years from a peak of 52.9% in 2010/11 to 43.7% in 2017/18.

Whilst the overall tonnage collected from kerbside recycling bins has remained relatively stable, we have seen a rise in the percentage of that material which is **not** recyclable. In 2017/18 over a quarter couldn't be recycled, and this continues to rise still further. This includes some recyclables which had been damaged by those non-recyclable wastes – e.g. Paper made wet and dirty by food waste – a situation made worse by more stringent MRF regulation and an increasing emphasis on material quality worldwide.

6.2.2 The national and international picture

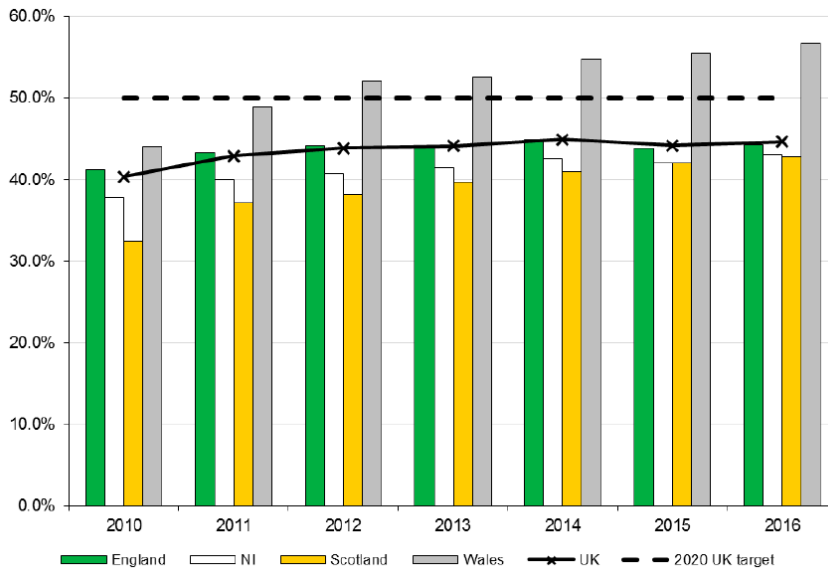
Defra statistics¹² show that the rate of recycling of waste from UK households has stalled. A small rise in 2016 followed a fall in 2015, meaning that the 2016 rate of 45.2% was very similar to that of 44.9% in 2014.

As shown in Figure 6-1, this stalling follows a number of years of growth. It is also interesting to note that the recycling rate for Wales is considerably higher than that in England, and that in Wales things operate very differently, including:

- There is a different method of financing waste management;
- All councils offer separate food waste collections; and
- Some authorities operate three or even four weekly residual waste collections.

¹² <https://www.gov.uk/government/statistics/uk-waste-data>

Figure 6-1 Defra chart showing data on recycling from UK households



This issue is made more complex by uncertainty over what recycling rate we should be seeking to achieve. Our current national target is the EU target of 50% recycling of waste from households by 2020. Beyond that, the EU Circular Economy Package sets targets rising to 65% in 2035. The interim targets are set out in section 3.1.2 of this Strategy.

Following the UK decision to exit the EU, the UK Government seem inclined to retain existing EU-related legislation, but it is unclear whether the 2035 target will apply to the UK. Furthermore, a UK-wide target is not currently binding on individual local authorities.

A further complication is that, as described in section 5.5, the UK's national performance is measured (and reported to the EU) on a different basis to the official recycling rate attributed to individual UK councils and thus to the LWP. Although the LWP has joined in lobbying for this to be rectified, there is no indication that a change is imminent.

6.2.3 Growth in waste arisings

As described in Chapter 5, each year usually sees growth in the tonnage of waste for which the LWP is responsible. There are two reasons for this increase:

- Population growth – Lincolnshire’s population grew by more than 5% between 2011 and 2017. See section 5.1 for further details.
- Weight of waste per person – Whilst this stabilised somewhat during the economic downturn, there is concern that this will now resume its historical upwards trend.

This is a particular concern given that our Energy from Waste facility is already operating at close to full capacity and, without a new processing route, any additional residual waste would have to be sent to landfill.

7 How will we get there? – Our "Forward Plan"

In order to deliver the aims and objectives to which the Partnership aspires (see earlier chapters), it is essential that work undertaken by each partner organisation is focussed on actions which will further the objectives as set out in this Strategy.

This work is summarised in an Action Plan, the initial version of which has been developed alongside the preparation of this main Strategy document and is included herewith as Appendix D. Once adopted, the Action Plan will be reviewed on a regular basis (see Chapter 8) to ensure that it remains up to date for the lifetime of the Strategy, with additional actions added as work programmes are developed.

This chapter summarises the key themes which will shape our work together over the next few years, and these will guide the ongoing development of our Action Plan. In order to ensure that the LWP's efforts are focussed in the right direction, this chapter includes a table showing the links identified between each theme and each of our strategic objectives.

Also included here is information regarding the key workstreams identified for the initial Action Plan.

7.1 Seeing the wider picture

It is crucial that each LWP partner authority is proactive in seeking to consider their actions in as broad a context as possible. This will feature a number of diverse elements including those shown below.

7.1.1 Developing links with other local authorities

Any local authority is stronger when it learns from and, where appropriate, seeks to work with other councils. We will do this by:

- Strengthening relationships within the LWP
- Working with and learning from authorities outside the LWP

7.1.2 Engaging with the commercial sector

Particularly in a time of reducing council budgets, it is important that we engage with businesses working in the waste sector in order to:

- Seek new opportunities to improve our services or save money
- Seek ways in which we could benefit by being more commercially-minded
- Be more aware of the potential value of the waste which we collect
- Help to fill any processing capacity gaps

7.1.3 Addressing any waste processing capacity gaps

We have already identified some waste streams where there may be insufficient capacity at local facilities. The largest and most pressing of these is that forecasts indicate that our growing

population are likely by 2037 to produce 54,000 tonnes per annum of residual waste above and beyond the capacity of our existing EfW facility.

In order to mitigate against this, particularly in the light of expected growth in Lincolnshire's population, we need to ensure that we:

- Make good forecasts of how much of each waste type we are likely to have
- Promote the development of infrastructure for new and existing waste streams

7.2 Balancing economic and environmental benefits

It is essential that every attempt is made to provide services which give value for money to the people of Lincolnshire, particularly due to the need for prudence with the public purse and ongoing annual reductions to Council budgets. However, it is also important where possible to maximise the positive environmental impacts of how we handle our waste.

The importance of both of these aspects is reflected in their inclusion in the Vision which the Partnership has agreed for this Strategy:

“To seek the best environmental option to provide innovative, customer-friendly waste management solutions that give value for money to Lincolnshire.”

7.2.1 Ensuring value for money

Providing the best overall value for money for the council-taxpayers of Lincolnshire may mean finding innovative ways to fairly distribute costs and savings incurred by different authorities as part of any service change.

7.2.2 Caring for the environment

This will be undertaken in a number of ways, including:

- Following the Waste Hierarchy – This is enshrined in law
- Improving the environmental impact of existing services – e.g. use of heat from the Energy from Waste facility
- Reducing our carbon footprint
- Adopting and promoting “circular economy” thinking
- Considering the use of new and innovative technology

7.2.3 Finding the balance in practice

In the light of consultation responses received, including those from partner authorities, the LWP have agreed to assess the benefits of different options by seeking "the best environmental option which can be afforded".

7.3 Reviewing what we collect and how

A key element of the implementation of this Strategy is our response to the WRAP-sponsored work to assess the various options for how each of the LWP's Waste Collection Authorities operate their collection services. The decision-making process will need to feature a variety of elements such as:

- Evaluating the business case – Do the finances stack up?
- Focusing on streams with the most economic and/or environmental value
- Identifying barriers and how to overcome them – e.g. startup costs of service changes
- Considering the introduction of new collections – e.g. food waste
- The impact on collection rounds and collection vehicles
- The disposal both of the new collections and of other streams affected by the removal of some material

7.4 Getting our messages across

It is essential that we communicate well so that we, as Councils, are not acting in isolation. This means developing plans for how to deliver key messages:

- To the users of our waste services – e.g. What to put in which bin
- To the national Government – Influencing national strategy and policy to tie in with our own
- To other stakeholders – Parish Councils, Environment Agency, etc
- To the commercial sector – To waste producers and waste businesses

Communicating with the public is particularly important, particularly in the event of any changes to services. Indeed, this ties in directly with our strategic vision by making our services more customer-friendly, and by making it as easy as possible for people to help us to protect the environment and to provide value for money.

In communicating these messages it is important that, as well as explaining what we would like the public to do, we also explain why – i.e. how it will help to achieve our strategic objectives.

Table 7-1 Linking themes with strategic objectives

Theme/Project	Obj.1	Obj.2	Obj.3	Obj.4	Obj.5	Obj.6	Obj.7	Obj.8	Obj.9	Obj.10
Seeing the wider picture										
Developing links with other local authorities – Strengthening relationships within the LWP		Y							Y	
Developing links with other local authorities – Working with and learning from authorities outside the LWP						Y		Y	Y	Y
Engaging with the commercial sector – Seek ways in which we could benefit by being more commercially-minded	Y			Y						Y
Engaging with the commercial sector – Be more aware of the potential value of the waste which we collect	Y	Y		Y						
Engaging with the commercial sector – Help to fill any processing capacity gaps			Y	Y				Y		
Addressing any waste processing capacity gaps – Make good forecasts of how much of each waste type we are likely to have	Y		Y					Y		
Addressing any waste processing capacity gaps – Promote the development of infrastructure for new waste streams	Y		Y	Y			Y	Y		
Balancing economic and environmental benefits										
Ensuring value for money	Y		Y	Y						Y
Caring for the environment – Following the Waste Hierarchy				Y			Y			
Caring for the environment – Improving the environmental impact of existing services	Y			Y	Y	Y	Y			
Caring for the environment – Reducing our carbon footprint							Y			
Caring for the environment – Adopting and promoting “circular economy” thinking	Y			Y						Y
Reviewing what we collect and how										
Evaluating the business case			Y	Y						
Focusing on streams with the most economic and/or environmental value	Y	Y		Y						
Identifying barriers and how to overcome them	Y	Y	Y		Y					Y
Considering the introduction of new collections				Y	Y		Y			
Getting our messages across										
To the Lincolnshire public					Y					
To the national government					Y	Y				
To other stakeholders – Parish Councils, Environment Agency, etc			Y		Y	Y				
To the commercial sector – To waste producers as well as waste businesses	Y	Y	Y	Y	Y			Y		Y

7.5 Key workstreams for initial Action Plan

The initial Action Plan has been developed on behalf of the LWP by an Officer Working Group including representatives from each partner council.

Six separate streams of work have been identified to enable us to begin to work towards the objectives identified in this Strategy. In the initial Action Plan, attached as Appendix D, each workstream is listed with one or more specific actions which relate to it.

Further details of each workstream, and how it relates to our objectives, are listed below.

7.5.1 Strategic Review of Kerbside Mixed Dry Recycling Collection and Disposal	
Scope:	To investigate the feasibility of ‘harmonising’ the countywide kerbside MDR mix to find the most effective balance between reducing residual waste, increasing recycling rates, reducing contamination and maximising the value of our recycle, taking into account household/population growth forecasts. In line with Consultation feedback, this workstream will also include: <ul style="list-style-type: none"> • A communications campaign to ensure that the public are well-informed about the service, and the part they can play in its success; and • A review of Household Waste Recycling Centres and how they tie in with kerbside services.
Supports:	Objectives 1,2,4,5,7,8 and 10

7.5.2 Food Waste Trial	
Scope:	A wide range of operational waste issues are being considered as part of the development of the Joint Municipal Waste Management Strategy. To assist in increasing the capacity at the Energy from Waste facility, one of these proposals is the potential for a countywide food waste collection and recycling service. It has therefore been decided to undertake a food waste trial in selective locations within South Kesteven District Council (SKDC), to cover urban, rural and semi-rural areas, totalling some 4733 properties.
Supports:	Objectives 1,2,3,4,5,7,8 and 10

7.5.3 Strategic Review of Options for Continuous Improvement for Waste Collection and Disposal Arrangements in Lincolnshire	
Scope:	To identify the most efficient and effective collection and disposal methods for managing the County’s municipal waste. This will be a “theoretical” exercise ensuring existing arrangements are NOT taken into account. All collection and disposal methods will be considered.
Supports:	Objectives 7,8,9 and 10

7.5.4 Location of additional processing/disposal sites	
Scope:	To identify high users of energy within Lincolnshire, both current and anticipated through Local Plans and other plans, so consideration can be given to investigate the opportunities for appropriate waste infrastructure and deliver a co-ordinated effective and efficient waste collection/disposal service, including for future growth.

	This will also assist in the consideration of the financial aspects through the local energy produced and ensuring that the infrastructure is environmentally friendly by reducing carbon mileage.
Supports:	Objectives 7,8 and 10

7.5.5 Choosing performance indicators appropriate to measure environmental performance	
Scope:	To identify a suite of performance indicators which give a clear way of measuring our environmental performance, including our carbon footprint. This will allow us to measure our progress towards our strategic objectives.
Supports:	Objectives 6 and 7

8 The next steps: Monitoring, implementing and reviewing the strategy

To help identify the best option for managing our waste in the future, we have begun to:

- Assess options for our waste collections; and
- Consider the disposal implications of those collection options.

However there are further considerations required to ensure the strategy can be implemented successfully to meet our shared strategic objectives.

8.1 Monitoring the strategy

In order to know how well we are meeting our strategic objectives, it is important to establish and report on appropriate measures.

The key measures which are currently reported to the Partnership include:

- Percentage of household waste sent for reuse, recycling or composting (formerly a National Indicator, NI 192) – This is particularly important as it reflects our contribution to the national recycling target.
- Total tonnage of residual (non-recycled) waste – This is important as it reflects how well we are doing in implementing the waste hierarchy, both by recycling and through waste minimisation.

As a result of our new strategic objectives, and in line with Objective 6, new measures will need to be considered in order to monitor key issues such as our combined carbon footprint. The development of a new suite of measures is included in the Action Plan to accompany this Strategy, and will help us to pursue our Vision “to seek the best environmental option to provide innovative, customer-friendly waste management solutions that give value for money to Lincolnshire.”.

In developing new measures, such as carbon emissions, it is important not to lose sight of the big picture, such as:

- Advances we have made over the last few years – e.g. Compare performance not just with current services but also with where we would be if we landfilled everything.
- Side benefits of our services – e.g. Use of the energy generated at the EfW facility.

Once a suite of performance indicators has been agreed, these will be regularly reported to the LWP, with statistical data accompanied by sufficient commentary that informed decisions can be made on any necessary changes to service provision or to future versions of the Action Plan.

8.2 Implementing the strategy

8.2.1 Funding and support

Due to council budgets reducing, and the need to adopt more sustainable waste management practices, further pressure will be placed on service budgets. While the Partnership has begun to identify ways in which our combined services might be improved, these will need to be considered pragmatically in the light of the available budget. The Partnership will also need to actively seek any funding opportunities, whether from Government or otherwise, which can help us to afford to undertake work in support of the Objectives identified in this Strategy.

8.2.2 Partnership working

To ensure the Partnership continue to improve services and develop efficiencies it is essential to work together to deliver the strategy. Working together enables the collection and disposal requirements to be coordinated to ensure that future collection service provision is provided with adequate treatment and disposal infrastructure.

In accordance with Objective 9, we are committed:

To regularly review the LWP governance model in order to provide the best opportunity to bring closer integration and the implementation of the objectives set by the strategy.

8.2.3 Implementing the strategy

The Partnership has made a commitment to implement this strategy and has recognised that significant changes are required over the next 10 years. To deliver these changes an action plan has been prepared by the Partnership which clarifies the actions and tasks required to meet the objectives as set out in the Strategy.

The delivery of tasks within the action plan will need to be monitored and reviewed annually to ensure the Partnership will deliver the targets it sets itself through this Strategy. Where significant changes occur, the action plan will be updated accordingly.

The action plan establishes how the Strategy will be delivered, considering what will be required by the Partnership in terms of:

- Action required to deliver waste minimisation and further increase recycling and composting;
- Future changes or improvements to collection services (residual waste, dry recycling, garden waste and potential food waste); and
- Investments required to deliver future residual waste treatment facilities and additional recycling infrastructure.

8.3 Reviewing the strategy

This Strategy will need to be regularly reviewed in order to ensure that our shared objectives remain appropriate, and to change them if necessary. This will, in line with government guidance, happen at least every five years, meaning that the LWP will undertake an initial review by 2023 at the latest.

This will be particularly important in the light of any changes to the operational and legislative landscape, including:

- The UK's departure from the European Union, and any changes in UK waste legislation and policy which arise from that; and
- The level of funding provided to each Authority by the UK Government.

As previously stated, the accompanying Action Plan will also be regularly reviewed to enable us to continue to meet our objectives.

Appendix A – Development of Vision & Objectives

As a joint Strategy, shared by all LWP partner authorities, an important part of the strategy development process was to ensure early involvement from all.

Two workshops were held in July 2017 at which partners had a series of discussions through which a shared Vision and Objectives were agreed. Full details of these workshops, and the output from them, are shown in the attached report.

With the addition of a 10th Objective to reflect the LWP's desire to seek innovative solutions, this Vision and Objectives were presented in the Consultation Draft of the JMWMS, and were generally well received. In response to feedback received, the agreed Objectives have been updated, although each one still retains the theme which was set out at the original workshops.



Ricardo
Energy & Environment

Lincolnshire Waste Partnership Joint Municipal Waste Management Strategy Workshops

Report for Lincolnshire Waste Partnership
Lincolnshire Waste Partnership JMWMS

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The Lincolnshire Waste Partnership – Joint Municipal Waste Management Strategy Workshops

Introduction

As the Lincolnshire Waste Partnership's (LWP)'s only Waste Disposal Authority (WDA), Lincolnshire County Council (LCC) has taken responsibility for the project management of the review of its current Joint Municipal Waste Management Strategy (JMWMS).

In order to ensure that the JMWMS is jointly owned by all the authorities in the LWP, the WDA arranged two workshop sessions, to which each LWP member authority was invited. These were designed to encourage input from across the LWP in formulating the Visions and Objectives of the Strategy through the capture of a balance of views from across the LWP member authorities.

The Workshops were held at the Hykeham Energy from Waste Visitor Centre.

The first Workshop, on 6th July 2017, was titled "What do we want to achieve?" and aimed to reach agreement on the Vision and broad brush Objectives for the JMWMS.

The second Workshop, on 20th July 2017, was titled "How do we achieve it?" and aimed to develop a framework for the action plan.

The Workshops were Chaired and facilitated by Ricardo Energy & Environment, to provide an independent voice, with the aim of ensuring all attendees were able to voice their opinions, concerns, experience and ambitions. A key aim of the workshops was to ensure that the JMWMS is equally informed by input from all eight LWP authorities.

Over twenty delegates from the eight authorities (Boston Borough Council, City of Lincoln Council, East Lindsey District Council, North Kesteven District Council, South Holland District Council, South Kesteven District Council, West Lindsey District Council, and Lincolnshire County Council) attended each workshop to contribute to the discussion and put forward their views. A list of the attendees at each workshop can be found at Appendix 1.

Workshop Methodology

Each workshop commenced with a briefing from the Chair outlining the overarching process of developing the Strategy, and consideration of legislative and political constraints, opportunities and other influencing factors impacting on the Strategy. Attendees were then invited to contribute to discussions regarding challenges and opportunities and their priorities for the Partnership.

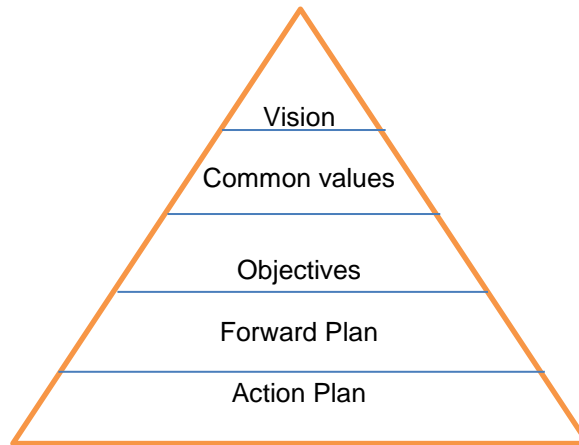
To facilitate discussion, a Scoping Paper had been prepared, setting out the broad Objectives as identified by the County Council. Additionally, information had been compiled to summarise the aims of the current (2008) Strategy, and performance indicators demonstrating performance across the original ambitions.

The Agenda for each Workshop was designed to provide enough time for a thorough analysis of the Scoping Paper, with the option of changing, adding, revising, removing or redesigning each of these elements.

The workshops utilised a combination of group discussions, break-out sessions and summary deliberations to scope the issues, challenges and opportunities, whilst identifying the key priorities for the LWP.

Summary of Outcomes

During the discussions, a general structure of elements of the Strategy began to form: this is illustrated below:



Discussions regarding each of these elements are set out in the following sections.

1. Vision

At the second workshop, the Vision for the Strategy agreed in Workshop 1 was re-presented to the group and agreed:

Vision for the Lincolnshire Joint Municipal Waste Management strategy

“To seek the best environmental option to provide innovative, customer-friendly waste management solutions that give value for money to Lincolnshire.”

2. Objectives

At the second workshop, attendees considered the revised Strategic Objectives. All comments, considerations, concerns and criticisms from Workshop 1 had been recorded, and these were used to thoroughly revise the Objectives in line with the Workshop’s overall feedback and input. Subsequently, these revised Objectives had been circulated by e-mail for further feedback. Comments were generally positive, but further comments were received, and these had been incorporated into a third iteration of each Objective where necessary. Some Objectives had been combined or removed, as they were considered actions.

Attendees at the second workshop analysed, considered and amended each Objective, until agreement was reached on the final iteration of each one. A summary of the evolution of the Objectives, from Scoping Paper to final iteration, can be found at Appendix 2.

Throughout the review of the list of Objectives, it became clear that two over-riding elements were being repeated, and were in danger of making the Objectives unnecessarily wordy and repetitive. It was thus agreed that these two over-riding values should be applied when considering any of the other Objectives.

A hierarchy was thus agreed whereby the LWP will have its vision, underneath which are the elements which describe the values which inform each of the Objectives.

All Objectives should ensure that services provided under the JMWMS represent the best possible environmental option which gives value for money for Lincolnshire residents.

The agreed Objectives will thus all be subject to these overarching approaches, which clearly tie in with the "value for money" and "environmental" aspects of the Vision.

The discussions around the common values developed a preference for ordering the Objectives to reflect the priority order of: value for money; environmental outcomes; and other Objectives.

In the light of the comments from attendees, to reflect this approach, the financial Objectives move to the top of the list, whilst the environmental Objectives follow, ordered by their position in the Waste Hierarchy. This leaves the LWP governance review as the final Objective, recognising that it is currently less of a priority as a review was done in 2016.

The revised list of Objectives in the Summary reflects the revised ordering agreed.

The draft agreed Objectives:

- 1. To improve the quality and therefore commercial value of our recycling stream**
- 2. To consider moving towards a common set of recycling materials.**
- 3. To consider the introduction of separate food waste collections**
- 4. To explore new opportunities of using all waste as a resource in accordance with the waste hierarchy.**
- 5. To contribute to the UK recycling target of 50% by 2020.**
- 6. To find the most appropriate ways to measure our environmental performance, and set appropriate targets.**
- 7. To seek to reduce our carbon footprint.**
- 8. To make an objective assessment of whether further residual waste recovery/disposal capacity is required and, if necessary, seek to secure appropriate capacity.**
- 9. To regularly review the LWP governance model in order to provide the best opportunity to bring closer integration and the implementation of the Objectives set by the Strategy.**

It was noted that further editing of the Objectives may be necessary as a result of the Strategic Environmental Assessment (SEA) and Public Consultation processes, as well as any changes in external factors between now and the adoption of the Strategy.

3. Forward Plan

Attendees at the 2nd workshop were briefed on the need to develop a Forward Plan as part of the main JMWMS document. This Plan will summarise the types of strategic action required to fulfil the agreed objectives.

Whilst discussions at both workshops largely only focussed as far down as the objectives, those discussions did identify a number of types of action required to achieve the agreed Objectives.

The list attached as Appendix 3, prepared by the County Council, was intended to be shared at the 2nd workshop, but the planned session to discuss and revise it was superseded by the need to talk about specific and urgent actions regarding one of the objectives – the introduction of food waste collections.

This list will be circulated in a format which allows for further comment and for the addition of other proposed action types for the Forward Plan.

4. Strategic Action Plan

The initial Action Plan will be a separate document developed from the JMWMS Forward Plan. This will differ from the Forward Plan in that it will:

- 1) Be more detailed – i.e. who will do what and by when.
- 2) Contain targets and activities which are "SMART" – i.e. Specific, Measurable, Achievable, Relevant and Time-based.
- 3) Cover only the first year of the Strategy's lifetime – It will be reviewed annually thereafter.

Work on the Action Plan will begin once the Forward Plan has captured the types of action which are required to meet the agreed strategic objectives.

Food Waste Collections

Having said that work on the Action Plan is to begin later, discussions planned to happen at Workshop 2 regarding actions to go into the Forward Plan were postponed in light of the urgent requirement for movement on the assessment of food waste collections, as identified by elected Members meeting together prior to Workshop 2.

Work is underway, including as part of the WRAP-sponsored assessment of collections consistency, to identify and allocate the necessary actions, including:

- Assessment of the costs to introduce collections.
- Assessment of the possible disposal savings.
- Consideration of a pilot project to begin as soon as possible.
- Information-gathering from other authorities who have introduced such collections.
- Visits to see possible vehicles for doing the collections.

This work will need to be monitored, recorded, and included in the JMWMS documentation.



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Appendix B – Consultation Feedback

A formal consultation process was undertaken from 4th April to 2nd July 2018. This appendix summarises the results of that consultation and its influence on the final version of the JMWMS.

Summary

The draft strategy was generally well received, and responses to the consultation indicated a high level of support for the overall direction of the JMWMS. Specifically, of the 147 responses to the survey:

- 89% agreed or strongly agreed with the vision we have set out
- 75% agreed or strongly agreed that the proposed objectives can achieve that vision

Many of the comments received tied in with the vision which we have set out, agreeing that the LWP should:

- Ensure value for money;
- Care for the environment; and
- Provide customer-friendly services.

Other comments suggested areas in which the JMWMS could be strengthened or revised. Examples of how these are reflected in the revised version of the JMWMS are shown below.

Feedback received	How revised JMWMS reflects this
Specific actions need to be identified to show how the LWP will work to achieve their objectives.	An initial Action Plan has been produced and is attached as Appendix D. This Action Plan will be reviewed on an annual basis to ensure it remains up to date and effective.
Better publicity is needed to ensure that people know what to put into which collections.	The Action Plan includes: <ul style="list-style-type: none">• A review to try to simplify our collection schemes; and• A communications campaign.
Opinion was divided over whether food waste collections were a good idea.	The Action Plan includes undertaking a trial to assess the effectiveness of food waste collections. This trial, which actually began in June 2018, will enable decisions on possible wider collections to be based on real data.

Consultation process

As part of the waste strategy and SEA process there is a statutory requirement to undertake consultation. Furthermore, consultation enables the LWP to take into account the views of the public and other stakeholders in the final JMWMS.

It is recommended that the consultation period lasts for 90 days, but this is not statutory. The public were consulted on the proposed draft strategy and the draft environmental report, which presents the outcomes of the Strategic Environmental Assessment (SEA).

There are numerous consultation methods available and each authority is free to choose how their consultation is undertaken.

Consultation methods selected

The LWP chose to carry out a formal consultation between 4th April and 2nd July 2018 (90 days). The documents made available during the consultation period were:

- The full draft strategy and appendices
- Summary of the strategy
- Draft environmental report and its appendices

The consultation took the following forms:

- Publicising the consultation
- Web-based consultation documents and questionnaire
- Paper documents and questionnaire (available on request)
- Libraries and LWP council offices
- Face to face briefings for Elected Members at LWP councils

Publicising the consultation

In order to reach as wide an audience as possible, a variety of means were used to publicise the consultation, including:

- Press releases – These were taken up and published by a number of media outlets
- Social media advertisements – Facebook and Twitter
- Direct emails to key groups
 - Statutory SEA consultees (Environment Agency, Natural England & Historic England);
 - Parish Councils in Lincolnshire;
 - A variety of waste-related businesses in Lincolnshire; and
 - Neighbouring councils.

Questionnaire – Web-based approach

In the light of the aims set out in the vision – to protect the environment and provide value for money – it was decided that the focus of the consultation should be online rather than producing large numbers of paper copies.

Local residents and any other interested parties could access all consultation documents through the Recycle for Lincolnshire area of the Lincolnshire County Council website. A web-based questionnaire was provided to invite views on key topics, the benefit being that, as well as receiving comments, it provided statistics giving an indication of overall opinion. Also, a dedicated email account (wastestrategy@lincolnshire.gov.uk) was provided for other feedback and queries.

In total 147 completed questionnaires were completed, including five which were received in paper form and typed in by council staff. The results are summarised later in this appendix.

Questionnaire – Paper copies

Whilst our preferred engagement method was online, the website made it clear that we were happy to send out on request paper copies of any or all of the documents. A number of items were sent out in the post but, unfortunately, only five paper questionnaires were returned.

Questionnaire – Libraries and LWP council offices

Aware that not everyone has access to the internet, and in order to reach as wide an audience as possible, paper copies of key documents were sent out for display in public locations around the county:

- The main office of each of the eight LWP partner councils; and
- All 15 of the County Council's core public libraries.

In addition to a single reference copy of the full JMWMS and a poster advertising the consultation, each location received several copies of the following which could be taken away:

- A brief summary version of the JMWMS document – Essentially Chapter 1, including how to access the full documents and how to respond;
- The consultation response form; and
- A Freepost return envelope.

Face to face briefings for Elected Members at LWP councils

Between them, Councillors are the elected representatives of every member of the public in Lincolnshire. In order to ensure the JMWMS captures the views of the wider Membership of each Council, representatives of the LWP visited each of the eight LWP councils to give a face to face briefing, and to invite them to submit a formal consultation response. These responses are summarised later in this appendix.

Questionnaire results

The questionnaire consisted of 10 questions which, for clarity, are divided below into four sections. Several questions came as a pair with a selection list for the first part (to allow for statistical analysis) and a follow-up question asking for further information.

It was decided not to ask for any personal details so that answers could remain truly anonymous. This also avoids possible issues under Data Protection legislation as it would be difficult to justify that such information was necessary.

The following responses almost all were submitted online. The five paper copies received was typed into the online form by a member of council staff to allow them to be included in the statistical reporting.

Responder details

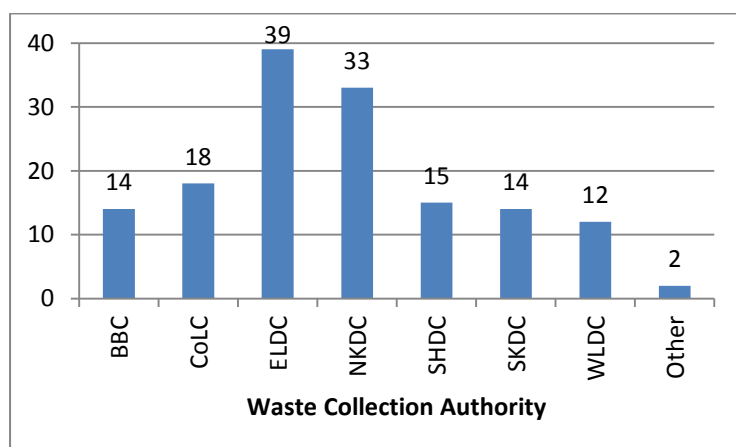
1. In what capacity are you responding to this survey?

We have managed to obtain the views of a significant number of Lincolnshire residents. Unfortunately we have not heard much from other groups.

	Responses	Notes
Lincolnshire Resident	126	Also received seven responses via email
County Councillor	2	The County Council also responded via formal Council submission – see later in this appendix
District Councillor	6	All seven District Councils also responded via formal Council submission – see later in this appendix
Parish/Town Councillor	5	Also received two Parish Council responses via email
Waste business employee/owner	4	Also received two responses via email
Neighbouring authority representative	0	Details sent to all neighbouring authorities. None used the survey, but two responded directly by email.
Other	4	All were formal responses from LWP partner authorities. Also received three "other" responses via email
TOTAL	147	

2. In which area do you live or are you/your organisation based?

Whilst some areas are better represented than others, we have managed to get multiple responses from every area within Lincolnshire. The two "other" responses were people who did not answer this question.

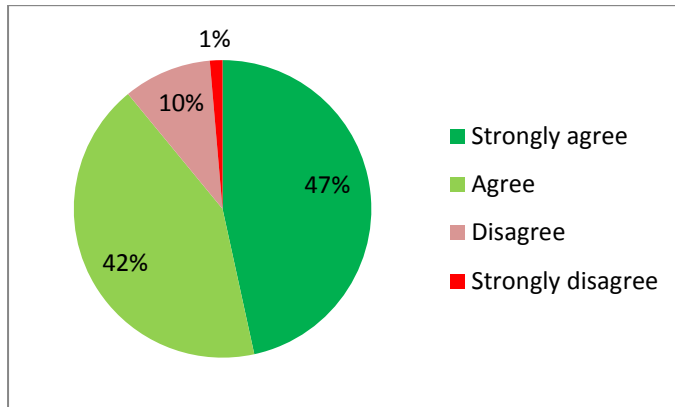


Contents of draft JMWMS

3. Do you agree or disagree with the Lincolnshire Waste Partnership's vision for this Strategy?

89% of responders agree or strongly agree with the vision as set out in the draft JMWMS:

"To seek the best environmental option to provide innovative, customer-friendly waste management solutions that give value for money to Lincolnshire".



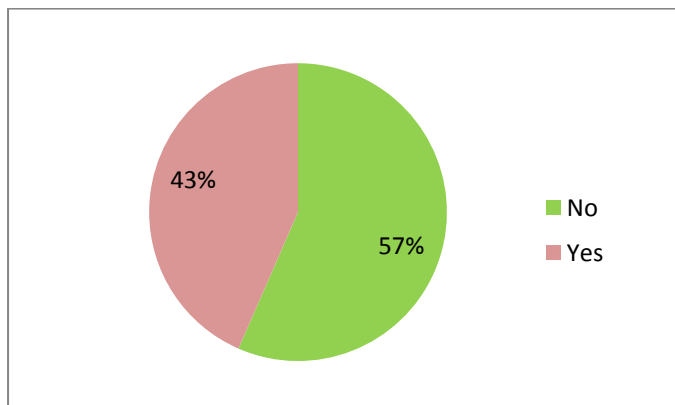
Why have you answered this way?

Concern was expressed that the vision was too long, and that balancing the contrasting elements could be used as an excuse for poor performance – e.g. 'it was innovative but too expensive' or 'it was effective but not customer friendly'. It was also suggested that the vision should mention waste minimisation.

As with other questions, comments not directly related to this question will be included in the list of "comments received" given later in this Appendix.

4. Are there any key issues, other than those we have identified, which should be driving our Waste Strategy?

43% of responders believed other issues should be considered.

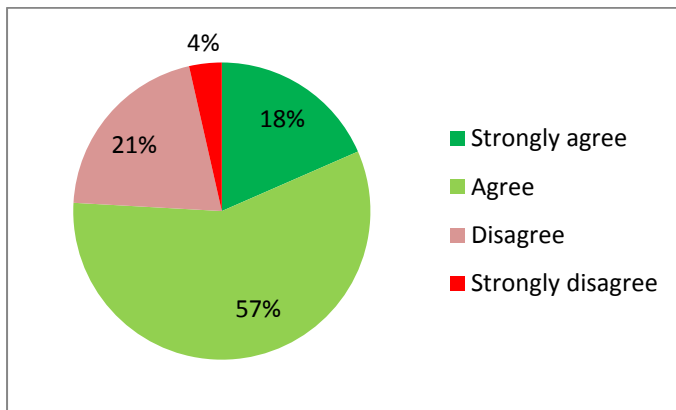


If you answered "no", then what else should we include?

Due to the wide range of suggestions, proposed additions are included in the list of "comments received" given later in this Appendix.

5. Do you agree or disagree that the objectives we have set out will enable us to meet the challenges we face and therefore achieve our vision?

75% of responders agree or strongly agree with this.



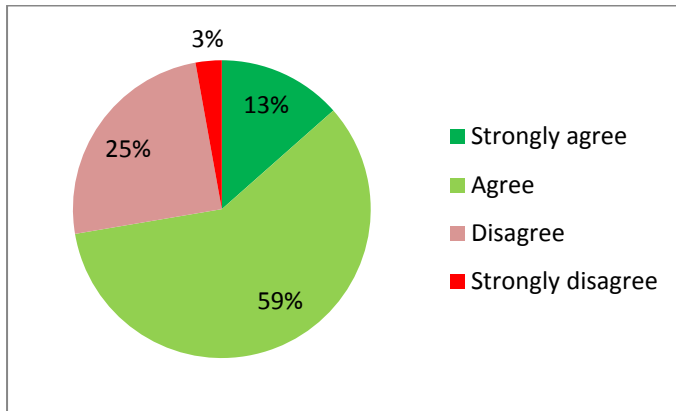
Why have you answered this way?

Those who disagreed expressed a variety of concerns and suggestions, including:

- Funding – Need to lobby central government for more funding
- Commit more – Should say what we'll do, not "consider" or "seek to"
- Food waste collections – Not convinced of the environmental or financial benefits
- Costs – Need to think long-term savings even if it means extra costs now
- Commercial waste – Need to consider this, not just household waste
- Education – Need better communications to educate the public

6. Do you agree or disagree that our Forward Plan, as described in Chapter 7, contains all the actions we need to achieve our objectives?

72% of responders agree or strongly agree with this.



Why have you answered this way?

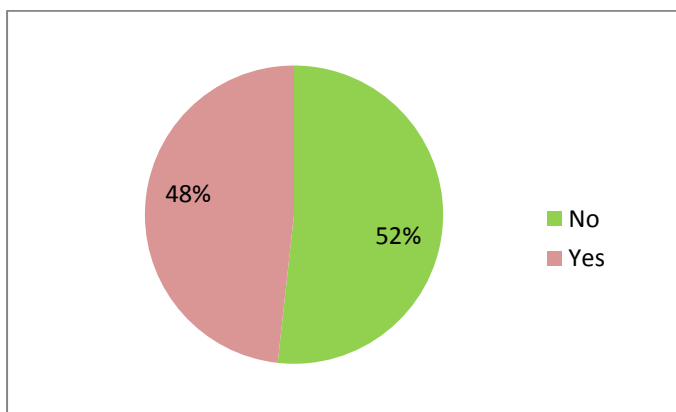
There were multiple responses along similar lines:

- We need to state a more specific list of actions
- We need to communicate better with the public

Other comments have been grouped together and included in the list of "comments received" given later in this Appendix.

7. Do you have any specific concerns about the strategy?

48% of responders have specific concerns.



If you answered "yes", please tell us what concerns you have.

Due to the wide range of concerns expressed, these are included in the list of "comments received" given later in this Appendix.

Equality issues

The Equality Act 2010 places organisations under a duty to ascertain how people with 'protected characteristics' are impacted by an organisation's activity, and how steps may be taken to mitigate or eliminate adverse impact(s).

8. Do you think the draft strategy could have a positive or negative impact on you (or someone you care for or support) due to any of the following?

	Positive Impact	No Impact	Negative Impact	Don't Know
Age	14%	47%	19%	20%
Sex (male/female)	9%	69%	6%	16%
Disability	9%	43%	21%	27%
Sexual orientation	6%	73%	2%	19%
Pregnancy and maternity	9%	55%	13%	22%
Marriage and civil partnership	8%	72%	2%	18%
Race (ethnicity)	5%	72%	4%	19%
Religion or belief	6%	73%	2%	18%
Gender reassignment	5%	73%	2%	20%

There was a general feeling that, for most people groups and particularly for future generations, the impact would be positive. However, there were three categories for which more people identified a negative impact than a positive one:

- Age
- Disability
- Pregnancy and maternity

The opportunity was given to identify other specific groups who could be impacted. The only other group suggested was residents of terraced properties, and the impact suggested has been included in the table below.

Also, some respondents expressed concern that, until the Action Plan identifies specific service changes, it is not possible to identify possible impacts.

If you have identified a potential impact, how would the proposed strategy impact you (or someone you care for or support) and how could any negative impacts be reduced?

The comments made in this section have been added to the Equality Impact Analysis which is being undertaken to accompany the JMWMS. The below summarises the responses received, including suggestion mitigation for negative impacts. These impacts, and appropriate mitigation, will be considered in putting the JMWMS into action.

NB – The impacts listed are those identified in consultation responses and, in some cases, it is not clear what the perceived impact actually is.

Negative Impact	Groups affected				Mitigation
	Age	Disability	Pregnancy and maternity	Other	
Confused by service changes	Y	Y	Y	Race (language)	Focused communications through a variety of methods
Difficulty moving heavy wheelie bins	Y	Y	Y	Sex (did not specify which)	Assisted collections
Repeated emptying of kitchen caddy	Y	Y	Y		Small kitchen caddy with liner
Possible infection from decaying food	Y	Y	Y		Lidded kitchen caddy; exterior bin; weekly collections
HWRC / bring bank access	Y	Y	Y	Sex ("parents with children and single parent families being more likely to be female")	Proactive assistance from site staff
Access to plastic recycling if kerbside service removed due to Deposit Return Scheme		Y			Consideration of alternative service if this happens
Nappies & formula milk produce extra waste			Y		Response suggested: "Promote breast-feeding and reusable nappies"
Lack of space for storing multiple bins				Residents of terraced properties	Consideration of alternative service

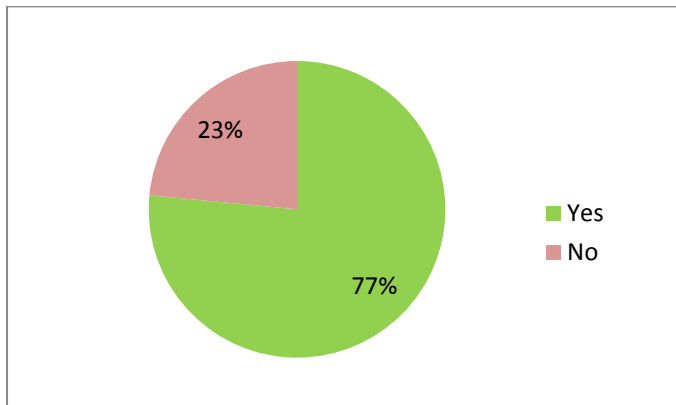
In addition to the specific negative impacts which were identified, it has also been noted that a number of other respondents also expressed, in the text of their answers to other questions, the view that age could be an issue, and that the LWP need to ensure that services are accessible to everyone.

Strategic Environmental Assessment

The remaining questions related to the Environmental Report which accompanies the JMWMS. This was prepared as part of the Strategic Environmental Assessment, a process which we are required to undertake alongside the development of the JMWMS itself.

9. Does the Environmental Report correctly identify the likely significant effects of the draft Joint Municipal Waste Management Strategy?

77% of responders said "yes".



If you answered "no", please tell us what else you think should be included.

Most of those who answered "no" said that the Environmental Report was too long and too complicated to read. Unfortunately the SEA process is prescribed by legislation, and the contents of the Environmental Report reflect that process. We have endeavoured to take the SEA results into account in writing the JMWMS.

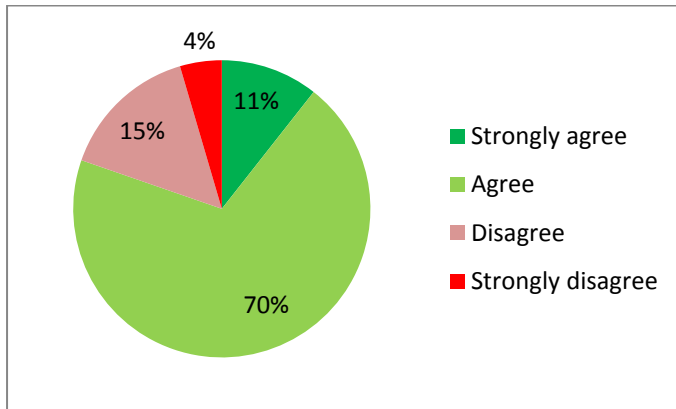
Others said that the SEA is difficult to assess without seeing the Action Plan which will accompany the JMWMS. Potential environmental impacts will indeed be considered in developing the initial and future Action Plans. This will include the location of potential new waste facilities, which was another topic raised.

One responder was concerned that there is not enough focus in the SEA on climate change and carbon emissions. This was raised in other responses with regard to the overall JMWMS, and is reflected in our objective "to seek to reduce our carbon footprint".

Other responses to this question raised concerns about the JMWMS in general, and these are included in the list of "comments received" given later in this Appendix.

10. Do you agree or disagree that the draft JMWMS has sufficiently taken account of the information provided in the Environmental Report?

81% of responders agree or strongly agree with this.



If you disagree, please tell us what else you think should be taken into account.

Those who "strongly disagree" all expressed concern over the length and complexity of the Environmental Report, as did several of those who "disagree". As already stated, this is necessary due to how the SEA process is prescribed by legislation.

Other responses to this question mirror concerns raised in response to earlier questions, and these are included in the list of "comments received" given later in this Appendix.

Comments received

Formal responses from LWP partners

As previously stated, in order to ensure the JMWMS captures the views of the wider Elected Membership of each Council, representatives of the LWP visited each of the eight LWP councils to give a face to face briefing. Each council was invited to submit a formal consultation response.

The following provides a summary of those responses.

Five responses were submitted in the form of the same questionnaire as used by the public. These are included in the statistical results shown above, and are summarised below.

3 – Do you agree or disagree with the Lincolnshire Waste Partnership's vision for this Strategy?
3 x Strongly agree (1 further partner said "strongly agree" in their non-questionnaire response) 1 x Agree 1 x Disagree – "Not specific enough"
4 – Are there any key issues, other than those we have identified, which should be driving our Waste Strategy?
2 x No 3 x Yes – Include: <ul style="list-style-type: none"> • Containing costs/maximising income • Education and regular information to the public • Wider national and global picture and circular economy • Managing expectations of increasing recycling rate whilst budgets are increasingly stretched • Waste minimisation and packaging reduction
5 – Do you agree or disagree that the objectives we have set out will enable us to meet the challenges we face and therefore achieve our vision?
1 x Strongly agree 2 x Agree 2 x Disagree – Need specific actions & targets
6 – Do you agree or disagree that our Forward Plan, as described in Chapter 7, contains all the actions we need to achieve our objectives?
3 x Agree 2 x Disagree – Need specific action plan
7 – Do you have any specific concerns about the strategy?
5 x Yes – We need a specific action plan & targets
8 – Do you think the draft strategy could have a positive or negative impact on you (or someone you care for or support) due to any of the following?
No specific impacts identified
9 – Does the Environmental Report correctly identify the likely significant effects of the draft Joint Municipal Waste Management Strategy?
2 x Yes 3 x No – Need action plan and identification of specific infrastructure first
10 – Do you agree or disagree that the draft JMWMS has sufficiently taken account of the information provided in the Environmental Report?
5 x Agree – Although may need reassessing when Action Plan is developed

Comments made by each partner, including those provided in the form of the questionnaire, are grouped together by theme below.

Overall strategy	
Multiple similar responses	<ul style="list-style-type: none"> • Strategy and actions need to be agile to react to changes • Be customer-friendly / customer satisfaction • Ensure we consider the future, not just the present • Programme in a JMWMS review • Need "circular economy" thinking
Other responses	<ul style="list-style-type: none"> • Seek innovative ideas by looking for new ideas and technologies • Include section on "lessons learned" from previous JMWMS and action plan • Need more detailed review of previous (2008) JMWMS and lessons learned • Include more national and global context • Need to reflect rising costs due to waste growth

Specific sections	
Multiple similar responses	<ul style="list-style-type: none"> • Need a specific action plan with timelines • Objectives to be more committed – "we will" rather than "consider"
Other responses	<ul style="list-style-type: none"> • Vision to say "Lincolnshire people" • Vision not specific enough • Add an objective on waste minimisation • Change Objective 8 from "residual waste" to "all waste"
Recycling collections	
Multiple similar responses	<ul style="list-style-type: none"> • Need harmonising (nationally?) • Simpler collection system/mix • Kerbside collections of batteries and WEEE
Other responses	<ul style="list-style-type: none"> • Collect glass separately • More enforcement against contamination • Consider how to handle textiles
Lobbying	
Multiple similar responses	<ul style="list-style-type: none"> • Manufacturers/government to reduce packaging
Other responses	<ul style="list-style-type: none"> • Use fewer types of plastic • Deposit Return Schemes for plastics are a good thing, so support them
Food waste	
Multiple similar responses	<ul style="list-style-type: none"> • Food waste collections a good thing • Trial data important • Food waste collections need to be backed by education campaign • Needs proper consideration of funding of separate collections
Other responses	<ul style="list-style-type: none"> • Encourage food waste minimisation
Education	
Multiple similar responses	<ul style="list-style-type: none"> • Need better engagement with the public • Promote waste hierarchy, including reduction and reuse • Need simple and consistent messages • Education through schools
Other responses	<ul style="list-style-type: none"> • How to reach "Houses in Multiple Occupation"? • Locally-targeted campaigns • Incentivise residents to recycle more • Add an objective on education • Change public perception of "landfill bin" with a better word than "residual"
Disposal & processing	
Multiple similar responses	<ul style="list-style-type: none"> • Consider using out-of-county facilities
Other responses	<ul style="list-style-type: none"> • Use anaerobic digestion for food waste and garden waste • Use/develop local sites • Consider disposal options to handle population/waste growth • Maximise energy use from new and existing EfW facilities
Funding	
Multiple similar responses	<ul style="list-style-type: none"> • Make clearer that Council funding is reducing and services need to contain costs
Other responses	<ul style="list-style-type: none"> • Ensure value for money to the public • Decide on the balance between costs and "doing the right thing environmentally"

Other	
Multiple similar responses	<ul style="list-style-type: none"> • Better partnership working (including with neighbours?) • Review of HWRC provision (including cross-border arrangements?) • Review LWP governance model • Regular monitoring and reporting of performance
Other responses	<ul style="list-style-type: none"> • Specific data needs reviewing or updating • On-street recycling bins • Healthcare waste should be NHS responsibility • Need to better understand why recycling rates are falling • Need to review equality impacts and SEA when action plan has been developed • Support commercial waste collections • Move away from a specific recycling target

Statutory Consultees

As part of the Strategic Environmental Assessment process, we are required to consult with the Environment Agency, Natural England and Historic England. None of them raised any specific concerns regarding either the draft Environmental Report or the draft JMWMS.

From others

The following summarises the comments which were submitted to the consultation. **Every** comment has been read individually but, due to the varied nature and sometimes personal nature of the individual responses, they are here summarised into themes.

Themes mentioned by 10 or more people included:

Theme	Type(s) of response
Care for the environment	<ul style="list-style-type: none"> • An important thing to include • Not enough mention of climate change and carbon reduction • Seek to recycle more
Value for money	<ul style="list-style-type: none"> • An important thing to include • Councils need to think and act more commercially • Lobby government for more funding rather than raise Council Tax
Balancing environment and cost	Opinion was divided between: <ul style="list-style-type: none"> • Take the cheapest option rather than put up Council Tax • Do the right thing environmentally regardless of cost
Include more direct and ambitious actions	<ul style="list-style-type: none"> • Draft JMWMS doesn't identify enough specific actions • Whole JMWMS needs to be more ambitious • Set clear targets
Improve communications/education	<ul style="list-style-type: none"> • What to put in which collection • Especially important if services change
Waste reduction/packaging	<ul style="list-style-type: none"> • Not enough mention of waste reduction • Lobby national government for new legislation • Take action locally

Theme	Type(s) of response
Food waste collections	Opinion was divided between: <ul style="list-style-type: none"> • They are a good thing – e.g. Better environmentally • They are a bad thing – e.g. Smell; costly to run; inconvenient
Customer friendly services	<ul style="list-style-type: none"> • Simpler recycling system • Need consistent services across the county • Ensure services are accessible to all, especially the elderly and disabled
HWRC improvements	<ul style="list-style-type: none"> • More reuse, especially by "people in need" • Improve site layout • Open more sites and for longer hours to combat flytipping • Accept extra materials – e.g. tyres; asbestos • Allow/arrange use of sites outside of county

Conclusion

The JMWMS has been reviewed and, where necessary, updated in line with the comments received through the consultation process. The majority of this list matches the above summary of public responses, as these are also broadly in line with responses from LWP partners. Where partners raised additional items, these are added at the foot of this table.

Theme	How revised JMWMS reflects this
Care for the environment	<ul style="list-style-type: none"> • Text added to back up the objective on carbon reduction • Action Plan to include assessment of carbon footprint
Value for money	<ul style="list-style-type: none"> • Already a strong focus of the draft JMWMS so no change
Balancing environment and cost	<ul style="list-style-type: none"> • Given the mixed views expressed as to which should take priority, the revised JMWMS clarifies the LWP's intention to choose the best environmental option that we can afford. Any service changes will thus need to reflect this.
Include more direct and ambitious actions	<ul style="list-style-type: none"> • Action Plan produced to accompany JMWMS
Improve communications/education	<ul style="list-style-type: none"> • Included in Action Plan
Waste reduction/packaging	<ul style="list-style-type: none"> • Text added to make more reference to this
Food waste collections	<ul style="list-style-type: none"> • Action Plan includes a trial to get better information for an informed decision
Customer friendly services	<ul style="list-style-type: none"> • Collections under review through Action Plan • Any proposed service changes will consider accessibility to all
HWRC improvements	<ul style="list-style-type: none"> • HWRC services to be reviewed
Additional items raised by LWP partners	
Reporting and review	<ul style="list-style-type: none"> • Chapter 8 has been revised to be more specific on this
Disposal and processing	<ul style="list-style-type: none"> • More information added on future options to be considered

Objective	Lincolnshire County Council (LCC) position	North Lincolnshire Council (NLC) response
Objective 1.	To improve the quality and therefore commercial value of our recycling stream.	NLC agrees that in light of current external pressures from world markets on the quality and value of recyclable materials greater emphasis has to be placed on the whole value chain starting with collections from residents. Consideration needs to be given to the local public sector reliance on third party processors and whether municipal ownership of such facilities is more in the public interest to derive the highest benefit for our residents.
Objective 2.	To consider moving towards a common set of recycling materials.	NLC agrees that a common set of recycling materials will make communications with residents easier, could derive economies of scale for collections and enable standardised reprocessing facilities which will help reduce costs and contamination.
Objective 3.	To consider the introduction of separate food waste collections.	The separate collection of food waste has different financial models for different councils due to their particular mix of urban and rural areas. NLC notes that the requirement for separate biowaste collections by 2023 in the EU Circular Economy Package will be included within the transposition into UK law by each devolved administration and awaits the detail of the legislation and any government guidance.
Objective 4.	To explore new opportunities of using all waste as a resource in accordance with the waste hierarchy.	The transposition of the EU Circular Economy Package should provide a legislative impetus to this and NLC awaits the detail of the legislation and any government guidance.
Objective 5.	To contribute to the UK recycling target of 50% by 2020.	NLC notes the higher targets included within the EU Circular Economy Package of 55% by 2025 which is included within the operational lifetime for this revised strategy. Our own strategy for achieving and increased target will be considered once the legislation transposing the EU Circular Economy Package is published.
Objective 6.	To find the most appropriate ways to measure our environmental performance, and set appropriate targets.	NLC agrees that the current methodology of measuring by weight (tonnage) does promote the collection of some recyclable materials (garden waste) over others that have a greater impact on the environment and resource sustainability (plastics) due to their respective weights. As all comparative measures of performance have to be consistent across the UK and EU it will be informative to see how this debate resolves itself particularly with regard to the higher recycling targets proposed within the EU Circular Economy Package.

Objective 7.	To seek to reduce our carbon footprint.	It is unfortunate that efforts by local councils to reduce the production of greenhouse gases by moving to alternative disposal technologies to replace landfilling were not recognised and accounted for in UK carbon measurement and performance assessment. As such our ability to positively influence our carbon footprint from a waste management perspective is limited to the transport impact of our operations which is not the greatest contributory factor. NLC recognises the difficulty that LCC will face given these issues.
Objective 8.	To make an objective assessment of whether further residual waste recovery/disposal capacity is required and, if necessary, seek to secure appropriate capacity.	NLC recognises the difficulty of making long term waste and recycling tonnage predictions given the impact of sudden events such as the credit crunch, volatile changes on world recycling markets and significant changes in the English legislative position (LATS). Business cases and assumptions that were sound and evidenced in the 2000's have been abandoned in recent years. NLC remains committed to working with LCC in considering and developing joint infrastructure assets where there is mutual benefit and to provide resilience against such events in the future.
Objective 9.	To regularly review the LWP governance model in order to provide the best opportunity to bring closer integration and the implementation of the objectives set by the strategy.	NLC recognises the challenges faced by LCC in a two tier local government structure. NLC remains committed to working with LWP in considering and developing joint infrastructure assets where there is mutual benefit and to provide resilience against such events in the future.
Objective 10.	To consider appropriate innovative solutions in the delivery of our waste management services.	NLC notes the strategic actions identified by LCC in Table 7.1 of the draft strategy and agrees that these are the best choices to underpin this objective.

The LWP notes NLC's general support for this JMWMS and will take into account the points made, particularly:

- Their support for the consideration of municipal ownership of waste facilities, along with their interest in developing joint infrastructure assets;
- Their interest in the concepts of a harmonised recycling mix and alternative measures for environmental performance; and
- The references to the updated contents of the EU Circular Economy Package, which are reflected in this revised JMWMS.

Nottinghamshire County Council

"Nottinghamshire County Council welcomes the vision and aspirations set out within the draft strategy and future opportunities to share best practice and experience amongst local authorities.

The County Council does not have any formal comments to make at this stage but would be grateful to be kept informed of progress with the strategy and the development of specific action plans in support of the strategy."

The LWP notes NCC's general support for this JMWMS. We will indeed continue to liaise with them regarding progress both with our own strategic developments and with theirs.

Appendix D – Initial Action Plan

As described throughout this JMWMS, and as requested in numerous responses to the Public Consultation, this Action Plan sets out the actions which the LWP will undertake to work towards the Objectives which have been set.

This appendix contains the initial Action Plan, including the dates by which each task will be completed. It should be noted that some of the dates listed are before the adoption of the final version of this JMWMS. That is because work is already underway on workstreams which are unlikely to change in the closing stages of the development of the Strategy.

The Action Plan will be reviewed regularly in order to ensure it remains up to date in response to:

- Whether the actions being undertaken are helping us to achieve our Objectives; and
- Any changes in legislation or other strategic drivers.

Ref	Action	Objectives Supported	Key Dates	KPI/ Targets	Expected Outcome/Update
1	Strategic Review of Kerbside Mixed Dry Recycling Collection and Disposal	1,2,4,5,7,8 and 10	<p>12th July 2018 – Initial Feedback to Lincolnshire Waste Partnership.</p> <p>End September 2018 – Initial review completed and reported to Lincolnshire Waste Partnership</p>	<p>Satisfaction with waste/recycling services by council - targets to be continuous improvement on base line performance.</p> <p>Recycling and composting rate by council- target to be agreed, but to reach a minimum of 50% by 2020.</p> <p>Reduction in baseline Mixed Dry Recycling contamination rate (27%).</p> <p>Reduction in carbon footprint from 2017/18.</p>	<p>To have a clear way forward on what is being collected and new contract in place for 2020.</p> <p>A consistent harmonised Mixed Dry Recycling mix across all Waste Collection Authorities.</p> <p>A common message on Mixed Dry Recycling that can be used by all partners and a clear communications campaign.</p> <p>A Mixed Dry Recycling contract in place flexible enough to reward commercial value of reducing contamination rates and non-target materials.</p> <p>Improved recycling rate over current baseline.</p>
1.01	Evaluation of the current volumes/weights of waste going to the Energy from Waste facility and to Materials Recovery Facilities and assessing the impact or difference on the factors above should kerbside collection waste streams be adjusted and/or harmonised.		Complete	<p>Produce a table and analysis for the factors impacting the waste streams.</p> <p>Officer Working Group to recommend to the Lincolnshire Waste Partnership what the mix should be and what is achievable.</p>	Findings to be presented to the Officer Working Group on the 8 th August 2018 with recommendations.

Ref	Action	Objectives Supported	Key Dates	KPI/ Targets	Expected Outcome/Update
1.02	Outline infrastructure and capital costs of implementing these adjustments to the Waste Collection Authorities and Waste Disposal Authority.		Complete	Full costings to be reported to Lincolnshire Waste Partnership with recommendations on the way forward.	
1.03	Assessment of the Materials Recovery Facility/Recycling market for Mixed Dry Recycling through soft market testing and direct market engagement, to identify potential suppliers to handle the Mixed Dry Recycling mix proposed and if so at what cost compared to current arrangements.		Results of soft market testing July 2018. Procurement timeline key for understanding the mix from April 2020.	What the Mixed Dry Recycling mix is going to be needs to be agreed as soon as possible before new contract to commence in 2020.	Officer Working Group to agree the mix and report to the Lincolnshire Chief Executives meeting in September 2018 and Lincolnshire Waste Partnership with the recommendations.

Ref	Action	Objectives Supported	Key Dates	KPI/ Targets	Expected Outcome/Update
1.04	Assessment of the public information and education campaign required to support effective implementation of a revised/harmonised Mixed Dry Recycling mix.		End September/ early Oct 2018 for sticker campaign to go on all bins across Lincolnshire to address the main contaminants.	<p>Satisfaction with waste/recycling services by council - targets to be continuous improvement on base line performance.</p> <p>Recycling and composting rate by council- target to be agreed, but to reach a minimum of 50% by 2020. To be revised periodically to meet national targets.</p> <p>To aid the recycling rate this is key marketing if the Mixed Dry Recycling mix changes.</p> <p>Improved recycling rate, satisfaction levels across the County remain high with residents and the message is clear.</p>	<p>Improved awareness of what can/cannot be recycled, so as to align with the strategy document and agreement on a new Mixed Dry Recycling mix.</p> <p>Greater participation in recycling/composting schemes.</p> <p>Improving satisfaction with Council services.</p> <p>Lincolnshire Waste Partnership agreed short term that stickers should be produced for across the County saying NO to the main contaminants.</p> <p>A communications campaign to go alongside the sticker end Sept to tie in with National Recycling week.</p>
1.05	Feasibility of building a Materials Recovery Facility outline cost estimates.		To be confirmed by Lincolnshire Waste Partnership.	Business case to be completed before being considered by the Lincolnshire Waste Partnership in November 2018.	Decision to be made by Partnership after the business case discussed.
1.06	Feasibility of having a dirty Materials Recovery Facility or more.		20th July 2018.	Business case to be completed before being considered by the Lincolnshire Waste Partnership.	Findings to be presented to the Officer Working Group initially on the 8 th August 2018.
1.07	Proposals for dealing with other recyclables at the kerbside such as textiles, batteries, household electrical items, batteries etc		To be confirmed	To be agreed.	To be agreed.

Ref	Action	Objectives Supported	Key Dates	KPI/ Targets	Expected Outcome/Update
1.08	To tackle contamination in our current recycling stream, between now and when the Mixed Dry Recycling contract is re-let in 2020, develop an effective, simple public communication campaign.		End Sept 2018 all bins in the County to have a sticker on the recycling bin to try and reduce contamination.	<p>To aid the recycling rate by targeting the contamination.</p> <p>The levels of contamination to be monitored monthly to see if there is a decrease following the sticker campaign.</p> <p>Communications plan required around this as also need to join up the message that is being delivered locally and Nationally.</p>	<p>Improved recycling rate, satisfaction levels across the County remain high with residents and the message is clear through communications campaign.</p> <p>Reduction to the 27% contamination rate.</p>

Ref	Action	Objectives Supported	Key Dates	KPI/ Targets	Expected Outcome/Update
1.09	Secure expert input from: <ul style="list-style-type: none"> Waste and Resources Action Programme (WRAP) Communications teams 		Procurement underway, consultants appointed end of August 2018. Inception meeting 5th September 2018. Project timeline amended to final report late 2018.	Further develop the Baseline to include predicted waste growth over 5 and 10 years.	<p>An assessment of the impact of the two stream collection methodology (separate paper/separate food) against the baseline and in 5 and 10 years could this be three stream i.e. Food, Paper / card and Cardboard and others (plastic bottles, glass containers etc).</p> <p>An assessment of the impacts of alternative 'two-tier' cost sharing options on the member authorities of the Lincolnshire Waste Partnership.</p> <p>A high-level assessment of the options available to the Waste Disposal Authority for the provision of residual treatment / disposal facilities over and above those provided by the North Hykeham Energy from Waste facility.</p> <p>A high-level assessment of the service delivery options available to the Waste Disposal Authority with a view to maximising the financial benefit that can be accrued from alternative disposal technologies (e.g anaerobic digestion of separately collected food waste) for an agreed range of household waste streams.</p>
1.10	Research what has worked elsewhere: <ul style="list-style-type: none"> Positive – i.e. What to put in? Negative – i.e. What to leave out? 		Some of this information will come from the soft market testing.		<p>Clearer understanding gained to support the Mixed Dry Recycling mix.</p> <p>Follow-up meetings being held with report to Officer Working Group in Sept 2018.</p>

Ref	Action	Objectives Supported	Key Dates	KPI/ Targets	Expected Outcome/Update
1.11	Review of the Household Waste Recycling Centres		November 2018	Review the existing arrangements across the County and look at the feasibility of more Centres if required.	From the consultation it was a theme that the public want opening hours extended at current Centres and the possibility of more across the County.
2	Food Waste Trial	1,2,3,4,5,7,8 and 10	12th Jul 18 – Initial Feedback to Lincolnshire Waste Partnership. 22nd Nov 18 – Detailed Feedback to Lincolnshire Waste Partnership	Measure number of residents in the trial. Measure the amount of waste collected and reduction in recycling contamination. Access the Mixed Dry Recycling contamination.	Inform decision making about future collection and disposal options by assessing the available options during the trial to ensure momentum is maintained, including the recent Waste and Resources Action Programme (WRAP) work. Determine the service’s impact on households’ waste and recycling habits, especially volumes of food in other waste streams. Assess the impacts of cleaning up the Mixed Dry Recycling contamination.
2.01	Trial commences in South Kesteven area.		4 th June 18	Maximise participation and understand households’ motivations for the trial. Measure the amount of food waste collected and determining if there is any reduction in the recycling contamination or quantity of residual waste presented. Determine the most effective messages and communications channels.	Clearer understanding of food waste on recyclables and weights of residual. Weekly tonnages and composition analyses being undertaken.
2.02	Initial results reported to Lincolnshire Waste Partnership.		12 th July 18	Give an update on the 1st month’s figures from the trial.	Report presented to Lincolnshire Waste Partnership. on the 12 July 2018. Completed task.

Ref	Action	Objectives Supported	Key Dates	KPI/ Targets	Expected Outcome/Update
2.03	Detailed report to Lincolnshire Waste Partnership.		22 nd November 18	Report with all of the measurements for how/if the scheme has been successful including costs and savings.	The Lincolnshire Waste Partnership to receive information regarding the success or not of the trial. If successful, defining the extent of the food waste roll-out.
2.04	Investigate expanding the trial to other areas in South Kesteven or discuss with other Districts a trial and costs for this piece of work.		Early 2019	Fully costed options to look at expanding the food waste trial either into South Kesteven or other Districts.	Meeting to be arranged in September 2018 with Lincolnshire County Council and South Kesteven.
3	Strategic Review of Options for Continuous Improvement for Waste Collection and Disposal Arrangements in Lincolnshire	7,8,9 and 10	Early 2019 – Feedback to Lincolnshire Waste Partnership & Lincolnshire Chief Executives Group	What are the benefits for this theoretically to identify an ideal solution without current restraints.	To show the most effective and financially viable way of collecting and disposal of waste throughout the County.
3.01	Initial analysis by Lincolnshire Waste Partnership and the Officer Working Group using Design Council methodology.		May 18		
3.02	Further analysis by Lincolnshire Waste Partnership and the Officer Working Group using Design Council methodology		21 st September 2018		
3.03	Interim update reported to Lincolnshire Waste Partnership & to Chief Executives Group		October 2018		

Ref	Action	Objectives Supported	Key Dates	KPI/ Targets	Expected Outcome/Update
3.04	Further update reported to Lincolnshire Waste Partnership & to Chief Executives Group		Early 2019		
4	Location of additional processing/disposal sites	7,8 and 10	November 2018 – Feedback to Lincolnshire Waste Partnership & Chief Executives Group	<p>Initial assessment of users within Lincolnshire</p> <p>Provide a map and short report on the main areas</p> <p>Report outputs to Lincolnshire Waste Partnership and obtain direction on what this information will be used for</p>	To support the feasibility of another Energy from Waste plant if required.
4.01	A review of the previous report by Element Energy on the data gathered in the consideration of energy mapping within the Greater Lincoln area.			Draft short brief for Element to look at the wider area and obtain a quote and timeline for this piece of work.	Locations to be ranked for suitable areas for a new Energy from Waste plant.
4.02	Evaluating the Lincolnshire Enterprise Partnership work around utility infrastructure with our expected waste infrastructure work.		Delivery of findings by November 2018	<p>Energy mapping work for Greater Lincolnshire Enterprise Partnership completed.</p> <p>Energy Strategy for the Greater Lincolnshire Enterprise Partnership out for consultation.</p>	Energy Strategy and Local Industrial Strategy Energy Components out for consultation.

Ref	Action	Objectives Supported	Key Dates	KPI/ Targets	Expected Outcome/Update
5	Choosing performance indicators appropriate to measure environmental performance.	7 and 6	Sept 2018	Carbon footprint baseline review. Review of existing Performance Indicators.	The need for this came through in the consultation as a need to understand the Carbon footprint baseline so that it can be monitored effectively. To produce a suite of Performance Indicators that can then be effectively produced and reported to the Lincolnshire Waste Partnership.
5.01	Evaluate the current information around carbon footprint		Sept 2018	Once the baseline has been established this the Officer Working Group can then look at targeting reduction and a communication plan.	Outcomes of the consultation was that this needs to be a priority of the Strategy therefore an understanding of the baseline and targeting reducing this is key.
5.02	Review the existing Key Performance Indicators to ensure fit for monitoring the Strategy outcomes		Sept 2018	Looking at what was previously measured and aligning new targets to the outputs of the Strategy.	Have new Key Performance Indicators that are Specific, Measurable, Attainable, Relevant and Timely.

Appendix E – Glossary of Terms & Abbreviations

Term	Abbrev.	Description
Alternate Weekly Collections	AWC	Typically, the collection of household residual wastes every other week, whilst during the intervening weeks recyclables and/or green wastes are collected.
Anaerobic Digestion	AD	A process by which microorganisms break down biodegradable material in the absence of oxygen.
Biodegradable Municipal Waste	BMW	Those elements of the municipal waste streams that will rot or degrade biologically.
Controlled Waste Regulations	CWR	UK legislation categorising waste by contents and/or source.
Department for Environment, Food & Rural Affairs	Defra	UK government department responsible for waste management (amongst other things).
Energy from Waste	EfW	Any renewable energy technology that recovers energy from waste.
Household Waste	HW	Waste from domestic properties including waste from residual refuse collections, material collected for recycling and composting, plus waste from educational establishments, nursing and residential homes and street cleansing waste.
Household Waste Recycling Centre	HWRC	A place at which the public may deposit their household waste
(Joint) Municipal Waste Management Strategy	(J)MWMS	Also referred to in this document simply as "the Strategy". It is a statutory duty for local authorities in two-tier areas to have a Joint MWMS.
Landfill Allowance Trading Scheme	LATS	An initiative by the UK government to help reduce the amount of BMW sent to landfill. Abolished in 2013.
Lincolnshire Waste Partnership	LWP	Also referred to in this document simply as "the Partnership". Brings together the public bodies within Lincolnshire responsible for collection and disposal of waste.
Local Authority Collected Waste	LACW	Any waste collected by a local authority. Formerly known as "Municipal Waste".
Minerals and Waste Local Plan	MWLP	Sets out: <ul style="list-style-type: none"> the key principles to guide the future winning and working of minerals and the form of waste management in the county; and the criteria against which planning applications for minerals and waste development will be considered.
Municipal Solid Waste	MSW	A waste type consisting of everyday items that are discarded by the public.
National Indicator	NI	One of a list of indicators used to measure local authority performance. Stopped being statutory from April 2011.

Term	Abbrev.	Description
National Planning Policy Framework	NPPF	Introduced in March 2012, sets out the Government's overarching planning policies for England
National Planning Policy for Waste	NPPW	Introduced in December 2013, sets out the national framework for planning for waste management
Office of the Deputy Prime Minister	ODPM	Former UK government department with responsibility for some aspects of waste management (amongst other things).
Putrescible waste		The component of the waste stream liable to become putrid. For example: organic matter that has the potential to decompose with the formation of malodorous substances, usually refers to vegetative, food and animal products.
Recycling Credits		Statutory payments made by the WDA to a WCA which makes its own arrangements for the recycling of waste which it has collected.
Strategic Environmental Assessment	SEA	A formal assessment of the environmental effects of a strategic document.
Technically, environmentally and economically practicable	TEEP	A formal assessment of whether an individual option can reasonably be achieved. Found in several pieces of waste legislation.
Waste Collection Authority	WCA	A local authority with the duty to collect specified wastes (including household waste). There are seven WCA's covering the LWP area: Boston Borough Council, City of Lincoln Council, East Lindsey District Council, North Kesteven District Council, South Holland District Council, South Kesteven District Council and West Lindsey District Council
Waste Disposal Authority	WDA	A local authority with the duty to operate HWRC's and to dispose of waste collected by WCA's in its area. There is one WDA covering the LWP area: Lincolnshire County Council.
Waste Planning Authority	WPA	A local authority with the duty to collect specified wastes (including household waste). There are seven WCA's covering the LWP area.
Waste Regulatory Authority	WRA	Has responsibility for ensuring compliance with waste legislation. In England this is the Environment Agency.
Waste and Resources Action Programme	WRAP	A government-sponsored organisation promoting recycling and other waste issues.



Lincolnshire County Council

JOINT MUNICIPAL WASTE MANAGEMENT STRATEGY

Strategic Environmental Assessment
Environmental Report





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ABBREVIATIONS

AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Area
CHP	Combined Heat and Power
CO2	Carbon Dioxide
DCLG	Department for Communities and Local Government
DPD	Development Plan Document
EfW	Energy from Waste
GHG	Greenhouse Gas
GVA	Gross Value Added
ha	Hectare
HRA	Habitats Regulation Assessment
IDP	Infrastructure Development Plans
ILO	International Labour Organisations
IMD	Index of Multiple Deprivation
JMWMS	Joint Municipal Waste Management Strategy
Kt	Kiloton
LCA	Landscape Character Area
LCC	Lincolnshire County Council
LEA	Local Economic Assessment
LIGHT	Lincolnshire Green Heat Scheme
LNR	Local Nature Reserve
LSOAs	Lower Super Output Areas
LTP4	Local Transport Plan
LWP	Lincolnshire Waste Partnership
MCZ	Marine Conservation Zones
MSW	Municipal Solid Waste
Mt	Megaton
NAA	Nitrate Advisory Areas
NAQS	National Air Quality Strategy
NIA	Noise Important Areas
NNR	National Nature Reserve
NO _x	Nitrogen Oxides
NO2	Nitrogen Dioxide
NSA	Nitrate Sensitive Areas
ONS	Office of National Statistics
PM10	Particulate Matter

PPP	Plans, Policies and Programmes
PUA	Principal Urban Area
SA	Sustainability Appraisal
SAC	Special Areas of Conservation
SAM	Scheduled Monument
SEA	Strategic Environmental Assessment
SOAs	Super Output Areas
SPA	Special Protection Areas
SSSIs	Sites of Special Scientific Interest
SUDS	Sustainable Urban Drainage System
UK	United Kingdom

NON-TECHNICAL SUMMARY

INTRODUCTION

Two-tier areas such as Lincolnshire, where waste collection is the responsibility of the district, borough or city council and waste disposal is the responsibility of the county council, are required to have a joint strategy for the management of municipal waste. These waste management strategies are required to be reviewed every 5 years. Lincolnshire County Council (LCC) is a member of the Lincolnshire Waste Partnership (LWP) which is a body formed of LCC, the Environment Agency (EA) and the seven district, borough and city councils within Lincolnshire.

Strategic Environmental Assessment (SEA) is a process of undertaking an environmental assessment of plans and programmes. WSP has been commissioned by Lincolnshire County Council to undertake a SEA of the replacement Joint Municipal Waste Management Strategy (JMWMS).

This Environmental Report (including this non-technical summary) sets out the SEA of the Lincolnshire County Council JMWMS.

SEA METHODOLOGY

The approach adopted for the SEA of the JMWMS follows that set out in the Practical Guide to SEA¹ and the Planning Practice Guidance to SEA².

The key stages of the SEA process are the following:

- Stage A: Scoping
- Stage B: Assessment
- Stage C: Reporting
- Stage D: Consultation
- Stage E: Monitoring

SCOPING

Scoping involves the development of an assessment framework comprising a series of SEA Objectives, assessment criteria and indicators. This framework is developed from an understanding of environmental problems and opportunities identified through a review of existing baseline information and a review of other plans, programmes and environmental protection objectives relevant to the plan area (i.e. Lincolnshire and its neighbours) and subject matter (in this case, waste).

¹ Office of the Deputy Prime Minister (2005) A Practical Guide to the Strategic Environmental Assessment Directive [online] available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf (Accessed October 2017).

² Department for Communities and Local Government (2015) Strategic Environmental Assessment and Sustainability Appraisal [online] available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

ENVIRONMENTAL ASSESSMENT

The LWP considers that the retention of the existing JMWMS is unlikely to continue to reflect Lincolnshire's needs into the future since it would not take account of recent changes in national and local government budgets or policies and changes in the way waste services are delivered (such as with new technologies or processes).

In environmental terms, there is likely to be little difference between the two strategic options considered. There is no evidence to indicate that the current JMWMS is having negative environmental effects. That said, the existing JMWMS may not be addressing local environmental issues (which are likely to differ across the county).

The development of a new JMWMS would allow stronger provision for the uptake of new waste management technologies/processes to be made which, in general terms, could lead to an environmental benefit.

The assessment has determined that there is the following potential for environmental effects:

- The introduction of a common set of recycling materials is likely to have a significant positive effect in relation to the sustainable use of resource through effective waste management;
- Exploring the use of waste as a resource via the waste hierarchy is likely to have a significant positive effect in relation to the circular economy and the sustainable use of resource through effective waste management;
- Contributing to the UK's recycling target is likely to have a significant positive effect in relation to the circular economy; and
- Seeking to reduce carbon emissions from energy use is likely to have a significant positive effect in relation to carbon emissions.

There are also some unknown effects relating to:

- The effect of separate food waste collections on biodiversity, opportunities for recycling within residential developments, the historic environment and the Lincolnshire countryside; and
- Innovative solutions in the delivery of waste management services.

MITIGATION

There is some potential for adverse effects resulting from the JMWMS. For this reason, a set of precautionary mitigation measures are proposed. These are set out in Section 5 of the report.

MONITORING

A programme of monitoring is proposed so that unforeseen significant effects of implementation can be identified and remedial action taken. Monitoring also measures the performance of the JMWMS against environmental objectives and targets. A set of proposed monitoring indicators is set out in Chapter 5 of the report.

1 INTRODUCTION

1.1 BACKGROUND TO THE JOINT MUNICIPAL WASTE MANAGEMENT STRATEGY

1.1.1. Lincolnshire County Council (LCC) is a member of the Lincolnshire Waste Partnership (LWP) which is a body formed of LCC, the Environment Agency (EA) and the seven districts, borough and city councils within Lincolnshire:

- Boston Borough Council;
- City of Lincoln Council;
- East Lindsey District Council;
- North Kesteven District Council;
- South Holland District Council;
- South Kesteven District Council; and
- West Lindsey District Council.

1.1.2. The Waste and Emissions Trading Act 2003 requires two-tier areas such as Lincolnshire to have a joint strategy for the management of municipal waste in place. Waste Management Strategies require a review every 5 years to ensure that they remain current³.

1.1.3. The current JMWMS for Lincolnshire was published by the LWP in June 2008 with the aim of providing information on the following:

- The current and future legal obligations that the LWP needs to meet;
- The waste management services that are currently provided;
- How the LWP plans to meet the targets by reducing the amount of waste that is produced, increasing the amount of waste that is recycled and recovered, and minimising the amount of residual waste that is landfilled; and
- How the LWP plans to implement this strategy.

1.1.4. Since 2008, Lincolnshire has made significant progress towards achieving these aims through securing a 25 year contract with FCC Environment in March 2011. This contract is for the disposal of residual Municipal Solid Waste (MSW) and constructing a 150,000 tonne per annum Energy from Waste (EfW) facility at North Hykeham in Lincoln. The EfW facility became fully operational in 2014 and waste going to landfill has dropped from 168,000 tonnes in 2009 to less than 15,000 tonnes after the site became fully operational⁴.

1.1.5. The review of the current JMWMS was put on hold when it appeared that legislation would itself be reviewed. The legislative review has not yet happened but a revised waste strategy is now necessary to address the present waste management challenges in Lincolnshire and to address its future needs. The latest Joint Municipal Waste Management Strategy (JMWMS) is currently in preparation by the LWP, led by LCC.

1.1.6. This Environmental Report summarises the results of the Strategic Environmental Assessment (SEA) for the JMWMS.

1.2 THE JOINT MUNICIPAL WASTE MANAGEMENT STRATEGY

1.2.1. The JMWMS seeks to provide a mechanism by which joint working by the districts, borough and city councils and LCC, as well as the EA, can be achieved to deliver sustainable waste management services and establish best value waste management practices. The framework provided by the JMWMS allows the LWP to continually improve the waste services offered, minimise costs and meet challenging recycling and landfill diversion targets.

1.2.2. The LWP has the vision:

³ Defra, Guidance on Municipal Waste Management Strategies, July 2005

⁴ Lincolnshire's Energy from Waste Facility. Available at: <https://www.lincolnshire.gov.uk/recycle-for-lincolnshire/energy-from-waste/> (Accessed July 2017)

‘To seek the best environmental option to provide innovative, customer-friendly waste management solutions that give value for money to Lincolnshire’.

1.2.3. In order to work towards this vision, the LWP has also developed and agreed a set of high-level objectives which are listed in Table 1. These objectives are key drivers for the delivery of this strategy. In line with the vision, each of these objectives is to be considered in light of the LWPs shared value that:

‘All objectives should ensure that services provided under the JMWMS represent the best possible environmental option which gives value for money for Lincolnshire residents.’

Table 1 – LWP Objectives

1	To improve the quality and therefore commercial value of our recycling stream.
2	To consider moving towards a common set of recycling materials.
3	To consider the introduction of separate food waste collections.
4	To explore new opportunities of using all waste as a resource in accordance with the waste hierarchy.
5	To contribute to the UK recycling target of 50% by 2020.
6	To find the most appropriate ways to measure our environmental performance and set appropriate targets.
7	To seek to reduce our carbon footprint.
8	To make an objective assessment of whether further residual waste recovery/disposal capacity is required and, if necessary, seek to secure appropriate capacity.
9	To regularly review the LWP governance model in order to provide the best opportunity to bring closer integration and the implementation of the objectives set by the strategy.
10	To consider appropriate innovative solutions in the delivery of our waste management services.

1.3 THE SEA PROCESS

1.3.1. Strategic Environmental Assessment (SEA) is the term used to describe the application of environmental assessment to plans and programmes in accordance with European Council Directive 2001/42/EC ‘on the assessment of the effects of certain plans and programmes on the environment’ (known as the SEA Directive).⁵ The SEA Directive is enacted in England through the “Environmental Assessment of Plans and Programmes Regulations” (SI 2004/1633, known as the SEA Regulations).⁶

These Regulations introduced a requirement for an SEA to be produced for a number of statutory plans and programmes, including Waste Management Plans. Bodies such as the LWP should ensure that the SEA is an integral part of developing, and later delivering, their Local Waste Plan.

1.3.2. The overarching objective of the SEA Directive is:

“To provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans... with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out of certain plans... which are likely to have significant effects on the environment.” (Article 1)

1.3.3. The main requirements introduced by the SEA Regulations are that:

⁵. Directive 2001/42/EC [online] available at: <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32001L0042> (Accessed October, 2017).

⁶. SI 2004 No. 1633, The Environmental Assessment of Plans and Programmes Regulations 2004 [online] available at: http://www.legislation.gov.uk/ukSI/2004/1633/pdfs/ukSI_20041633_en.pdf (Accessed October, 2017).

- Consultation with statutory bodies is undertaken on the scope of the SEA;
 - The findings of the SEA are published in an Environmental Report, which sets out the significant effects of the plan;
 - Consultation is undertaken on the plan and the Environmental Report;
 - The results of consultation are taken into account in decision-making relating to the adoption of the plan; and
 - Information on how the results of the SEA have been taken into account is made available to the public.
- 1.3.4. SEA extends the evaluation to the broader policy and strategy of regional, county and district level plans. It is a systematic process that identifies and predicts the potential significant environmental effects of plans/programmes, informing the decision making process by testing different alternatives or options against environmental objectives.
- 1.3.5. This Environmental Report sets out the results of the SEA and development of the Lincolnshire JMWMS. In undertaking this SEA, we provide a systematic appraisal of the potential environmental impacts of the JMWMS and identify measures to prevent, reduce and where possible offset any significant adverse effects of implementing that strategy on the environment.
- 1.3.6. The structure and content of this report can be seen in Table 2 below.

Table 2 – Structure and Content of the Environmental Report

Section	Description
Introduction	A brief introduction to the JMWMS and the SEA process.
SEA Methodology	A description of the approach to the SEA, including how to assess the significant effects of a number of alternative options against key objectives to help develop the strategy.
Baseline and SEA Objectives	A summary of the plans and programmes relevant to the strategy; and an outline description of the environmental characteristics and issues of the study area. Listing of the SEA Objectives derived from baseline information, issues, and plans and programmes.
Assessment of Alternatives and Effects	The assessment of likely significant effects of the Strategy.
Mitigation and Monitoring Plan	A plan of how the impacts of this strategy will be reduced or removed and how to monitor the implementation of the plan, and the associated environmental implications.

2 SEA METHODOLOGY

2.1 INTRODUCTION

2.1.1. This section provides an overview of the SEA process, the stages undertaken to date and the current stage.

2.2 SEA PROCESS

2.2.1. SEA is an iterative process of gathering data and evidence, assessment of environmental effects, developing mitigation measures and making recommendations to refine plans or programmes in view of the predicted environmental effects. The effects predicted at this stage will be at a strategic level.

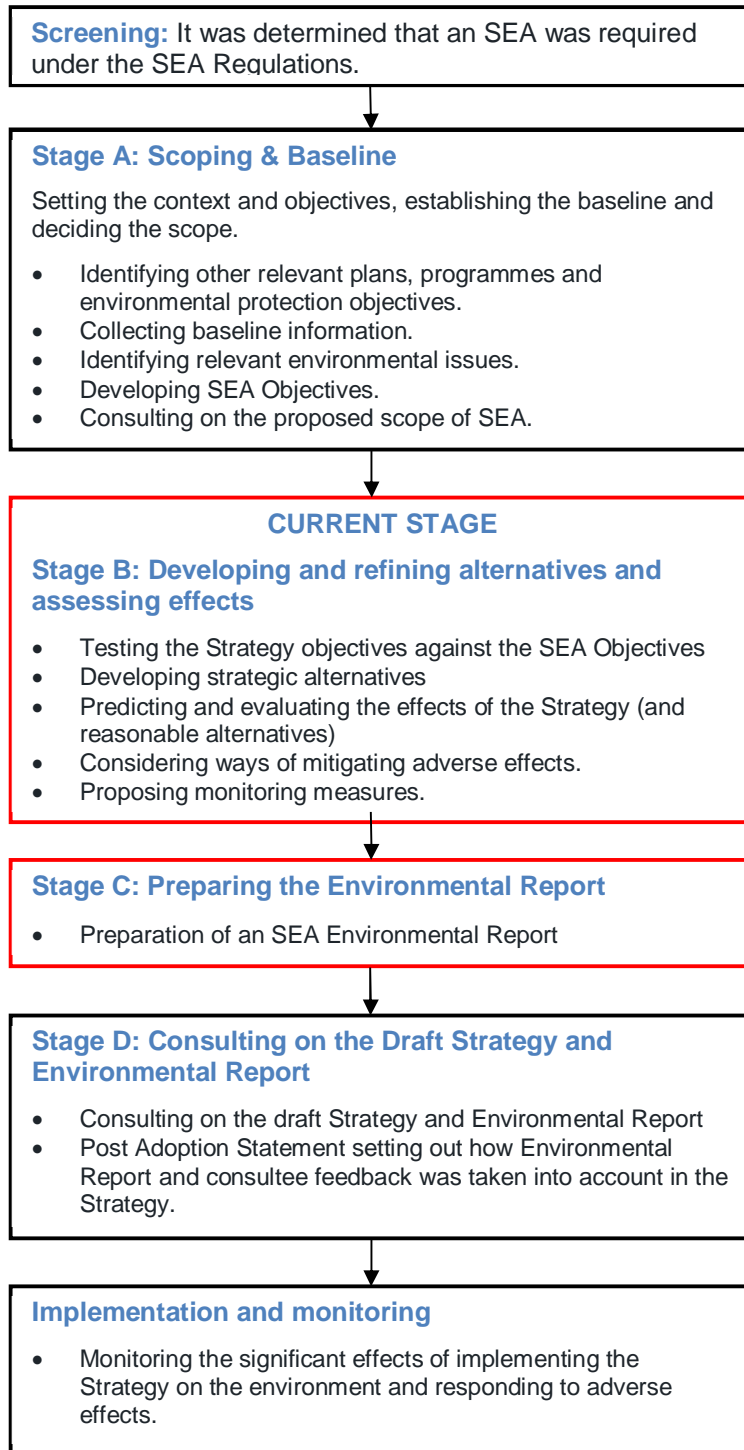
2.2.2. The approach adopted for the SEA of the JMWMS follows that set out in the Practical Guide to SEA⁷ and the Planning Practice Guidance to SEA⁸. It involves the development of an assessment framework comprising a series of SEA Objectives, assessment criteria and indicators. This framework is developed from an understanding of environmental problems and opportunities identified through a review of existing baseline information and a review of other plans, programmes and environmental protection objectives relevant to the plan area (i.e. Lincolnshire and its neighbours) and subject matter (waste management).

2.2.3. The SEA process recommended by the Practical Guide is set out in Figure 1 below. The current stage in the process is Stages B and C, which comprise developing and refining strategic alternatives, assessing environmental effects and preparation of the Environmental Report (this report).

⁷ Office of the Deputy Prime Minister (2005) A Practical Guide to the Strategic Environmental Assessment Directive [online] available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf (Accessed October 2017).

⁸ Department for Communities and Local Government (2015) Strategic Environmental Assessment and Sustainability Appraisal [online] available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

Figure 1 SEA Process and Lincolnshire JMWMS



2.3 SEA SCREENING

A 'screening' exercise was not undertaken for the JMWMS as it is mandatory requirement to conduct SEA for a waste plan under the SEA Regulations.

2.4 SEA SCOPING AND BASELINE

2.4.1. In order to determine the scope of the SEA, a number of activities have been undertaken as shown in Figure 1 above:

- Other plans and programmes were identified to establish how the Strategy interacts with wider policy framework and identify any environmental protection objectives relevant to the SEA;
- Environmental baseline data was collected and any problems identified to provide an evidence base for prediction of effects, and monitoring; and
- SEA Objectives and associated assessment criteria were developed from the information above to provide a means by which the environmental performance of the Strategy can be appraised.

2.4.2. A Scoping Report was issued for consultation in August/September 2017. Chapters 4, 5 and 6 of the Scoping Report, in addition to Appendices A and B of the report identified other relevant plans, programmes and environmental protection objectives, set out the baseline information and identify relevant environmental issues. The SEA Objectives to be used in the assessment were derived from this information. This information is summarised for ease of reference in Section 3 of this report.

2.4.3. The responses to the scoping consultation and actions taken are summarised in Appendix C of this report. Key issues are summarised below:

- The Scoping Report generally downplays the historic environment/cultural heritage. ; there are no specific schemes or development locations proposed in the JMWMS at this stage, therefore identifying scope for improvement to the historic environment and cultural heritage has been limited;
- The Scoping Report focusses on the potential impact on placement of wheelie bins in conservation areas, when there are other ways in which cultural heritage can be a receptor of harm. The baseline has been updated and assessment reflects this;
- Greater consideration needs to be given to the impact of housing growth on waste disposal capacity and infrastructure provision and on collection capacity methodologies; The baseline has updated and assessment reflects this and
- Additional policies and plans were identified, as well as additional sources or requirements for baseline information. These are now included within Appendices A and B.

2.5 DEVELOPING ALTERNATIVES AND ASSESSING EFFECTS

2.5.1. In this stage of the SEA, the JMWMS was assessed against the SEA Objectives. The assessment covered two key areas:

- The strategic alternatives considered in developing the JMWMS; and
- The proposed policies as set out in the JMWMS.

2.5.2. The SEA Objectives (and assessment criteria) are used to predict and evaluate environmental effects. Chapter 4 of this report summarises the assessment. Where significant adverse effects are predicted or there is uncertainty, measures to prevent, reduce or offset effects are identified. The significant environmental effects of the Strategy must be monitored to identify any unforeseen adverse effects and to enable appropriate remedial action. Chapter 5 of this report includes a mitigation and monitoring plan.

2.5.3. The assessment for the proposed JMWMS is presented in a table format using colour coding shown in Table 3 along with an accompanying narrative description of the assessment finding.

Table 3 – Colour coding of effect significance

Coding	Effect Significance
++	Likely significant positive effect
+	Likely positive effect
0	Negligible or no effect
-	Likely negative effect
--	Likely significant negative effect
?	The effect is uncertain
+/-	The effect is likely to be both positive and negative

2.5.4. Following the findings of the assessment, Section 5.2 of this report also includes a list of proposed mitigation and enhancement measures for any negative or positive significant effects that have been predicted.

2.6 PREPARATION OF THE ENVIRONMENTAL REPORT AND CONSULTATION

2.6.1. This Environmental Report provides the information required by the SEA Regulations and follows the stages of the SEA as described above in Section 2.2. It assesses the environmental effects of the Strategy measures and identifies measures to improve the sustainability of the Strategy as it develops.

2.6.2. Following publication, a Post Adoption Statement will be produced stating how the Environmental Report and the responses to consultation were taken into account during the preparation of the Strategy.

2.7 IMPLEMENTATION AND MONITORING

2.7.1. The Monitoring Plan set out in Chapter 5 of this Environmental Report will be used during the implementation of the Strategy to monitor both positive and negative effects.

2.8 LIMITATIONS AND ASSUMPTIONS

2.8.1. The SEA Regulations require that limitations and assumptions should be described.

2.8.2. This SEA has been based upon the information provided by LCC and the environmental information available at the time of assessment. If other strategic objectives emerge this may potentially affect the outcomes of this assessment. Therefore, it is recommended in this case that the assessment is reviewed.

2.8.3. Currently, there are no formal proposals to provide additional waste management capacity as part of the JMWMS. However, the strategy will explore whether further residual waste recovery/disposal capacity is required and, if necessary, seek to secure appropriate capacity. Therefore, due to a lack of information as to the nature, size and location of such capacity, it has been assumed that no additional capacity is being provided. If it emerges that additional capacity is required, this may affect the outcomes of the assessment and it is recommended that the assessment is reviewed. Where there is potential for impacts arising from a potential increase in capacity, this has been stated so as to inform any future updates to the JMWMS.

2.8.4. The compiled baseline data has been used to provide a ‘snapshot’ of current key issues associated with the JMWMS. Baseline data collection has been collected at a strategic level and is limited to desk-based search of publically accessible sources. There may be other potential issues that the baseline data has not captured due to the constantly changing nature of environmental data.

2.8.5. The JMWMS will apply to a 5 year plan period before a review is required to ensure that it remains current. The assessment will focus on the effects that are likely to occur during the plan period but will also seek to identify longer term effects that may occur beyond this period. It is acknowledged that longer term effects generally have a greater level of uncertainty than shorter-term, more immediate effects.

3 BASELINE AND SEA OBJECTIVES

3.1 INTRODUCTION

3.1.1. This section provides an overview of the policies, plans and environmental information used to develop the SEA Objectives and assess the potential effects of the JMWMS.

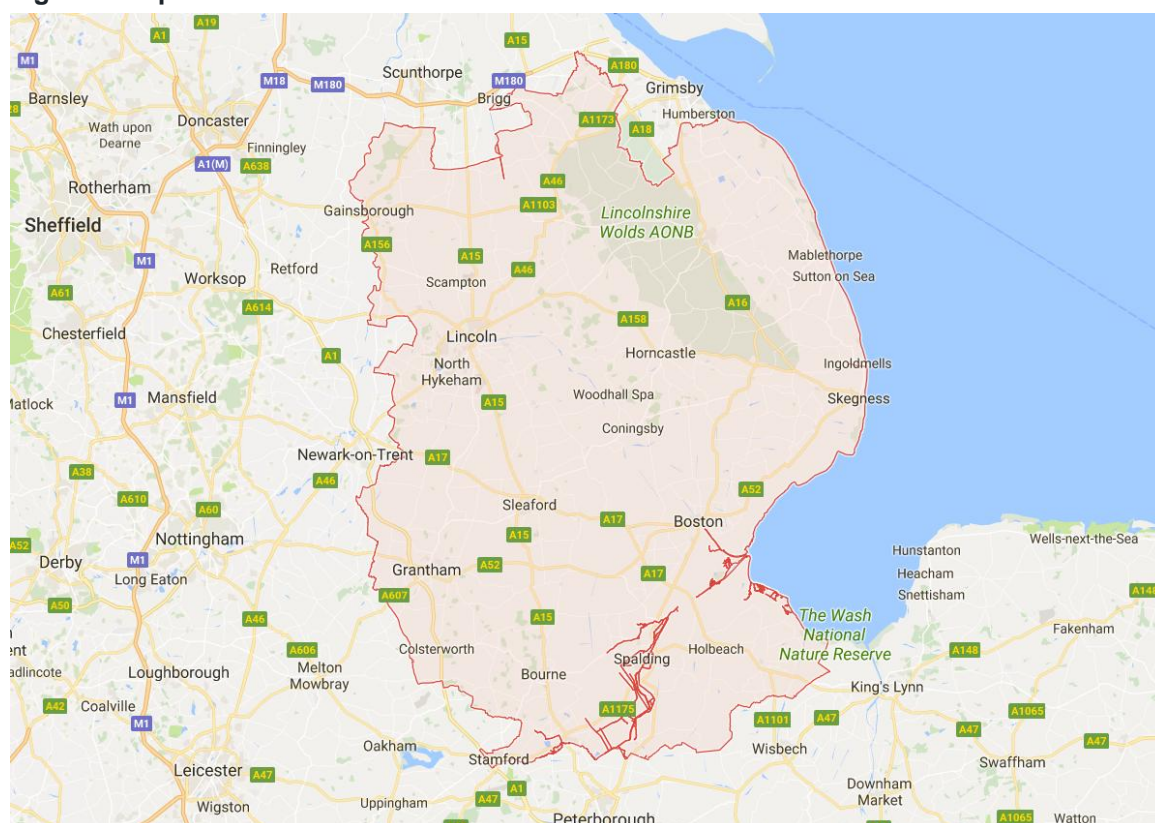
3.2 OVERVIEW OF LINCOLNSHIRE

3.2.1. The study area covers the county of Lincolnshire, incorporating the districts, borough and city councils of Boston, City of Lincoln, East Lindsey, North Kesteven, South Kesteven, South Holland and West Lindsey.

3.2.2. The county is predominantly rural and has a geographical area of 2,309 sq miles the extent of which is shown in Figure 2.⁹ The main urban area is around the City of Lincoln which is a cathedral town with a rich history dating back to Roman times. Other centres of population include Gainsborough, Louth, Mablethorpe, Skegness, Boston, Sleaford, Grantham, Stamford and Spalding.

3.2.3. Lincolnshire contains some of the country's most versatile agricultural land, a successful tourism industry and internationally important nature conservation sites.

Figure 2 Map of Lincolnshire



⁹ <https://www.google.co.uk/maps/place/Lincolnshire>

3.3 SUMMARY OF RELATED PLANS AND PROGRAMMES

3.3.1. The SEA Regulation requires that the Environmental Report includes information on the relationship of the plan or programme with other relevant plans and programmes (Regulation 12(3)). Those Plans and Programmes most relevant to the Strategy were identified in the SEA Scoping Report (WSP, August 2017). Appendix A to the Scoping Report identified a full list of plans and programmes; those most relevant locally to the strategy are summarised in Table 4 below. LCC will work with the organisations listed to ensure that the JMWMS is integrated with the plans and programmes identified in this table.

Table 4 – Summary of Relevant Plans and Programmes

Plan/Programme	Organisation	Description and Relationship with JMWMS
The Lincolnshire Minerals and Waste Local Plan – Core Strategy and Development Management Policies (Adopted June 2016)	Lincolnshire County Council	Provides the vision, objectives, spatial strategy and development management policies for minerals and waste development in Lincolnshire over the period to the end of 2031. Related to LWP Objective 8 of the JMWMS as to whether further residual waste recovery/disposal capacity is required.
Site Locations Document (Second and final) part of the Lincolnshire Minerals and Waste Local Plan (adopted on 15th December 2017)	Lincolnshire County Council	Provides specific proposals and policies for the provision of land for mineral and waste development. Related to LWP Objective 8 of the JMWMS as to whether further residual waste recovery/disposal capacity is required.
Boston Borough Council Environmental Policy (March 2010)	Boston Borough Council	Aims to improve the environmental quality of the borough by adhering to certain commitments such as promoting sound waste management practices by minimising its own waste production. Related to LWP Objective 4 and 5 of the JMWMS as to contribute to reducing waste through exploring new opportunities to use waste as a resource and increasing recycling to reduce waste and help in meet targets.
Boston Borough Council Carbon Management Plan (Update 2014-2016)	Boston Borough Council	Provides a framework to help reduce the council's carbon footprint and generate financial savings. Related to LWP Objectives 1 and 7 of the JMWMS to improve the commercial value of LCCs recycling stream and seeking to reduce LCCs carbon footprint.
City of Lincoln: A Climate Change Strategy (2005)	City of Lincoln Council	Objectives of the Climate Change Strategy include assessing Lincoln's impact on climate change and addressing how it can make changes to reduce authority's impact on climate change. Related to LWP Objective 7 of the JMWMS to seek to reduce LCCs carbon footprint.
Low Carbon Lincoln Plan 2012 – 2020 (Draft)	City of Lincoln Council	Preparing a Low Carbon Lincoln plan to reduce Lincoln's carbon footprint and prepare for the impacts of climate change.

Plan/Programme	Organisation	Description and Relationship with JMWMS
		Related to LWP Objective 7 of the JMWMS to seek to reduce LCCs carbon footprint.
Low Carbon North Kesteven Plan 2013-2020	North Kesteven District Council	Aims to reduce the levels of carbon emissions in the North Kesteven District and prepare for the impacts of climate change. Related to LWP Objective 7 of the JMWMS to seek to reduce LCCs carbon footprint.
Central Lincolnshire Local Plan (April, 2017)	City of Lincoln Council, North Kesteven District Council and West Lindsey District Council	Comprises the combined areas of the City of Lincoln, North Kesteven and West Lindsey. Related to LWP Objective 2, 4 and 5 of the JMWMS as it aims to minimise the amount of waste generated across all sectors and increase the re-use, recycling and recovery rates of waste materials.

3.4 SUMMARY OF BASELINE CHARACTERISTICS AND ISSUES

- 3.4.1. The SEA Regulations require that the Environmental Report covers:
- Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;
 - The environmental characteristics of areas likely to be significantly affected; and
 - Any existing environmental problems which are relevant to the plan or programme including European sites for nature conservation.
- 3.4.2. The Scoping Report (WSP, August 2017) identified a number of environmental aspects which are particularly relevant to the Lincolnshire JMWMS and these are listed in Table 5 below. Appendix A provides further information from the Scoping Report.

Table 5 – Summary of Environmental Characteristics and Issues

Topic	Summary of Current and Future environment
Climatic factors	<p>Future climate change will potentially affect many aspects of UK weather and is predicted to result in more extreme weather events, increased temperatures and rises in the sea level which will be accompanied by economic, social and environmental impacts. The precise nature of these changes is uncertain, particularly for those extreme events, whether of short or long-duration.</p> <p>The increased coastal erosion and flooding that is likely to be associated with climate change has the potential to decrease the quality and availability of agricultural land in the region, with the potential for impacts to the economy and food supply. It is likely that some crops could no longer be grown in the area. There may be more opportunities for vineyards and for growing lavender, sweetcorn, grain maize, sunflowers and navy beans. Additionally there may be an increased potential for planting crops for energy production. These changes in crops however will also have implications for biodiversity. Additionally, climate change is likely to result in an increased threat of pests and new crop pests such as the Colorado Beetle and the European Corn Borer.</p> <p>The East Midlands and Lincolnshire area contains a number of important national transport links and ports which could be affected by climate change. Built structures</p>

Topic	Summary of Current and Future environment
	<p>such as bridges, promenades, pylons, roads and railway lines will become more vulnerable to higher winds, flooding, storm events and changes in soil moisture. Some roads, particularly those near to the coastline and rivers will be particularly susceptible to an increased risk of flooding. Consideration will need to be given to the need to develop the capability of the carriageway to cope with excess water given the likely increase in the frequency of intense rainfall events. Railways will also be susceptible to flooding. Temperature changes also have the potential to affect roads, by causing more frequent melting of the asphalt road surface, and railways by increasing the risk of buckling on the rail tracks. Additionally, climate change has the potential to affect emergency services as a result of extreme weather events.</p>
Air quality	<p>Although air quality across the county is generally considered to be good there are 10 AQMAs in Lincolnshire, declared primarily as a result of pollution caused by traffic emissions. Lincoln City Council has 2 AQMAs, Boston Borough Council has 2 AQMAs and South Kesteven District Council has 6 AQMAs.</p>
Noise	<p>The main sources of noise in Lincolnshire are derived from transport sources, such as roads and rail. Noise action plans provide a framework to manage environmental noise and its effects. There are 94 identified NIAs in Lincolnshire, with South Kesteven district having the largest number of NIAs identified.</p>
Biodiversity, flora and fauna	<p>There are diverse wildlife and habitats in Lincolnshire that are highly valued locally, nationally and internationally. There is wealth of international, national and local designations for nature conservation within Lincolnshire. These include Ramsar sites, SACs, SPAs, AONBs, MCZs, SSSIs, NNRs and LNRs. The designations highlighted could be adversely affected from pollution, waste production, land take and climate change.</p>
Geology and soils	<p>Lincolnshire's bedrocks form a simple pattern of north-south stripes at the surface. There are older Triassic rocks in the west, overlain progressively by marine Jurassic rocks and the younger Cretaceous rocks in the east. At the surface they have been subjected to weathering and erosion under a range of climates including glacial and periglacial during the last 2 million years. The superficial geology of the county is blanketed with a covering of Quaternary superficial deposits that formed within the last two million years. The Quaternary deposits includes glacial and fluvioglacial deposits along with younger Flandrian silts, peat, sands and alluvium that cover the Fenlands, the coastal plains east of the Wolds, much of the Humber coast and the Isle of Axholme.</p> <p>Lincolnshire contains a wide variety of soils including alluvium (clay, silt and sand) along coastal regions, Till (Diamicton), River Terrace deposits (Sand and Gravel), blown sand, peat, glacial sand and gravel. Lincolnshire soils vary in thickness from a few centimetres to over a metre in response to the underlying geology, location in the landscape and agricultural practices. The thinnest soils tend to occur over chalk and limestone escarpments and on valley side, with the deepest soils in the Fenlands. These soils support the important agricultural sector in Lincolnshire.</p>
Water	<p>There are two main rivers that run through Lincolnshire. The River Witham flows through the Lincolnshire countryside, with marshy fenlands stretching out on either side. The River Witham flows from Lincoln moving east towards Bardney (west Lindsey) then south passing through Kirkstead (East Lindsey), Dogdyke (North Kesteven) and then flows into the sea at Boston. The majority of the areas in the vicinity of this river are at a high risk of flooding. The River Trent is the third longest river in the United Kingdom and a part of it forms the district boundary between Bassetlaw and West Lindsey. It runs north and then joins the River Ouse at Trent Falls to form the Humber Estuary. A majority of the areas in the vicinity of this river are at a medium risk of flooding.</p>

Topic	Summary of Current and Future environment
	<p>The water quality of the rivers that flow within Lincolnshire is poor in comparison to other regions. This is attributed to the slow moving flows of the rivers in the Anglian region which restrict the dilution of pollutants and high nitrate loads arising from fertilizer run off and livestock slurry in agricultural areas. The public water supply within Lincolnshire from surface water sources is 21% and that from groundwater sources is 79%. Nitrate pollution is a significant concern and levels have increased in the region despite the introduction of Nitrate Sensitive Areas (NSA's) and Nitrate Advisory Areas (NAA).</p>
Population and human health	<p>The population of Lincolnshire has increased by 64,830 people in the ten year period to 2015. A breakdown of this data shows that the county continues to have an ageing population and is less diverse than other areas.</p> <p>Deprivation across Lincolnshire has worsened slightly from 2010 to 2015.</p>
Material assets	<p>There is an extensive highway network in Lincolnshire. In recent years the length of trunk roads has reduced dramatically as a result of the detrunking of several A roads. There is an increasing demand on the transport network and an increase in concern around the environmental impact of traffic.</p> <p>Waste collection and disposal results in a substantial number of lorry movements into and out of the County to waste management facilities. Regular collections are required from households and with the number of households increasing and the total amount of waste increasing; there is the potential for an impact on transport. Mineral extraction operations within the county will result in substantial lorry movements to transport materials.</p> <p>New housing and employment sites are presently being identified across the county. This has the potential to increase the amount of waste generated that would need to be disposed of appropriately. This may lead to a strain on existing waste collection measures in place currently and decrease waste disposal capacity. In this case new waste infrastructure will need to be proposed.</p> <p>Lincolnshire contains a significant amount of best and most versatile agricultural land and is a large producer of food.</p>
Cultural heritage	<p>Lincolnshire's historic landscape and built environment reflects local topography, land use and the availability of building materials, and more recently changes in social conditions and technological advances. One of the county's assets is the combination of styles and materials which represent the economic and aesthetic influences of different periods of history. This is reflected in the high historic and cultural value of the cores of Lincoln City and surrounding towns. Lincolnshire has a large amount of heritage assets including 162 Conservation Areas, 7200 Listed Buildings and 478 Scheduled Monuments across the county.</p>
Landscape	<p>The Lincolnshire Wolds Area of Outstanding Natural Beauty (AONB) is a significant feature of the Lincolnshire landscape; the AONB covers parts of East Lindsey and West Lindsey. There are 11 Landscape Character Areas (LCA) within Lincolnshire. The major urban areas within Lincolnshire are those within and around Lincoln, South Kesteven and Boston Borough. Areas closer to the coastline are recently becoming increasingly urbanised due to tourism.</p> <p>The Lincolnshire coastline has been shaped throughout history by natural processes such as changes in sea level and coastal processes are constantly shaping the coast. The effects of changes in sea level and climate change will impact greater on the coastline leading to coastal erosion.</p>

3.5 SEA OBJECTIVES

- 3.5.1. The Scoping Report also proposed a number of SEA Objectives, aligned with a series of themes. While not specifically required by the Regulations, SEA Objectives are a recognised way of considering the environmental effects of a plan or programme and comparing the effects of alternatives.
- 3.5.2. The SEA Objectives and themes for the Lincolnshire JMWMS were derived from the review of baseline information, issues, plans and policies described above. The SEA Objectives are listed in Table 6 along with potential indicators.

Table 6 – SEA Objectives

SEA OBJECTIVES	POTENTIAL INDICATORS	RESPONSIBLE AUTHORITY FOR COLLECTING INFORMATION
Climatic Factors		
1. To reduce carbon emissions from energy use.	Amount of fuel used in waste management collections per annum. Monitoring carbon emissions throughout the treatment of waste (recycling, composting, incineration, landfill)	Local Authority
2. To contribute to a circular economy through the use of waste management collection infrastructure and recycled materials.	Replacement bins that are recycled at the end of their useful life	Local Authority
Air Quality		
3. To prevent deterioration of air quality within the county and where possible make improvements.	Percentage of Euro VI engines, electric vehicles, hybrid vehicles, biogas or hydrogen fuelled vehicles operating on behalf of the local authorities in a waste management related capacity per annum Striving to meet Industrial Emissions Directive Emission Limit Values.	Local Authority
Noise		
4. To minimise the effects of noise in the identified NIAs.	Number of planning applications for new waste management infrastructure that consider the appropriateness of access through NIAs	Local Authority
Biodiversity, Flora and Fauna		
5. To maintain biodiversity in Lincolnshire.	Significant effects upon biodiversity identified during the planning consenting process for new waste management infrastructure.	Environment Agency/ Local Authority
Geology and Soils		
6. Promote the conservation and wise use of land, and protect soil quality and quantity.	Tonnes of green waste that is used as compost per annum	Local Authority
	Fly tipping incidents per annum	Environment Agency/Local Authority

	EfW facility(s) ash disposal use as a sub-base for construction material.	Local Authority
Water		
7. To protect water courses and improve the quality of water and wastewater discharges resulting from waste management activities.	Number of surface water discharge applications for new waste management infrastructure agreed by the Environment Agency.	Local Authority/ Environment Agency
Population and Human Health		
8. To encourage economic investment through waste management.	Monetary value of new waste management infrastructure developed per annum	Local Authority
9. To ensure that the growing population of Lincolnshire does not lead to an increase in the percentage of waste disposed of.	Total percentage of waste recycled and composted per annum	Environment Agency/Local Authority
	Total percentage of waste recovered per annum	Environment Agency/Local Authority
Material Assets		
10. To facilitate opportunities for recycling within residential development.	Proportion of housing scheme planning approvals where dedicated waste management storage considerations are included in the application per annum	Local Planning Authority
11. To protect agricultural resources from waste management activities	Area of agricultural land lost to new waste management infrastructure.	Local Authority
12. To encourage material re-use/waste avoidance.	Waste generated per capita per annum	Environment Agency/Local Authority
13. To ensure sustainable use of resources through effective waste management.	Amount of energy generated by the EfW (as a measure of non-combustible diversion rates) per annum	Local Authority
	Amount of heat exported from the EfW.	Local Authority
	Percentage of recyclables in residual waste per quarter (as an indicator of resources lost to less sustainable management)	Local Authority
Cultural Heritage		

14. Protect and enhance the historic environment, heritage assets and their setting (including architectural and archaeological heritage)	Number of archaeological investigations and cultural heritage setting assessments undertaken for new waste management infrastructure.	Local Authority
Landscape		
15. To protect and enhance the countryside in Lincolnshire	Area of AONB land lost to new waste management infrastructure	Local Authority

4 ASSESSMENT OF ALTERNATIVES AND EFFECTS

4.1 INTRODUCTION

4.1.1. This section presents the findings of the assessment covering two key areas:

- The strategic alternatives considered in developing the JMWMS; and
- The proposed objectives of the JMWMS.

4.1.2. Mitigation and enhancement measures for negative or positive significant effects are set out in Section 5.2.

4.2 DEVELOPING STRATEGIC OPTIONS

4.2.1. At a strategic level, two options were considered:

- Retention of the existing JMWMS; and
- Development of a new JMWMS with new objectives.

RETENTION OF THE EXISTING JMWMS

4.2.2. This option would involve retaining the current JMWMS for Lincolnshire which was published in June 2008. The current JMWMS vision is:

- To commit to sustainable development and the waste hierarchy;
- To minimise waste growth by encouraging and promoting waste prevention and reduction;
- To promote sustainable resource use through increased re-use, recycling and composting of waste;
- To maximise recovery and the use of waste as a resource;
- To reduce the amount of biodegradable waste sent to landfill each year; and
- To minimise the impacts of the final proposal.

4.2.3. Retention of the current JMWMS would reduce both cost and time of producing a new JMWMS.

DEVELOPMENT OF NEW JMWMS WITH NEW OBJECTIVES

4.2.4. This option would involve the development of a new JMWMS.

4.2.5. New objectives could seek to improve Lincolnshire's waste management services in the context of the new challenges and issues faced, taking advantage of new and emerging technologies/processes to meet the needs of the county. It could promote innovative, customer-friendly waste management solutions that give value for money. The development of a new strategy could also allow it to more specifically align with, and take account of, the differences in waste streams, opportunities and aspirations across the county.

CONCLUSION

4.2.6. The LWP considers that the retention of the existing JMWMS is unlikely to continue to reflect Lincolnshire's needs into the future since it would not take account of recent changes in national and local government budgets and policies and changes in the way waste services are delivered (such as with new technologies or processes). For example, new challenges to the management of waste in Lincolnshire include:

- Continuing to provide the best possible service at a time when local authority budgets have been greatly reduced;
- Turning around a recycling rate which has begun to fall both locally and nationally; and
- Possible changes in government policy following our departure from the European Union.

4.2.7. In environmental terms, there is likely to be little difference between the two strategic options considered. There is no evidence to indicate that the current JMWMS is having negative environmental effects. That said, the existing JMWMS is not addressing local environmental issues (which are likely to differ across the county) as fully as it could be. The development of a new JMWMS would allow more specific circumstances across different parts of the county to be considered; potentially leading to better environmental outcomes compared to if the existing JMWMS was retained.

4.2.8. Similarly, the existing JMWMS, which has been in place since 2008, may not sufficiently take into account new waste management technologies. Again, the development of a new JMWMS would allow stronger provision for the uptake of new waste management technologies/processes to be made which, in general terms, could lead to an environmental benefit.

4.3 ASSESSMENT OF JMWMS OBJECTIVES

4.3.1. The assessment of JMWMS objectives against the SEA Objectives is presented in Table 7.

Table 7 – Assessment of JMWMS

SEA Theme		Climatic Factors		Air Quality	Noise	Biodiversity, Flora and Fauna	Geology and Soils	Water	Population and Human Health		Material Assets			Cultural Heritage	Landscape	
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
SEA Objective		Proposed JMWMS Objective														
Objective 1: Recycling Stream	To improve the quality and therefore commercial value of our recycling stream.	+	+	+	+/-	0	0	0	+	+	+	0	+	+	+	0
		<p>This objective focuses on minimising waste management costs and increasing efficiency throughout the recycling process.</p> <p>2. An improvement in the quality and therefore commercial value of LCC’s recycling stream could potentially contribute to a circular economy; improved waste management collection infrastructure would enhance the quality, variety and subsequently the marketability of waste streams. This would facilitate the use of these waste streams as resources in themselves, and the extraction of further value from them; behaviours which drive the circular economy.</p> <p>1, 3, 14. There is potential for a reduction in carbon emissions if the quality and commercial value of the recycling stream is improved through an increase in recycling rates and a decrease in disposal. This may have a positive effect on air quality through the reduction of waste vehicles required for transporting non-recyclable waste, or the amount of material sent for landfill/incineration; operations which have a negative effect on air quality. The reduction in waste collection vehicles required could also benefit cultural heritage, for example by reducing the frequency of waste collection operations in conservation areas.</p> <p>4. By increasing the efficiency in the waste collection stream, there could be a reduction in the amount of waste collections required, which could potentially lead to a reduction in noise levels in NIAs arising from waste collection and reduce noise generated at material recovery facilities. This would have a positive effect on noise levels. However, there is a possibility that the introduction of new technology or processes to improve the quality of the recycling stream could generate noise. The difference would be that the noise generated in this latter scenario would be site focussed (e.g. at</p>														

		<p>the recycling processing facility), rather than route focussed; there could therefore be more opportunities to manage noise emissions in this scenario (i.e. site specific mitigation measures).</p> <p>8. A focus on improving the recycling stream and engaging with the commercial waste sector could generate investment opportunities in waste management by realising a greater revenue stream from the material collected. Focusing on streams with the most economic and/or environmental value and investment opportunities arising from waste streams as marketable products could drive economic and employment growth. Economic benefits could also arise from cost savings achieved from an increase in efficiency and efficacy of recycling.</p> <p>9, 10, 12, 13. By striving to enhance the quality and commercial value of waste streams, there would be a knock-on effect at 'waste source', for example, domestic waste, as a key part in the 'supply chain' for these waste streams. Adopting and promoting circular economy thinking and the potential for realising value from higher quality waste streams would encourage the promotion of recycling and waste reduction behaviours amongst residents. This would incentivise ways to make recycling easier for residents such as the introduction of recycling facilities within residential developments, additional support in the re-use of materials and the avoidance of waste. A growth in population and housing could thereby be seen as an opportunity to increase the amount of marketable, revenue generating material coming out of waste management activities. A quality, reliable source of recyclable material would drive its consumption as a resource in itself. There would therefore be a positive effect on these objectives. It should be noted that there could be a conflict between objectives 12 and 13, because a drive to avoid the creation of waste in the first place would eventually deprive consumers of waste streams (e.g. EfW facilities) of their source material.</p> <p>5, 6, 7, 15. It is considered that the development of waste management infrastructure for new waste streams would be the most likely aspect of waste management strategy to affect these themes. However, currently there are no proposals for the development of new waste management sites; therefore no effect on these themes is predicted.</p>															
<p>Objective 2: Recycling Materials</p>	<p>To consider moving towards a common set of recycling materials.</p>	<table border="1" style="width: 100%; text-align: center;"> <tr> <td style="background-color: #90EE90;">+</td> <td style="background-color: #90EE90;">+</td> <td style="background-color: #90EE90;">+</td> <td style="background-color: #90EE90;">+</td> <td>0</td> <td>0</td> <td>0</td> <td style="background-color: #90EE90;">+</td> <td style="background-color: #90EE90;">+</td> <td style="background-color: #90EE90;">+</td> <td>0</td> <td style="background-color: #90EE90;">+</td> <td style="background-color: #008000;">++</td> <td>0</td> <td>0</td> </tr> </table> <p>This objective aims to have a common set of recycling materials across the county; if every Local Authority is using the same bins and waste streams, it is easier to integrate waste operations, collections and sites. This would also strengthen relationships within the LWP and promote high quality recycling.</p> <p>2. Moving towards a common set of recycling materials across the county will enable a greater collaboration on how to extract the most value from these materials as part of on-going re-use. This will further the contribution of the JMWMS to the circular economy.</p> <p>8, 10. In order to move towards a common set of recycling materials this would require some investment initially as certain Local Authorities would need to provide a revised set of bins, educate people on what materials the new bins are</p>	+	+	+	+	0	0	0	+	+	+	0	+	++	0	0
+	+	+	+	0	0	0	+	+	+	0	+	++	0	0			

		<p>for, adapt/change their waste collection vehicles/collection routes and/or waste treatment sites, and re-train collection operatives. This process would provide an opportunity to reevaluate wider provision of recycling facilities, such as the potential to facilitate opportunities for recycling within residential developments and contribute towards increasing recycling rates. Where collection vehicles are replaced, consideration to the procurement of low or zero emission vehicles should be considered.</p> <p>5, 6, 7, 11, 14, 15. It is considered that the development of new waste management infrastructure would be the most likely aspect of waste management strategy to affect these themes. However, currently there are no proposals for the development of new waste management sites; therefore no effect on these themes is predicted.</p> <p>9, 12. Having a common set of recycling materials provides an opportunity to update and educate households across the county on recycling and waste avoidance. Collaboration with local schools, youth groups, businesses and companies as part of this may encourage culture change in current and future generations with regards to recycling and waste avoidance. Combining resources across the county would provide greater opportunities for efficiencies in terms of waste collection and treatment and would enhance the capability of each LA to encourage material re-use and waste avoidance behaviours amongst the growing population.</p> <p>13. Focusing on streams with the most economic and/or environmental value and deciding on a common set of recycling materials would have a positive effect in the sustainable use of resources by creating greater efficiencies across the county in waste stream collection and management. For example, waste collection routes and waste management sites could be planned and used more strategically across the county, responding to potential avenues of re-use more holistically than is currently the case. A certain amount of investment would be required to achieve this, depending on the existing waste management arrangements in each LA, but the potential for increased efficiency and resilience in both the waste management capability of the county and the resulting waste stream supply chain is worth noting.</p> <p>1, 3, 4. A more strategic county wide approach to waste collection would contribute to more efficient use of vehicles, and lead to a reduction in vehicle emissions, both air quality and noise associated with waste collection vehicle movements.</p>															
<p>Objective 3: Food Waste Collections</p>	<p>To consider the introduction of separate food waste collections.</p>	<table border="1" data-bbox="584 1137 2009 1187"> <tr> <td>+/-</td> <td>+</td> <td>-</td> <td>-</td> <td>?</td> <td>0</td> <td>0</td> <td>+</td> <td>0</td> <td>?</td> <td>0</td> <td>0</td> <td>+</td> <td>?</td> <td>?</td> </tr> </table> <p>This objective aims to introduce the separate collection of food waste.</p> <p>1, 3, 4. Where existing vehicles, collection routes and processing facilities could not be adapted to incorporate the collection of this new waste stream, additional collection vehicles and routes would probably be required to achieve this objective. The introduction of separate food waste collections could therefore increase the amount of vehicle</p>	+/-	+	-	-	?	0	0	+	0	?	0	0	+	?	?
+/-	+	-	-	?	0	0	+	0	?	0	0	+	?	?			

		<p>movements related to waste collection and the distance they have to travel to reach a facility capable of processing the new waste stream, thus having a negative effect on climatic factors and a likely negative effect on air quality and noise. Where collection vehicles are replaced, consideration to the procurement of low or zero emission vehicles should be considered. However, by collecting food waste, there would be an associated decrease in the volume and frequency of other types of waste collections.</p> <p>2, 13. The separate collection of food waste could contribute to the circular economy by enabling the recovery and use of an additional waste resource as a product, thereby realising value from this aspect of the waste stream. It would therefore also encourage greater sustainability in use of resources. For example, the potential for the re-use of food (and other green) waste as a bio-fertiliser could have particular benefits in a county such as Lincolnshire, in which agriculture is a key part of the economy.</p> <p>8, 9, 10, 12. Investment and engagement with commercial sector would be required to facilitate the separate collection of food waste, but as the value from the waste stream is realised, this would generate further economic benefits. Similar to Objective 2 above, Local Authorities may need to distribute new bins, educate residents on what the new collections are for, adapt their existing vehicles/collection routes and waste treatment sites to accommodate the new waste stream, and re-train operatives. Where collection vehicles are replaced, the procurement of low or zero emission vehicles should be considered. As part of the implementation of this objective, there is an opportunity to increase support for recycling within residential developments, as well as educating households on waste avoidance and recycling, with a view to enhancing these behaviours, thereby offsetting the potential for an increasing population to generate waste. Collaboration with local schools, youth groups, businesses and companies as part of this may encourage culture change in current and future generations with regards to recycling and waste avoidance.</p> <p>14, 15. There is a possibility that the changes in the frequency of waste collections, and an increase in the number of bins per household, may have a visual impact on landscape/heritage areas.</p> <p>5, 6, 7, 11. It is considered that the development of waste management infrastructure for new waste streams would help fill in any processing gaps and be the most likely aspect of waste management strategy to affect these themes. However, currently there are no proposals for the development of new waste management sites; therefore no effect on these themes is predicted.</p>															
<p>Objective 4: Waste as a resource</p>	<p>To explore new opportunities of using all waste as a</p>	<table border="1"> <tr> <td style="background-color: #90EE90;">+</td> <td style="background-color: #3CB371;">++</td> <td style="background-color: #90EE90;">+</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td style="background-color: #90EE90;">+</td> <td style="background-color: #90EE90;">+</td> <td style="background-color: #90EE90;">+</td> <td>0</td> <td style="background-color: #3CB371;">++</td> <td style="background-color: #90EE90;">+</td> <td>0</td> <td>0</td> </tr> </table> <p>This objective aims to achieve sustainable waste management by following the waste hierarchy: Prevention, preparing for re-use, recycling, other recovery and disposal. This objective links to Objective 3: introduction of separate food waste collection</p>	+	++	+	0	0	0	0	+	+	+	0	++	+	0	0
+	++	+	0	0	0	0	+	+	+	0	++	+	0	0			

	<p>resource in accordance with the waste hierarchy.</p>	<p>1, 2, 3. This objective will contribute to an increase in the amount of residual waste that is recycled or composted, and therefore diverted from landfill. Consideration will need to be given to sending the collated waste and recycled materials to nearby locations within each district, borough and city councils to ensure that the environmental effects of transporting do not outweigh the benefits of reducing residual waste. The objective also contributes directly to the theme on circular economy, by seeking to identify uses for and maximising value from waste materials.</p> <p>8. Using waste as a resource will generate investment, as long as there is a commercial benefit to be gained from the products arising. Careful consideration would need to be given to how this objective is realised, as it is considered that the development of waste management infrastructure for new waste streams could have a number of associated environmental effects depending on the nature and location of such development. However, currently there are no proposals for the development of new waste management sites.</p> <p>9, 10, 12, 13. The objective focuses strongly on the reuse of materials and avoidance of waste where possible. There is therefore a great deal of opportunity to positively affect these themes through education/communication on recycling and waste avoidance behaviours and provision of support/facilities for households. Collaboration with local schools, youth groups, businesses and companies as part of this may encourage culture change in current and future generations with regards to recycling and waste avoidance. The objective links well to those aspiring to increase the efficiency and efficacy of recycling across the county. Achieving this objective would also help to offset a growth in waste arising from an increasing population in the county.</p> <p>4, 5, 6, 7, 11, 14, 15. It is considered that the development of waste management infrastructure for new waste streams would be the most likely aspect of waste management strategy to affect these themes. However, currently there are no proposals for the development of new waste management sites; therefore no effect on these themes is predicted.</p>														
<p>Objective 5: Recycling Target</p>	<p>To contribute to the UK recycling target of 50% by 2020.</p>	+	++	+	0	0	0	0	+	+	+	0	+	+	0	0
		<p>This objective aims to increase the percentage of waste recycled and improve the environmental impact of existing services in order to contribute to the UK recycling targets set for 2020.</p>														

		<p>1, 2, 3. An increase in the percentage of recycled materials would lead to a corresponding decrease in the percentage of non-recyclable waste. The relative differences in required collections, vehicles and disposal are likely to lead to a positive effect on carbon emissions and air quality. This objective would also contribute to the circular economy by increasing the potential for additional value to be realised from recyclables.</p> <p>8. An increase in yield of recycled materials could generate revenue and investment from potential consumers of this material. The marketability of the waste stream would depend on their being an adequate, predictable supply.</p> <p>9, 10, 12, 13. The growing population of Lincolnshire may lead to an increase in the amount of household waste generated. This objective could help to offset this impact, by increasing the percentage of this waste that is recyclable. It provides an opportunity to promote recycling and waste avoidance to residents, as well as exploring how to enhance the performance of residential developments in terms of recycling. The objective will also drive a greater efficacy in waste management as the implementation of the strategy aligns with the national recycling target.</p> <p>4, 5, 6, 7, 11, 14, 15. It is considered that the development of waste management infrastructure for new waste streams would be the most likely aspect of the waste management strategy to affect these themes. However, currently there are no proposals for the development of new waste management sites; therefore no effect on these themes is predicted.</p>																													
<p>Objective 6: Environmental Performance</p>	<p>To find the most appropriate ways to measure our environmental performance and set appropriate targets.</p>	<table border="1" style="width: 100%; text-align: center;"> <tr> <td style="background-color: #90EE90;">+</td><td style="background-color: #90EE90;">+</td><td style="background-color: #90EE90;">+</td><td style="background-color: #90EE90;">+</td><td style="background-color: #90EE90;">+</td><td style="background-color: #90EE90;">+</td><td style="background-color: #90EE90;">+</td><td style="background-color: #90EE90;">+</td><td style="background-color: #90EE90;">+</td><td style="background-color: #90EE90;">+</td><td style="background-color: #90EE90;">+</td><td style="background-color: #90EE90;">+</td><td style="background-color: #90EE90;">+</td><td style="background-color: #90EE90;">+</td><td style="background-color: #90EE90;">+</td><td style="background-color: #90EE90;">+</td> </tr> </table> <p>This objective aims to improve how the environmental performance of the waste management strategy is measured.</p> <p>The measurement of environmental performance, with a view to setting and tracking progress against appropriate targets, will facilitate the identification of areas for improvement, proposal of actions to drive positive changes, and provide evidence against which performance can be tracked. This will have a positive effect on all the themes, and will also tie into the objectives of this SEA, which should be used as a starting point in the development of these measurements/targets.</p> <p>Fulfilling this objective should ensure that the aspects measured link back to tangible environmental and waste management benefits to ensure that progress is not made for progress's sake. This may require a more strategic and holistic approach to target setting, monitoring and review than is standard practice. A feedback action should be included to make sure that the findings in relation to environmental performance have the opportunity to enable further changes to targets so support continual improvement. Working with and learning from authorities outside the LWP on measuring environmental performance and setting targets can also help achieve this objective.</p>														+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+																
		<table border="1" style="width: 100%; text-align: center;"> <tr> <td style="background-color: #90EE90;">++</td><td style="background-color: #90EE90;">+</td><td style="background-color: #90EE90;">+</td><td style="background-color: #90EE90;">+</td><td style="background-color: #90EE90;">0</td><td style="background-color: #90EE90;">0</td><td style="background-color: #90EE90;">0</td><td style="background-color: #90EE90;">+</td><td style="background-color: #90EE90;">+</td><td style="background-color: #90EE90;">+</td><td style="background-color: #90EE90;">0</td><td style="background-color: #90EE90;">+</td><td style="background-color: #90EE90;">+</td><td style="background-color: #90EE90;">+</td><td style="background-color: #90EE90;">+</td> </tr> </table>														++	+	+	+	0	0	0	+	+	+	0	+	+	+	+	
++	+	+	+	0	0	0	+	+	+	0	+	+	+	+																	

<p>Objective 7: Carbon Footprint</p>	<p>To seek to reduce our carbon footprint.</p>	<p>This objective aims to reduce LCC’s carbon footprint.</p> <p>1, 2, 3, 4, 14, 15. Achieving this objective would contribute directly to these themes. It is expected that this objective will be achieved in relation to the number and frequency of waste management collections made. This can be done by reducing waste collection frequency, miles driven and/or using cleaner fuels in waste collection vehicles or new electric/hybrid vehicles. These actions would lead to improvements in air quality and noise emissions associated with waste vehicle collection, as well as the potential for minor improvements in historic and landscape value. There is also the opportunity to explore the reduction of energy used at existing waste management facilities as part of this objective.</p> <p>8, 9, 10, 12, 13. The ways in which this objective could be achieved links well with other objectives around waste avoidance and increased re-use of existing waste streams. There is therefore the opportunity for this objective to have a positive effect on these themes as a result of reduction in waste and realisation of higher quantity and better quality waste streams.</p> <p>5, 6, 7, 8, 11. It is considered that the development of waste management infrastructure for new waste streams would be the most likely aspect of waste management strategy to affect these themes. However, this objective does not necessarily require the development of new waste management sites; it is more closely linked to management of existing infrastructure and processes. Therefore there will be no effect on these themes.</p>															
<p>Objective 8: Residual Waste</p>	<p>To make an objective assessment of whether further residual waste recovery/disposal capacity is required and, if necessary, seek to secure appropriate capacity.</p>	<table border="1" data-bbox="582 833 2016 877"> <tr> <td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>-</td><td>+/-</td><td>+</td><td>-</td><td>0</td><td>-</td><td>0</td><td>0</td><td>-</td><td>-</td> </tr> </table> <p>The aim of this objective is to determine if there is a need for new waste infrastructure and what this potential infrastructure would consist of.</p> <p>1, 2, 3, 4. An alternative to a potential new facility/waste infrastructure would be to transport waste out of the county to an existing, but more distant, facility. This would contribute to increased carbon, air quality and noise emissions through highway movements in the transport of waste. However, the construction and operation of a new waste recovery/disposal facility could also lead to an increase in these emissions. This objective therefore has a negative effect on these themes.</p> <p>5, 6, 7, 11, 14, 15. The nature and location of potential new capacity would have the potential to negatively impact these themes as a result of land take, construction and operational emissions, and the addition of infrastructure into the natural, potentially rural/historic environment. Whilst existing legislation protects the water environment to a certain extent, any future development would need to take account of flood risk, both to the development and to other areas as a result of the development. Depending on the extent to which the development incorporated sustainable drainage, it could have positive or negative impacts on drainage and flood risk. It would also need to be resilient in the face of</p>	-	-	-	-	-	-	+/-	+	-	0	-	0	0	-	-
-	-	-	-	-	-	+/-	+	-	0	-	0	0	-	-			

		<p>climate change and the changes this will bring to the natural environment and conditions in which the development would operate.</p> <p>8. This objective would have a positive impact on this theme through the provision of new waste management infrastructure, which would generate investment and employment. The potential for the incorporation of innovative and bold approaches to waste management could also bring benefits. Working with and learning from authorities outside the LWP and engaging with the commercial waste sector could help in forming a solution to processing capacity gaps.</p> <p>9. Additional waste management infrastructure would be able to accommodate the demands of an increasing population, but unless the development contributed to other objectives in relation to waste avoidance or better recycling, then it would not prevent an increase in waste requiring disposal. It is therefore possible that this objective, on balance, would have no impact on this theme.</p>															
Objective 9: LWP Governance Model	To regularly review the LWP governance model in order to provide the best opportunity to bring closer integration and the implementation of the objectives set by the strategy.	0	0	0	0	0	0	0	+	0	+	0	+	+	0	0	<p>This objective aims to encourage and drive efficiency and action within and between the Local Authority areas.</p> <p>10, 12, 13. The use of positive engagement between the LWP and with the local community can encourage behavioural change and promote recycling initiatives, whilst also identifying and exploiting opportunities for innovative approaches towards instigating change.</p> <p>8. The efficiency drive can lead to cost savings if this is implemented correctly through effective communication with the Lincolnshire public and stakeholders.</p> <p>The collaboration between local authorities making up the partnership and working alongside and learning from authorities outside the LWP can help contribute to achieving the objectives set by this strategy. Regular reviews will enable the LWP governance model to be responsive to change, opportunities and challenges in relation to implementation of the strategy. This could provide avenues for economic investment and allow greater flexibility to respond to innovations around sustainable use of resources, waste re-use and waste avoidance.</p>
Objective 10: Innovative Solutions	To consider appropriate innovative solutions in the delivery	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	<p>This objective aims to encourage the use of innovations to deliver a sustainable waste management service.</p>

	<p>of our waste management services.</p>	<p>There are a number of avenues through which the objective could be fulfilled; for example, use of innovative, or emerging waste management or vehicle technology, education/communication strategies to influence or support changes in householder behaviour, adopting and promoting circular economy thinking, development and/or marketing of products from waste streams, or collaborations with waste producers/users and working with and learning from authorities outside the LWP. The implementation of these innovations could take place at a local authority or a county level, and could have varying influences over each of the themes. The consideration of innovative solutions would need to ensure value for money is achieved. The effect on all SEA themes is therefore considered to be uncertain, because of the lack of information on the potential solutions at this stage.</p>
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SUMMARY OF ASSESSMENT OF JMWMS OBJECTIVES

4.3.2. The assessment has determined that there is the following potential for environmental effects:

- The introduction of a common set of recycling materials is likely to have a significant positive effect in relation to the sustainable use of resource through effective waste management;
- Exploring the use of waste as a resource via the waste hierarchy is likely to have a significant positive effect in relation to the circular economy and the sustainable use of resource through effective waste management;
- Contributing to the UK's recycling target is likely to have a significant positive effect in relation to the circular economy;
- Seeking to reduce carbon emissions from energy use is likely to have a significant positive effect in relation to carbon emissions.

There are also some unknown effects relating to:

- The effect of separate food waste collections on biodiversity, opportunities for recycling within residential developments, the historic environment and the Lincolnshire countryside; and
- Innovative solutions in the delivery of waste management services.

4.4 ASSESSMENT OF CUMULATIVE EFFECTS

4.4.1. The SEA Directive requires that cumulative effects are considered when identifying likely significant effects. These effects arise, for instance, where several developments each have insignificant effects but together have a significant effect; or where several individual effects of the plan (e.g. noise, dust and visual) have a combined effect on an environmental receptor.

4.4.2. The approach taken has been to identify all cumulative effects in terms of:

- Their spatial extent; and
- Their temporal extent;

4.4.3. The tables above have considered how the different elements of the plan combine to affect the various environmental, social and economic elements identified in the SEA Objectives. However, it is also important to consider the effects of plan implementation combined with plans or schemes within and around Lincolnshire. The first section below assesses the potential cumulative effects of the JMWMS with other local plans. Then, the second section below describes potential for cumulative effects resulting from the JMWMS combined with other potential schemes being considered in and around the county.

4.4.4. The tables above have considered how the different elements of the plan combine to affect the various environmental, social and economic elements identified in the SEA Objectives. However, it is also important to consider the effects of plan implementation combined with plans or schemes within and around Lincolnshire. The first section below assesses the potential cumulative effects of the JMWMS with other local plans. Then, the second section below describes potential for cumulative effects resulting from the JMWMS combined with other potential schemes being considered in and around the county.

CUMULATIVE EFFECTS WITH OTHER PLANS

4.4.5. LCC has five neighbouring authorities that have produced waste management development plans and strategies. These documents have been reviewed at a high level to identify the areas where cumulative effects may rise.

The five local authorities that border Lincolnshire comprise of North Lincolnshire, Nottinghamshire, Leicestershire, Peterborough and Norfolk. Each of these local authorities have a waste management development plan or strategy in place. These are considered in Table 8 below and address the potential for cumulative impacts at a strategic, rather than a site specific level.

Table 8 – Assessment of potential cumulative effects with other Plans

Plan	Potential Cumulative Effects	Mitigation/Enhancement Measures
North Lincolnshire Council- Municipal Waste Management Strategy	<p><i>This is the waste strategy for North Lincolnshire Council from 2012-2030. Currently, the household waste produced in North Lincolnshire that is not recycled or composted is buried in the ground in a landfill site.</i></p> <p>The two strategies should be able to work together to reduce the amount of waste sent to landfill. This would manage the amount of future capacity required for waste disposal, taking into account population growth and greater efficiency of waste management.</p>	<p>None proposed.</p>
Nottinghamshire County Council Waste Core Strategy (adopted 2013)	<p><i>This core strategy is part 1 of the Nottinghamshire’s Waste Local Plan and sets out the overall approach to future waste management in Nottinghamshire and Nottingham including estimates of how much waste capacity needs to be provided up to 2031 , what types of sites are suitable and where in broad terms new or extended waste management sites should be located. Part 2 of the Waste Local Plan will consist of the Waste Sites and Policies document and is currently being put together by Nottinghamshire County Council and Nottingham City Council.</i></p> <p>As both strategies suggest the potential for additional waste management capacity, there is the potential for cumulative effects arising from landtake and development of these sites at a regional/national scale. As neighbouring administrative areas, there is potential for a strategic approach to waste management between the two; for example using or managing each other’s waste streams/products as the need arises e.g. composted material, fuel for EfW.</p>	<p>Consult with neighbouring administrative areas as to the opportunities for the use and/or management of various waste streams.</p>
Leicestershire & Leicester WASTE Development Framework (adopted October 2009)	<p><i>Core Strategy & Development Control Policies up to 2021. The Core Strategy includes a spatial vision, spatial strategy, strategic objectives and core policies which set out the key principles to guide the form of waste management development in the WDF area.</i></p> <p>As both strategies suggest the potential for additional waste management capacity, there is the potential for cumulative effects arising from landtake and development of these sites.</p>	<p>None proposed.</p>

Cambridgeshire and Peterborough Minerals and Waste Development Plan (adopted July 2011)	<p><i>The development plan highlights Cambridgeshire and Peterborough, through the sustainable community's agenda and regional spatial strategy, will be subject to a significant level of growth over the period to 2026. Will need to ensure: that the waste generated in the plan area, including the new developments, is managed in a sustainable way through a network of waste management facilities</i></p> <p>As both strategies suggest the potential for additional waste management capacity, there is the potential for cumulative effects arising from landtake and development of these sites.</p>	None proposed.
Norfolk Minerals and Waste Development Framework	<p><i>Sets out the spatial vision for future mineral extraction and associated development and waste management facilities in Norfolk from 2011 up to the end of 2026.</i></p> <p>As both strategies suggest the potential for additional waste management capacity, there is the potential for cumulative effects arising from landtake and development of these sites.</p>	None proposed.
North East Lincolnshire Municipal Waste Management Plan- Summary 2016-2019	<p><i>Provides an overview of the measures that North East Lincolnshire Council (NELC) intends to implement to build on the progress made to date on resource management and further enhance: The services provided to residents and The sustainability of the management of Local Authority Collected Waste (LACW) arising in the area</i></p>	

CUMULATIVE EFFECTS WITH OTHER SCHEMES

- 4.4.6. This section of the cumulative effects assessment considers the potential for cumulative effects resulting from the JMWMS combined with other potential schemes being considered in and around the county. Within Lincolnshire the Lincolnshire Minerals and Waste Local Plan comprises of two parts: the core strategy and development management policy document which was adopted on 1st June 2016 and sets out the key principles to guide the future winning and working of minerals and the form of waste management development in the County up to 2031; and the Site Locations document which was adopted on 15th December 2017 and includes specific proposals and policies for the provision of land for mineral and waste development.
- 4.4.7. There are policies introduced in the Lincolnshire Minerals and Waste Local Plan where some cumulative effects are considered likely. These policies are:
- Policy W1: Future requirements for new waste facilities
 - Policy W3: Spatial Strategy for New Waste Facilities
 - Policy W4: Locational Criteria for New Waste Facilities in and around main urban areas
 - Policy W5: Biological Treatment of Waste Including Anaerobic Digestion and Open-Air Composting
 - Policy W6: Landfill
 - Policy W7: Small Scale Waste Facilities
 - Policy W8: Safeguarding Waste Management Sites.
- 4.4.8. There are also policies introduced in the Site Locations document where some cumulative effects are considered likely. These policies are:
- Policy SL3: Waste Site and Area Allocations Table 9 discusses the potential for cumulative effects of these nine policies when combined with possible schemes being considered.

Table 9 – Description of cumulative effects from the JMWMS combined with potential schemes in the county

Plan/Policy	Potential Cumulative Effects	Mitigation/Enhancement Measures
<p>Policy W1: Future requirements for new waste facilities</p>	<p>This policy focuses on the County Council, through the Site Locations document, identifying locations for a range of new or extended waste management facilities within Lincolnshire where these are necessary to meet the predicted gaps for waste arisings in the county up to and including 2031.</p> <p>The introduction of new waste facilities may potentially have a negative cumulative effect on a number of aspects of the environment, such as biodiversity during land take (SEA theme 5) or disrupting watercourses and changes to flood risk (SEA theme 7). However, currently there are no proposals for the specific development of new waste management sites; therefore no cumulative effect is predicted.</p>	<p>Environmental assessment should be undertaken on an individual project level where appropriate. Depending on the nature and location of the scheme, statutory or non-statutory EIA may be required.</p>
<p>Policy SL3: Waste Site and Area Allocations</p>	<p>Future requirements for new waste facilities in order to meet capacity gaps, in accordance with Policy W1 of the Core Strategy and Development Management Policies document, will be provided through the granting of planning permission for waste uses at Vantage Park, Gonerby Moor and other allocated sites and areas where the applicant can demonstrate that the proposal is in accordance with the development plan.</p>	<p>Environmental assessment should be undertaken on an individual project level where appropriate. Depending on the nature and location of the scheme, statutory or non-statutory EIA may be required.</p>
<p>Policy W3: Spatial Strategy for New Waste Facilities</p>	<p>Proposals for new waste facilities, including extensions to existing waste facilities, will be permitted in and around the following main urban areas:</p> <ul style="list-style-type: none"> Lincoln; Boston; Grantham; Spalding; Bourne; Gainsborough; Louth; Skegness; Sleaford; and Stamford. 	<p>Environmental assessment should be undertaken on an individual project level where appropriate. Depending on the nature and location of the scheme, statutory or non-statutory EIA may be required.</p>

	<p>New waste facility schemes proposed around these urban areas may potentially have a negative cumulative impact on sensitive receptors in close proximity to these locations i.e. residents, NIAs, AQMAs, etc.</p>	
<p>Policy W4: Locational Criteria for New Waste Facilities in and around main urban areas</p>	<p>This policy states that new waste facilities will be permitted provided that they would be located on: previously developed and/or contaminated land; or existing or planned industrial/employment land and buildings; or land already in waste management use; or sites allocated in the Site Locations Document; or In the case of biological treatment the land identified in Policy W5.</p> <p>The permission criteria within this policy will potentially result in a positive cumulative effect due no new agricultural land take for waste management uses (SEA theme 11); it would also have positive cumulative effects on the protecting soil quality and quantity (SEA theme 6).</p>	<p>Any new land take required should be kept to the absolute minimum for practical operation of the scheme; where possible existing in-use land and infrastructure should be used to achieve this.</p> <p>Schemes should take opportunities to improve existing infrastructure, such as drainage, and remediate contaminated land, wherever possible.</p>
<p>Policy W5: Biological Treatment of Waste Including Anaerobic Digestion and Open-Air Composting</p>	<p>Planning permission will be granted for anaerobic digestion, open air composting, and other forms of biological treatment of waste outside of those areas specified in Policy W3 provided that proposals accord with all relevant Development Management Policies set out in the Plan;</p> <p>The provision in this policy allows for the development of sites to accommodate food/green waste, which would enable this waste stream to be managed within Lincolnshire. This avoids the requirement to transport this material outside the county, thereby reducing air quality impacts and carbon footprint from transport. However, the operation of such sites has the potential to affect air quality in different ways (dust, odour), potentially leading to cumulative effects with other types of development/operations common in Lincolnshire (agriculture).</p>	<p>Ensure proposed waste management activities or developments undertake air quality assessments as required.</p>
<p>Policy W6: Landfill</p>	<p>Planning permission will only be granted for new landfills or extensions to existing landfills (inert, non-hazardous and hazardous) provided that: it has been demonstrated that the current capacity is insufficient to manage that waste arising in Lincolnshire or its equivalent, which requires disposal to landfill in the County; and</p>	<p>Ensure waste management proposals include sustainable landscape management plans.</p>

	<p>there is a long term improvement to the local landscape and character of the area, with enhanced public access where appropriate; and the development would not cause a significant delay to the restoration of existing waste disposal sites; and the proposals accord with all relevant Development Management and Restoration Policies set out in the Plan.</p> <p>The permission criteria within this policy will potentially result in a positive cumulative effect due no new agricultural land take for waste management uses (SEA theme 11); it could have also have positive cumulative effects on the protecting landscape in the longer term (SEA theme 15).</p>	
Policy W7: Small Scale Waste Facilities	<p>Planning permission will be granted for small scale waste facilities, including small extensions to existing waste facilities, outside of those areas specified in Policy W3 provided that: there is a proven need to locate such a facility outside of the main urban areas; and the proposals accord with all relevant Development Management Policies set out in the Plan; and the facility would be well located to the arisings of the waste it would manage; and they would be located on land which constitutes previously developed and/or contaminated land, existing or planned industrial/employment land, or redundant agricultural and forestry buildings and their curtilages.</p> <p>The permission criteria within this policy will potentially result in a positive cumulative effect due no new agricultural land take for waste management uses (SEA theme 11). There could also be a positive influence on air quality (SEA them 3) as a result of co-locating waste production and management. However, the incremental development of even small scale waste facilities could have negative impacts on biodiversity, landscape, noise, geology and soils, water and cultural heritage.</p>	<p>Any new land take required should be kept to the absolute minimum for practical operation of the scheme; where possible existing in-use land and infrastructure should be used to achieve this.</p> <p>Schemes should take opportunities to improve existing infrastructure, such as drainage, and remediate contaminated land, wherever possible.</p>
Policy W8: Safeguarding Waste Management Sites	<p>The County Council will seek to safeguard existing and allocated waste management facilities from redevelopment to a non-waste use and/or the encroachment of incompatible development.</p> <p>By retaining existing waste sites, this policy facilitates the avoidance of landtake for new waste management infrastructure. This is positive for those SEA themes potentially affected most by landtake (agriculture, biodiversity etc).</p>	<p>Any new land take required should be kept to the absolute minimum for practical operation of the scheme; where possible existing in-use land and infrastructure should be used to achieve this.</p>

5 MITIGATION AND MONITORING

5.1 INTRODUCTION

- 5.1.1. The SEA Regulations require that mitigation measures are considered to prevent, reduce or offset any significant adverse effects on the environment of implementing the plan. The guidance states that mitigation measures include both proactive avoidance of adverse effects and actions taken after potential effects are identified.
- 5.1.2. Whilst there were no significant negative effects identified in the assessment, there are a number of unknown effects, as well as the potential for some significant positive effects. The measures proposed below have therefore been identified in order to ensure that positive effects and the potential for enhancement are realised.
- 5.1.3. The SEA Regulations also require that monitoring is undertaken on a plan so that the significant effects of implementation can be identified and remedial action imposed. Monitoring also provides an important measure of the performance of the JMWMS against environmental objectives and targets. Monitoring is also used to manage uncertainty, improve knowledge, enhance transparency and accountability, and to manage environmental information.

5.2 PROPOSED MITIGATION

- 5.2.1. The mitigation measures proposed in Table 10 are geared towards the effects of the proposed JMWMS objectives, which are likely to result with the implementation of the JMWMS. The proposed mitigation measures set out below, where applicable, should be considered for each individual waste action/scheme. The measures should then be incorporated into the design, construction and operational stages of the proposed schemes.

Table 10 - Proposed Mitigation Measures

	Proposed Mitigation
1	Should the development of additional waste management capacity be required, environmental assessment should be undertaken on an individual project level where appropriate. Depending on the nature and location of the scheme, statutory EIA or other environmental assessments may be required.
2	Construction should be undertaken in line with a Construction Management Plan which should include measures to manage construction traffic, reduce environmental impacts and make the most of opportunities for enhancement such as landscape and habitat planting. CMPs should also encourage the use of best practice construction methods and equipment.
3	Where changes in the provision of waste collection services are proposed, in terms of materials collected and frequency, consideration will be given to the duties of each Local Authority in relation to noise and air quality.
4	Consideration of low or zero emission vehicles, such as hybrid or electric, should be considered.
5	Schemes which involve information provision should consider whether it is possible to include information such as a) flood alerts or weather events affecting waste infrastructure to increase resilience to climate change, or b) that relating to seasonal variations in waste such as green waste during the summer, or food/packaging waste during holidays.
6	Collaboration with environmental organisations should be considered, particularly where schemes are close to areas of environmental interest e.g. designated sites, habitat, to ensure opportunities for study and conservation are explored.
7	Undertake collaboration with local schools, youth groups, businesses and companies as part of any change in waste collection services or information provision with regards to recycling and waste avoidance.

8	Ensure proposed waste management activities or developments undertake air quality assessments as required.
9	Ensure waste management proposals include sustainable landscape management plan as part of their design and operation.
10	Consult with neighbouring administrative areas as to the opportunities for the use and/or management of various waste streams.
11	Ensure SEA recommendations are linked to future waste management actions/schemes, by making use of the SEA objectives and indicators in the development of action/scheme specific monitoring.

5.3 PROPOSED MONITORING

- 5.3.1. The existing JMWMS sets out how an action plan, which will break down the actions and tasks required to meet Lincolnshire’s targets and objectives set in the strategy, will be prepared. The delivery of the tasks within the action plan will be monitored and reviewed annually to ensure the partnership would deliver the targets it sets itself through the strategy. Where significant changes occur the action plan will be updated accordingly.
- 5.3.2. The action plan will establish how the strategy will be delivered, considering what will be required by the Partnership in terms of:
- Action required to deliver waste minimisation and further increase recycling and composting,
 - Future changes or improvements to collection services (residual waste, dry recycling, garden waste and potential kitchen waste),
 - Investments required to deliver future residual waste treatment facility and additional recycling infrastructures.
- 5.3.3. SEA monitoring is related more to the significant or uncertain environmental effects of the JMWMS. The proposed monitoring programme is set out in Table 11.

Table 11 – Proposed monitoring indicators

SEA Theme	Potential Indicators	Proposed Monitoring Indicators
Climatic Factors		
1. To reduce carbon emissions from energy use.	Amount of fuel used in waste management collections per annum.	Amount and type of fuel used in waste management collections per annum.
2. To contribute to a circular economy through the use of waste management collection infrastructure and recycled materials.	Replacement bins that are recycled at the end of their useful life	Replacement bins that are recycled at the end of their useful life
Air Quality		
3. To prevent deterioration of air quality within the county and where possible make improvements.	Percentage of Euro VI engines, electric vehicles, hybrid vehicles, biogas or hydrogen fuelled vehicles operating on behalf of the local authorities in a waste management related capacity per annum	Percentage of Euro VI engines, electric vehicles, hybrid vehicles, biogas or hydrogen fuelled vehicles operating on behalf of the local authorities in a waste management related capacity per annum
Noise		

SEA Theme	Potential Indicators	Proposed Monitoring Indicators
4. To minimise the effects of noise in the identified NIAs.	Number of planning applications for new waste management infrastructure that consider the appropriateness of access through NIAs	Number of planning applications for new waste management infrastructure that consider the appropriateness of access through NIAs
Biodiversity, Flora and Fauna		
5. To maintain biodiversity in Lincolnshire	Significant effects upon biodiversity identified during the planning consenting process for new waste management infrastructure.	Area of greenfield land lost to new waste management uses per annum Uptake of biodiversity net positive initiatives at new and existing waste management sites
Geology and Soils		
6. Promote the conservation and wise use of land, and protect soil quality and quantity.	Tonnes of green waste that is used as compost per annum	Tonnes of green waste that is used as compost per annum
	Fly tipping incidents per annum	Fly tipping incidents per annum
Water		
7. To protect water courses and improve the quality of water and wastewater discharges resulting from waste management activities.	Number of surface water discharge applications for new waste management infrastructure agreed by the Environment Agency.	Number of surface water discharge applications for new waste management infrastructure agreed by the Environment Agency.
Population and Human Health		
8. To encourage economic investment through waste management	Monetary value of new waste management infrastructure developed per annum	Monetary value of new waste management infrastructure developed per annum
9. To ensure that the growing population of Lincolnshire does not lead to an increase in the percentage of waste disposed of.	Total percentage of waste recycled and composted per annum	Total percentage of waste recycled and composted per annum
	Total percentage of waste recovered per annum	Total percentage of waste recovered per annum
Material Assets		
10. To facilitate opportunities for recycling within residential development.	Proportion of housing scheme planning approvals where dedicated waste management storage considerations are included in the application per annum	Proportion of housing scheme planning approvals where dedicated waste management storage considerations are included in the application per annum
11. To protect agricultural resources from waste management activities	Area of agricultural land lost to waste management uses per annum	Area of agricultural land lost to waste management uses per annum

SEA Theme	Potential Indicators	Proposed Monitoring Indicators
12. To encourage material re-use/waste avoidance.	Waste generated per capita per annum	Waste generated per capita per annum
13. To ensure sustainable use of resources through effective waste management.	Amount of energy generated by the EfW (as a measure of non-combustible diversion rates) per annum	Amount of energy generated by the EfW (as a measure of non-combustible diversion rates) per annum
	Amount of heat exported from the EfW.	Amount of heat exported from the EfW.
	Percentage of recyclables in residual waste per month (as an indicator of resources lost to less sustainable management)	Percentage of recyclables in residual waste per month (as an indicator of resources lost to less sustainable management)
Cultural Heritage		
14. Protect and enhance the historic environment, heritage assets and their setting (including architectural and archaeological heritage)	Number of archaeological investigations and cultural heritage setting assessments undertaken for new waste management infrastructure.	Number of archaeological investigations and cultural heritage setting assessments undertaken for new waste management infrastructure.
Landscape		
15. To protect and enhance the countryside in Lincolnshire	The quality of Landscape character areas, Area of Green Belt land and Area designated as AONB	Area of landscape character area, green belt or AONB designation lost to waste management uses per annum

Equality Impact Analysis to enable informed decisions

The purpose of this document is to:-

- I. help decision makers fulfil their duties under the Equality Act 2010 and
- II. for you to evidence the positive and adverse impacts of the proposed change on people with protected characteristics and ways to mitigate or eliminate any adverse impacts.

Using this form

This form must be updated and reviewed as your evidence on a proposal for a project/service change/policy/commissioning of a service or decommissioning of a service evolves taking into account any consultation feedback, significant changes to the proposals and data to support impacts of proposed changes. The key findings of the most up to date version of the Equality Impact Analysis must be explained in the report to the decision maker and the Equality Impact Analysis must be attached to the decision making report.

****Please make sure you read the information below so that you understand what is required under the Equality Act 2010****

Equality Act 2010

The Equality Act 2010 applies to both our workforce and our customers. Under the Equality Act 2010, decision makers are under a personal duty, to have due (that is proportionate) regard to the need to protect and promote the interests of persons with protected characteristics.

Protected characteristics

The protected characteristics under the Act are: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation.

Section 149 of the Equality Act 2010

Section 149 requires a public authority to have due regard to the need to:

- Eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by/or under the Act
- Advance equality of opportunity between persons who share relevant protected characteristics and persons who do not share those characteristics
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The purpose of Section 149 is to get decision makers to consider the impact their decisions may or will have on those with protected characteristics and by evidencing the impacts on people with protected characteristics decision makers should be able to demonstrate 'due regard'.

Decision makers duty under the Act

Having had careful regard to the Equality Impact Analysis, and also the consultation responses, decision makers are under a personal duty to have due regard to the need to protect and promote the interests of persons with protected characteristics (see above) and to:-

- (i) consider and analyse how the decision is likely to affect those with protected characteristics, in practical terms,
- (ii) remove any unlawful discrimination, harassment, victimisation and other prohibited conduct,
- (iii) consider whether practical steps should be taken to mitigate or avoid any adverse consequences that the decision is likely to have, for persons with protected characteristics and, indeed, to consider whether the decision should not be taken at all, in the interests of persons with protected characteristics,
- (iv) consider whether steps should be taken to advance equality, foster good relations and generally promote the interests of persons with protected characteristics, either by varying the recommended decision or by taking some other decision.

Conducting an Impact Analysis

The Equality Impact Analysis is a process to identify the impact or likely impact a project, proposed service change, commissioning, decommissioning or policy will have on people with protected characteristics listed above. It should be considered at the beginning of the decision making process.

The Lead Officer responsibility

This is the person writing the report for the decision maker. It is the responsibility of the Lead Officer to make sure that the Equality Impact Analysis is robust and proportionate to the decision being taken.

Summary of findings

You must provide a clear and concise summary of the key findings of this Equality Impact Analysis in the decision making report and attach this Equality Impact Analysis to the report.

Impact – definition

An impact is an intentional or unintentional lasting consequence or significant change to people's lives brought about by an action or series of actions.

How much detail to include?

The Equality Impact Analysis should be proportionate to the impact of proposed change. In deciding this asking simple questions “Who might be affected by this decision?” “Which protected characteristics might be affected?” and “How might they be affected?” will help you consider the extent to which you already have evidence, information and data, and where there are gaps that you will need to explore. Ensure the source and date of any existing data is referenced.

You must consider both obvious and any less obvious impacts. Engaging with people with the protected characteristics will help you to identify less obvious impacts as these groups share their perspectives with you.

A given proposal may have a positive impact on one or more protected characteristics and have an adverse impact on others. You must capture these differences in this form to help decision makers to arrive at a view as to where the balance of advantage or disadvantage lies. If an adverse impact is unavoidable then it must be clearly justified and recorded as such, with an explanation as to why no steps can be taken to avoid the impact. Consequences must be included.

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Proposals for more than one option If more than one option is being proposed you must ensure that the Equality Impact Analysis covers all options. Depending on the circumstances, it may be more appropriate to complete an Equality Impact Analysis for each option.

The information you provide in this form must be sufficient to allow the decision maker to fulfil their role as above. You must include the latest version of the Equality Impact Analysis with the report to the decision maker. Please be aware that the information in this form must be able to stand up to legal challenge.

Background Information

Title of the policy / project / service being considered	Joint Municipal Waste Management Strategy for Lincolnshire	Person / people completing analysis	Matthew Michell Senior Commissioning Officer (Waste)
Service Area	Planning Services	Lead Officer	Neil McBride Planning Manager
Who is the decision maker?	Each individual LWP member authority	How was the Equality Impact Analysis undertaken?	Desk top exercise initially. Now includes feedback from stakeholder consultation which specifically asked about impacts on protected characteristics.
Date of meeting when decision will be made	Click here to enter a date.	Version control	V1.3
Is this proposed change to an existing policy/service/project or is it new?	Existing policy/service/project	LCC directly delivered, commissioned, re-commissioned or de-commissioned?	Commissioned
Describe the proposed change	Revision of the Joint Municipal Waste Management Strategy which sets out the Lincolnshire Waste Partnership's strategic vision for waste management services.		

Evidencing the impacts

In this section you will explain the difference that proposed changes are likely to make on people with protected characteristics. To help you do this first consider the impacts the proposed changes may have on people without protected characteristics before then considering the impacts the proposed changes may have on people with protected characteristics.

You must evidence here who will benefit and how they will benefit. If there are no benefits that you can identify please state 'No perceived benefit' under the relevant protected characteristic. You can add sub categories under the protected characteristics to make clear the impacts. For example under Age you may have considered the impact on 0-5 year olds or people aged 65 and over, under Race you may have considered Eastern European migrants, under Sex you may have considered specific impacts on men.

Data to support impacts of proposed changes

When considering the equality impact of a decision it is important to know who the people are that will be affected by any change.

Population data and the Joint Strategic Needs Assessment

The Lincolnshire Research Observatory (LRO) holds a range of population data by the protected characteristics. This can help put a decision into context. Visit the LRO website and its population theme page by following this link: <http://www.research-lincs.org.uk> If you cannot find what you are looking for, or need more information, please contact the LRO team. You will also find information about the Joint Strategic Needs Assessment on the LRO website.

Workforce profiles

You can obtain information by many of the protected characteristics for the Council's workforce and comparisons with the labour market on the [Council's website](#). As of 1st April 2015, managers can obtain workforce profile data by the protected characteristics for their specific areas using Agresso.

Positive impacts

The proposed change may have the following positive impacts on persons with protected characteristics – If no positive impact, please state 'no positive impact'.

Age	14% of consultation responses identified a positive impact, including: <ul style="list-style-type: none">- Environmental benefits good for future generations- Service improvements could improve accessibility for those with mobility issues, both at kerbside and at Household Waste Recycling Centres
Disability	9% of consultation responses identified a positive impact, including: <ul style="list-style-type: none">- Service changes could improve accessibility for those with mobility issues, both at kerbside and at Household Waste Recycling Centres
Gender reassignment	no positive impact
Marriage and civil partnership	no positive impact
Pregnancy and maternity	9% of consultation responses identified a positive impact, including: <ul style="list-style-type: none">- Service changes could improve accessibility for those with mobility issues, both at kerbside and at Household Waste Recycling Centres
Race	no positive impact
Religion or belief	no positive impact

Sex	no positive impact
Sexual orientation	no positive impact

If you have identified positive impacts for other groups not specifically covered by the protected characteristics in the Equality Act 2010 you can include them here if it will help the decision maker to make an informed decision.

Many consultation responses identified that the environmental benefits of the JMWMS would be good for everyone. For most groups more responses identified a positive impact than a negative one.

Adverse/negative impacts

You must evidence how people with protected characteristics will be adversely impacted and any proposed mitigation to reduce or eliminate adverse impacts. An adverse impact causes disadvantage or exclusion. If such an impact is identified please state how, as far as possible, it is justified; eliminated; minimised or counter balanced by other measures.

If there are no adverse impacts that you can identify please state 'No perceived adverse impact' under the relevant protected characteristic.

Negative impacts of the proposed change and practical steps to mitigate or avoid any adverse consequences on people with protected characteristics are detailed below. If you have not identified any mitigating action to reduce an adverse impact please state 'No mitigating action identified'.

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Age	19% of consultation responses identified a negative impact, including: <ul style="list-style-type: none">- May be confused by service changes. Mitigation = Focussed communications through a variety of methods for all- May have difficulty moving heavy wheelie bins. Mitigation = Assisted collections available- May have difficulty with repeated emptying of kitchen food caddy. Mitigation = kitchen caddy is very small with liner making it easy to remove- Possible infection from decaying food waste. Mitigation = Lidded kitchen caddy; exterior bin; weekly collections- Difficult to access Household Waste Recycling Centres or bring banks. Mitigation = Proactive assistance from site staff
Disability	21% of consultation responses identified a negative impact, including: <ul style="list-style-type: none">- May be confused by service changes. Mitigation = Focussed communications through a variety of methods for all- May have difficulty moving heavy wheelie bins. Mitigation = Assisted collections available- May have difficulty with repeated emptying of kitchen food caddy. Mitigation = kitchen caddy is very small with liner making it easy to remove- Possible infection from decaying food waste. Mitigation = Lidded kitchen caddy; exterior bin; weekly collections- Difficult to access HWRC's or bring banks. Mitigation = Proactive assistance from site staff is already available- Access to plastic recycling if kerbside service removed due to Deposit Return Scheme. Mitigation = Consideration of alternative service if this happens

Gender reassignment	No perceived adverse impact
Marriage and civil partnership	No perceived adverse impact
Pregnancy and maternity	<p>13% of consultation responses identified a negative impact, including:</p> <ul style="list-style-type: none"> - May be confused by service changes (a consultation response suggested this). Mitigation = Focussed communications through a variety of methods for all - May have difficulty moving heavy wheelie bins. Mitigation = Assisted collections available - May have difficulty with repeated emptying of kitchen food caddy. Mitigation = kitchen caddy is very small with liner making it easy to remove - Possible infection from decaying food waste. Mitigation = Lidded kitchen caddy; exterior bin; weekly collections - Difficult to access HWRC's or bring banks. Mitigation = Proactive assistance from site staff - Nappies & formula milk produce extra waste. Mitigation = partners continue to promote breast-feeding to those who are able and reusable nappies
Race	<p>4% of consultation responses identified a negative impact, including:</p> <ul style="list-style-type: none"> - May be confused by service changes (where English is not first language). Mitigation = Focussed communications through a variety of methods
Religion or belief	No perceived adverse impact
Sex	<p>6% of consultation responses identified a negative impact, including:</p> <ul style="list-style-type: none"> - May have difficulty moving heavy wheelie bins (a consultation response suggested this). Mitigation = Assisted collections available - Difficult to access HWRC's or bring banks ("parents with children and single parent families being more likely to be female"). Mitigation = Proactive assistance from site staff

Sexual orientation	No perceived adverse impact
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If you have identified negative impacts for other groups not specifically covered by the protected characteristics under the Equality Act 2010 you can include them here if it will help the decision maker to make an informed decision.

Residents of terraced properties - Lack of space for storing multiple bins. Mitigation = Consideration of alternative service

Stakeholders

Stake holders are people or groups who may be directly affected (primary stakeholders) and indirectly affected (secondary stakeholders)

You must evidence here who you involved in gathering your evidence about benefits, adverse impacts and practical steps to mitigate or avoid any adverse consequences. You must be confident that any engagement was meaningful. The Community engagement team can help you to do this and you can contact them at consultation@lincolnshire.gov.uk

State clearly what (if any) consultation or engagement activity took place by stating who you involved when compiling this EIA under the protected characteristics. Include organisations you invited and organisations who attended, the date(s) they were involved and method of involvement i.e. Equality Impact Analysis workshop/email/telephone conversation/meeting/consultation. State clearly the objectives of the EIA consultation and findings from the EIA consultation under each of the protected characteristics. If you have not covered any of the protected characteristics please state the reasons why they were not consulted/engaged.

Objective(s) of the EIA consultation/engagement activity

The questionnaire for the consultation on the overall contents of the JMWMS included a question asking respondents to identify any impacts as a result of protected characteristics.

Who was involved in the EIA consultation/engagement activity? Detail any findings identified by the protected characteristic

Age	Positive and negative impacts have been updated following consultation. Almost one fifth of consultation respondents identified a negative impact, a slightly smaller number identified benefits. These are listed in the impacts sections above.
Disability	Over 20% of consultation respondents identified potential negative impacts, which is representative of the estimated population in the county. All matters have been reviewed and mitigation identified in the impacts sections above.
Gender reassignment	
Marriage and civil partnership	
Pregnancy and maternity	Matters raised during consultation have been noted, alongside their mitigation, in the impacts section above.
Race	A representative four percent of respondents identified issues and mitigation is in place, as identified above.
Religion or belief	

Sex	A small number of consultation respondents identified issues relating to gender and have mitigations in place.
Sexual orientation	
Are you confident that everyone who should have been involved in producing this version of the Equality Impact Analysis has been involved in a meaningful way? The purpose is to make sure you have got the perspective of all the protected characteristics.	Yes. Because of data protection concerns (asking so many detailed questions might have led to the unintentional identification of some respondents), the JMWMS consultation survey did not ask people for personal information. However, the consultation on the overall contents of the JMWMS allowed anyone with an interest in our waste services to identify any impacts on those with protected characteristics.
Once the changes have been implemented how will you undertake evaluation of the benefits and how effective the actions to reduce adverse impacts have been?	Any impacts identified through the survey were assessed and are summarised in this EIA. This EIA will be reviewed in Summer 2019, around 6 months after the anticipated adoption of the JMWMS..

Further Details

Are you handling personal data?	<p>No</p> <p>If yes, please give details.</p>
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Actions required	Action	Lead officer	Timescale
Include any actions identified in this analysis for on-going monitoring of impacts.	Review around 6 months after the anticipated adoption of the JMWMS..	Neil McBride LCC Planning Manager	Summer 2019
Signed off by		Date	Click here to enter a date.