

Surrey County Council Minerals and Waste  
Planning Policy

Surrey Waste Local Plan

# **Surrey Waste Local Plan Draft Plan**

October 2017



**SURREY**

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# 1 Introduction

## 1.1 Purpose of the Waste Local Plan

- 1.1.1 A large amount of waste is generated by Surrey's homes and businesses and Surrey County Council needs to ensure that sufficient land is available for the waste facilities needed to manage it. It is essential that those facilities do not result in unacceptable harm to the environment and human health. It is important that Surrey's waste is managed sustainably and this includes the county working towards sending zero waste to landfill.
- 1.1.2 “The overarching challenge facing local planning authorities is how to balance development pressures in this area of buoyant economic growth close to London, Heathrow and Gatwick without compromising the quality of life of its residents and the high quality natural and built environment”<sup>1</sup>. The need to balance the development of waste management facilities is no different.
- 1.1.3 As the waste planning authority<sup>2</sup> (WPA) Surrey County Council is required to produce a waste local plan, known as the Surrey Waste Local Plan (SWLP), to show how and where waste will be managed in Surrey in the future. The SWLP sets out the planning framework for the development of waste management facilities and is used in determining planning applications for waste facilities.
- 1.1.4 The SWLP is intended to ensure that land is available so that sufficient waste management facilities can be provided to manage the equivalent amount of waste arising in Surrey. The SWLP should also provide policies which ensure these facilities are well located and do not result in significant adverse impacts on the environment.
- 1.1.5 It is essential that the SWLP is kept up to date to provide a robust policy framework to support the sustainable management of waste. The new SWLP will cover the period from 2018 to 2033 and will help to ensure that Surrey has land available to deliver the waste management infrastructure needed to support growth and development.
- 1.1.6 This Plan forms part of the overall development framework for Surrey. Other waste and minerals related policy can be found in the Surrey Minerals Plan (2011), the Aggregates Recycling Joint Development Plan Document (2013) and the Minerals Site Restoration Supplementary Planning Document (2011). The planning policy for non-waste and minerals related development can be found in the Local Plans of the District and Borough Councils in Surrey.
- 1.1.7 When determining applications all relevant policies of the development framework, as well as national policy, will be taken into account.

## 1.2 Preparing the new Surrey Waste Local Plan

- 1.2.1 There are several stages in preparing the new SWLP as set out in legislation<sup>3</sup>, many of which offer opportunities for residents, businesses and other key stakeholders to comment. This document is a draft plan subject to public consultation between 1 November 2017 and 7 February 2018 as a second stage of consultation in preparing the new SWLP<sup>4</sup> (shown as Stage 3 in Figure 1 below).



Figure 1 Image showing stages of preparing the new Surrey Waste Local Plan (SWLP)

- 1.2.2 This draft plan provides the vision, strategic objectives and draft policies which are intended to guide the development of waste management infrastructure in Surrey up until 2033. This document reflects the responses and preferred options from the Issues and Options consultation which was held between 2 September and 25 November 2016.
- 1.2.3 Following this consultation Surrey County Council will be publishing and consulting on a pre-submission draft plan which will then be submitted to the Government for independent examination including any comments from stakeholders.

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<sup>1</sup> Surrey Local Strategic Statement (Interim) 2016

<sup>2</sup> The Town and Country Planning (Prescription of County Matters) (England) Regulations 2003 prescribe classes of waste operations and uses of land that should be dealt with as “county matters”.

<sup>3</sup> Town and Country Planning (Local Planning) (England) Regulations 2012

<sup>4</sup> In accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012

### 1.3 Status of the Surrey Waste Local Plan

- 1.3.1 The current Surrey Waste Plan was adopted in May 2008. It has been assessed as being consistent with the NPPF and NPPW and compliant with the EU Waste Framework Directive<sup>5</sup>. It will remain extant as part of the development framework until replaced by the SWLP.
- 1.3.2 This draft plan is a material consideration in any planning decision and the emerging policies may therefore be given weight in reaching a planning decision. Paragraph 216 of the National Planning Policy Framework (NPPF) states that decision-takers may give weight (unless material considerations indicate otherwise) to relevant policies in emerging plans according to:
- The stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given);
  - The extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
  - The degree of consistency of the relevant policies in the emerging plan to the policies in the NPPF (the closer the policies in the emerging plan to the policies in the NPPF, the greater the weight that may be given). Consistency to policies in the National Planning Policy for waste (NPPW) will also be relevant.
- 1.3.3 As this is the first stage of consultation on a number of these issues there will not be information available on objections or the county council's response. Greater weight will be given to the pre-submission draft, when published, which will be prepared in the light of comments received from stakeholders during this consultation.

### 1.4 Site Allocations

- 1.4.1 Alongside this draft version of the new SWLP a short list of sites considered potentially suitable for accommodating waste management development has also been published for consultation. Comments received during the draft plan consultation on these sites and the draft SWLP will be taken into account in deciding which sites should be proposed for allocation in the next draft of the SWLP.
- 1.4.2 The report which sets out how sites have been identified and selected as suitable is available to view on the following website: webpage: [www.surreycc.gov.uk/newwasteplan](http://www.surreycc.gov.uk/newwasteplan). The allocation of sites provides additional certainty to communities and developers about where the additional waste management capacity required might be developed.

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<sup>5</sup> See Self-Assessment Annexe 2 of Report to Cabinet on review of Minerals & Waste Development Scheme 16 Dec 2014.

## 2 Spatial Context

### 2.1 Introduction

- 2.1.1 Surrey's location and unique environment play an important role in shaping Surrey's economy through their impact on the economy, quality of life, business sectors, and availability of development land and distribution of population. These factors present opportunities and challenges for the future growth and will influence the form and location of new waste development.

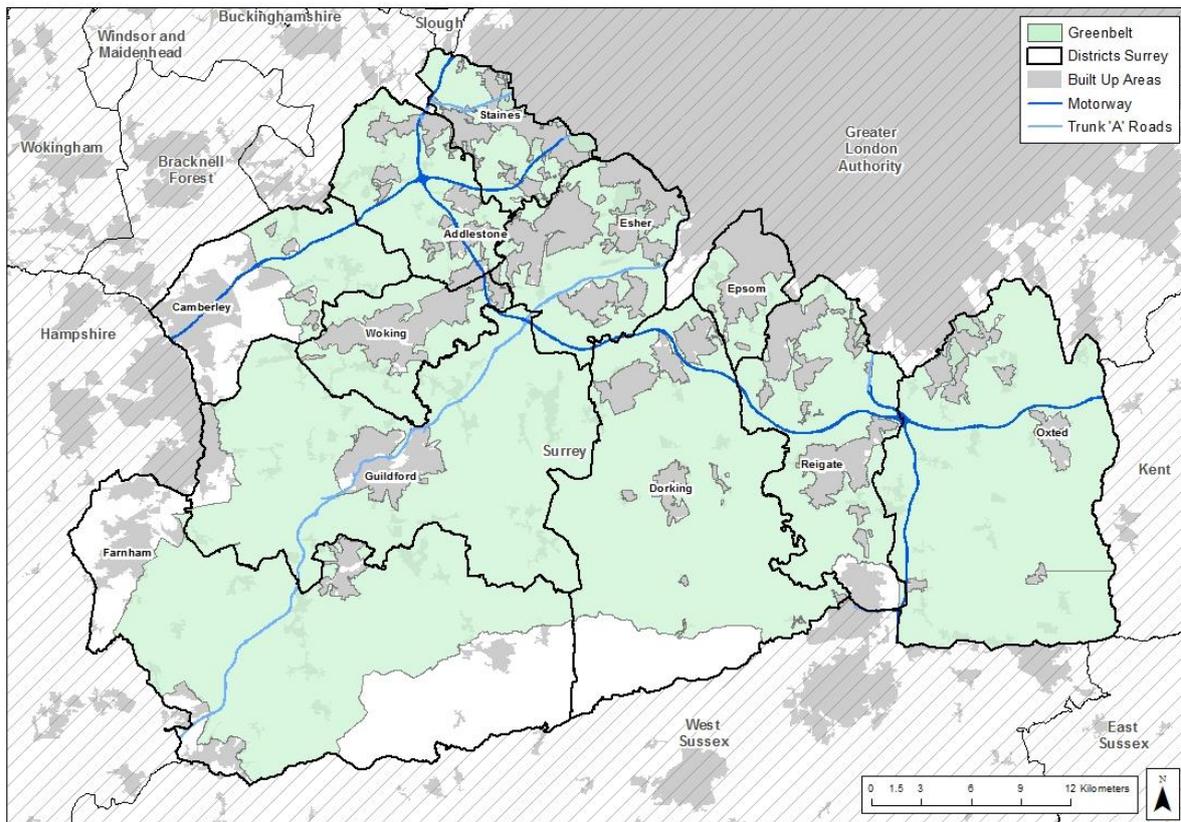


Figure 2 Map of Surrey showing urban areas, Green Belt boundaries and major transport networks

## 2.2 Population

- 2.2.1 The 2011 census found that there were 1.14 million people living in Surrey. Estimates for 2015 show an increase in the total population to 1.17 million people. While the majority of Surrey can be classed as rural in nature, dense urban areas are located in the north of the county, near the boundary with London, and the large towns of Guildford, Woking, Reigate/Redhill and Farnham.
- 2.2.2 The projected population growth for Surrey, suggests an increase from 1.17 million people to 1.37 million by 2037<sup>6</sup>. There are approximately 483,000 housing units existing across Surrey with a further 86,000 housing units planned between 2015 and 2033. Surrey County Council need to plan for the infrastructure needed to support these new homes and this includes waste management infrastructure.

## 2.3 Economy

- 2.3.1 The South East is a significant contributor to the UK economy. Surrey's economy is the largest contributor to the South East economy and in 2014 was worth £37.5 billion. Surrey has a higher gross value added (GVA) per person than the rest of the major population centres in England, except London. In 2015, Surrey had a total of 61,430 enterprises, over 90% of which were small businesses with 0-9 employees<sup>7</sup>.
- 2.3.2 Waste management is a key component of a modern economy. All businesses depend on the efficient management of their waste and the waste management sector itself will generate employment and add value to the local economy.

## 2.4 Transport Infrastructure

- 2.4.1 Surrey is located in close proximity to London and both Gatwick and Heathrow Airports. The strategic road network, comprising motorways and trunk roads, has evolved principally to serve London, with several nationally important routes passing through the county, including the M3, M23, M25 and the A3.
- 2.4.2 Surrey roads are known to experience congestion and Surrey County Council are seeking to promote development which includes options for sustainable transport. However, there are a lack of alternative transport options in the county and so Surrey County Council recognises the importance of road transport.

## 2.5 Nature Conservation and biodiversity

- 2.5.1 Surrey supports a diverse range of habitats and species, ranging from the chalk grasslands and woodlands of the North Downs, through scarce flood meadows along the rivers Wey and Mole, to the extensive heaths, bogs and acid grasslands of the Thames terrace gravels and Wealden sandstone.

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<sup>6</sup> Department for Communities and Local Government (DCLG) Number of Dwellings by Tenure and District <https://data.gov.uk/dataset/number-of-dwellings-by-tenure-and-district>

<sup>7</sup> 'What does Surrey's business growth look like?' (2015) <https://www.surreyi.gov.uk/grouppage.aspx?groupid=26>

2.5.2 Surrey is also home to around 70 specially protected species and at least 337 species recognised as being a priority for conservation. Numerous sites within the county have been designated for protection on the grounds of nature conservation and biodiversity at local, national and international levels. At least 4% of Surrey is 'semi-natural ancient woodland'. Ancient woodlands are those that are known to have had continuous tree cover since at least 1600 AD. They are found throughout Surrey, with particular concentrations in the North Downs and the Weald. Ancient woodlands, and veteran trees, are likely to have biodiversity interest, as well as cultural and historical significance.

## 2.6 Landscape

- 2.6.1 Surrey has a great variety of landscape due to its varied geology, landform and soils. It contains the flat areas in the Thames Basin, the hills of the North Downs and Wealden Greensand, large expanses of open heathland, enclosed wooded gills, river valleys and water bodies, intimate small scale farmland, and open meadows.
- 2.6.2 Woodland covers 22% of the county, but heathland and chalk downland are also particularly characteristic of Surrey. Farmland, including that of the Low Weald, is another main component of the landscape. The two river valleys of the Wey and Mole cut through these landscapes, flowing from south to north.
- 2.6.3 The Surrey Hills Area of Outstanding Natural Beauty (AONB) and a small area of the High Weald AONB cover approximately 26% of the area of Surrey. They contain land important for woodland and agricultural production, as well as providing recreational opportunities.

## 2.7 Green Belt

- 2.7.1 Approximately three quarters of the land within Surrey (some 121,941 hectares or 73%), is covered by the Metropolitan Green Belt, which has played an important part in helping to safeguard the rural character of much of the county and the setting and character of its historic towns.

## 2.8 Heritage and Archaeology

- 2.8.1 Surrey is rich in heritage assets from nationally important Palaeolithic sites, Roman remains and Medieval villages, through to the remains of Britain's pioneering industrial heritage and recently decommissioned cold-war military installations. Surrey has 197 Scheduled Monuments, 234 designated County Sites of Archaeological Importance and 810 individual Areas of High Archaeological Potential. This equates to approximately 4159 hectares (2.5% of the County).

2.8.2 Surrey has 47 registered parks and gardens, totalling in the region of 2,925 hectares (1.8% of the County). Surrey's archaeological and designated historic landscape requires careful management and consideration. In addition, Surrey has 6,571 statutory listed buildings, including 104 at Grade I and 347 at Grade II\*. There are 278 conservation areas in Surrey, totalling 4,584 hectares or 2.7% of the county.

## 2.9 Water Environment

2.9.1 For each of the major catchments in the UK a river basin management plan (RBMP) has been prepared, which provides information about the current status of the different aspects of the water environment and sets targets for their improvement by 2027. The county of Surrey contains waterbodies and catchments that lie within the areas covered by the Thames RBMP and the South East RBMP.

2.9.2 Of the 104 surface watercourses, lakes, canals and transfer channels that are either located in Surrey or have parts of their catchments located in Surrey, only 18 (17.3%) are currently of 'good' overall status. The majority are of either 'moderate' overall status (58 or 55.7%) or 'poor' overall status (27 or 25.9%), with 1 watercourse currently classified as being of 'bad' overall status.

2.9.3 The majority of the groundwater bodies beneath Surrey have been assessed by the Environment Agency as currently being of a 'poor' overall status, due to issues with the quantitative status of the resource, the chemical status of the resource or a combination of the two. Only two groundwater bodies underlying Surrey are currently classified as being of 'good' overall status.

## 2.10 Flood Risk

2.10.1 Flood risk is a combination of two components; the probability of a particular flood incident occurring and the impact that the incident may cause. The risk of flooding is made worse by the potential impact of climate change. Flooding arises in a variety of forms and is influenced by weather (particularly rainfall events), topography and patterns of development. Sources of flooding can include reservoirs, rivers, the sea, rainfall and rising groundwater.

2.10.2 In Surrey (especially in the northwest of the county), the combination of a large population, low lying land and a significant number of watercourses, increase the probability of people, property and the environment being adversely affected by any flood events that do occur.

## 3 Policy Context

### 3.1 European Waste Policy

#### Waste Framework Directive (2008/98/EC)

- 3.1.1 The Waste Framework Directive (WFD), as amended, sets requirements for the collection, transport, recovery and disposal of waste. The WFD includes a requirement to apply the 'waste hierarchy' when planning for waste management. The waste hierarchy is a system of prioritising the different ways in which waste can be managed with the most sustainable method, prevention, at the top of hierarchy, and the least, disposal, at the bottom.

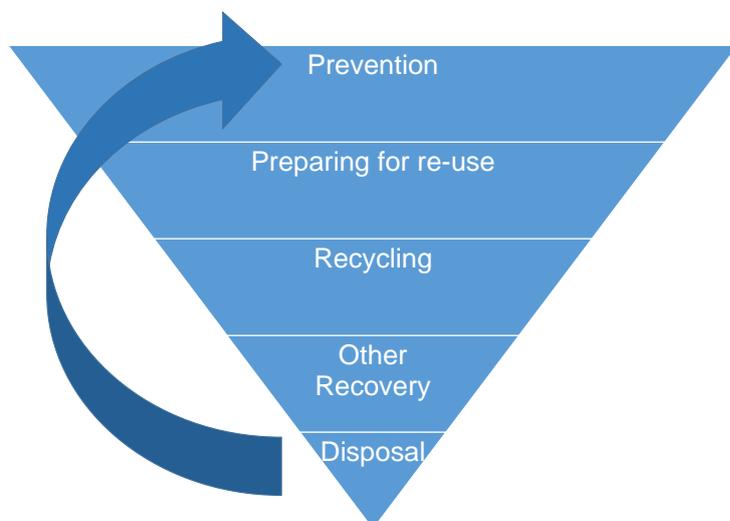


Figure 3 Image of the Waste Hierarchy

- 3.1.2 The WFD also ensures planning authorities have regard to the principles of 'self-sufficiency' and 'proximity'. This means that local authorities should include provision for sufficient capacity and enable the delivery of facilities in the right place at the right time.

#### Hazardous Waste Directive (1991/689/EEC)

- 3.1.3 Waste is generally considered hazardous if it, or the material or substances it contains, pose a risk to human or environmental health. As hazardous waste poses a higher risk to the environment and human health strict controls apply.
- 3.1.4 WPAs are expected to plan for the volume of waste arising in their area this may include waste management facilities to deal with hazardous waste. However, it is accepted that, often, the provision of specialist facilities for wastes that arise in relatively small quantities, or require specialist treatment technologies, will require co-ordination at a more regional or national level.

### Landfill Directive (1999/31/EC)

- 3.1.5 The Landfill Directive was introduced in July 1999. The Landfill Directive sets out requirements for the location, management, engineering, closure and monitoring for landfills. The Landfill Directive also includes requirements relating to the characteristics of the waste to be landfilled. Council Decision 03/33/EC supports the Landfill Directive by providing criteria and procedures for the acceptance of waste at landfills. Landfill tax is a key fiscal mechanism in enabling the UK to meet its targets set out in the Landfill Directive.

### Waste Incineration Directive (2000/76/EC)

- 3.1.6 The Waste Incineration Directive (as amended) covers new facilities and existing facilities and imposes strict emission standards for incineration technologies addressing air pollution to prevent harmful effects on both environment and human health.
- 3.1.7 Modern incineration plants must ensure pollution control is a priority; emissions must comply with the requirements of the Waste Incineration Directive. It is important to recognise that this directive supports cleaner technologies and reducing the impacts of incineration facilities on environment and human health.

### Circular Economy Action Plan

- 3.1.8 The European Union (EU) is currently considering an action plan for the Circular Economy, which includes proposals to increase the existing recycling target for household waste to 65% by 2030. Discussions are ongoing with EU Member States to finalise the package of proposals due to be adopted by the European Union to update existing waste and recycling legislation.

## 3.2 National Policy and Legislation

### The Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012

- 3.2.1 The system of development plans, introduced by the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011), requires the Local Planning Authority to prepare a 'local plan' which is made up of Development Plan Documents (DPDs).
- 3.2.2 Local Planning Authorities must set out a programme for the preparation of DPDs in a 'Local Development Scheme' and detail how communities and stakeholders will be involved in the preparation of DPDs in a 'Statement of Community Involvement'. More information is provided below. This legislation also requires all local planning authorities to carry out a Sustainability Appraisal during the preparation of the local plan.

- 3.2.3 The Town and Country Planning Regulations 2012 prescribe the form and content of the Local Plan documents and the Policies Map. These regulations also set out the process for preparing and adopting a local plan.

#### The Localism Act 2011

- 3.2.4 The Localism Act 2011 provided legislative powers to abolish regional spatial strategies. The abolition of the majority of policies in the South East Plan in March 2013 has resulted in the removal of regionally-derived targets (e.g. diversion from landfill, recycling and composting, and provision for accepting London's waste), which have not been replaced.
- 3.2.5 The Localism Act 2011 also introduced the Duty to Cooperate (DtC). The DtC places a legal duty on local planning authorities, county councils and public bodies to engage constructively to maximise the effectiveness of local plan preparation. As the WPA, Surrey County Council must demonstrate how it has complied with the DtC at the examination of its local plan.

#### The Waste (England and Wales) Regulations 2011

- 3.2.6 The Waste (England and Wales) Regulations (the Waste Regulations) came into force on the 1 October 2012. From the 1 January 2015, the Waste Regulations require waste collection authorities (WCAs) to ensure that appropriate recycling standards can be met through commingling, or through source segregated collections. This can impact the amount of waste and the quality of waste collected and the overall rate of recycling.

#### National Planning Policy Framework (NPPF) 2012

- 3.2.7 In 2012 the Government replaced the many of the former national planning policy guidance notes and statements and Government Circulars with a single document, the National Planning Policy Framework (NPPF). The NPPF is supported by the national Planning Practice Guidance (PPG), published in March 2014. The PPG replaced guidance notes that previously supported the former national planning policy guidance notes and statements.
- 3.2.8 The NPPF provides guidance for the preparation of local plans and encourages local plans to be kept up-to-date. This includes an expectation that LPAs 'positively seek opportunities to meet the development needs of their area'. The NPPF highlights the need for waste management facilities to be provided as strategic infrastructure.

### National Planning Policy for Waste (NPPW) 2014

- 3.2.9 The National Planning Policy for Waste (NPPW) 2014 replaced Planning Policy Statement 10<sup>8</sup> and sits alongside the NPPF. The NPPW sets out the government's ambition to work towards a more sustainable approach for resource management and use. This policy aims to ensure any waste management facilities are a positive contribution to communities and to balance the need for waste management facilities with the interests of the community.

### Waste Management Plan for England 2013

- 3.2.10 The Government published a national Waste Management Plan for England in December 2013. The plan brought together a number of policies under the umbrella of one national plan. It looks to encourage a more sustainable and efficient approach to resource management. It outlines the policies that are in place to help move towards the goal of a zero waste economy in the UK.
- 3.2.11 The Waste Management Plan for England provides an overview of the management of all waste streams in England and evaluates how it will support implementation of the objectives and provisions of the revised WFD.

## 3.3 Local Policy

### Surrey Waste Plan 2008

- 3.3.1 The Surrey Waste Plan (SWP) sets out the planning framework for the development of waste management facilities in Surrey. The current SWP was adopted in 2008.

### Surrey Minerals Plan 2011

- 3.3.2 The Surrey Minerals Plan Core Strategy Development Plan Document (DPD) forms part of the Surrey Minerals Plan and provides strategic policies and site specific proposals for the extraction of silica sand and clay for the period to 2026. The Surrey Minerals Plan Core Strategy DPD is supplemented by two development plan documents, the Surrey Minerals Plan Primary Aggregates DPD and the Aggregates Recycling Joint DPD.

### Aggregates Recycling Joint Development Plan Document 2013

- 3.3.3 The Aggregates Recycling Joint DPD (ARJDPD) supports both the Surrey Minerals and Waste DPDs. It sets out proposals with regard to the provision of aggregates recycling facilities across Surrey for the period to 2026.

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<sup>8</sup> PPS10: Planning for Sustainable Waste Management July 2005 and March 2011 update

### Statement of Community Involvement

- 3.3.4 Surrey County Council wants communities to be able to have a say in the planning decisions that shape Surrey's future. The Statement of Community Involvement (SCI) explains how Surrey will consult and involve the public when preparing planning policies and determining planning applications. The current SCI was adopted in May 2015.
- 3.3.5 The SCI sets out the stages of developing planning policy documents i.e. the new SWLP and how Surrey County Council will involve the community at each stage. As described in the SCI, Surrey County Council will publish a summary of the results of consultations on our website and show how Surrey County Council have considered them in the preparation of the new SWLP.

### Minerals and Waste Development Scheme

- 3.3.6 Under the requirements for the Planning and Compulsory Purchase Act 2004, Surrey County Council is required to have a local development scheme. This is a public statement identifying which local development documents will be produced. The Surrey Minerals and Waste Development Scheme includes a programme for the preparation of a new SWLP. The scheme and SCI are available to view on the Council's website<sup>9</sup>.

### Joint Municipal Waste Management Strategy

- 3.3.7 The most recent Joint Municipal Waste Management Strategy (JMWMS) was adopted in 2015. The JMWMS focuses on the management of local authority collected waste, including; household waste from kerbside collections, household waste from community recycling centres, and other waste collected by the authority such as school waste and a small proportion of commercial and industrial waste.
- 3.3.8 Implementation of the JMWMS is the responsibility of Surrey County Council in its role as the waste disposal authority and district and borough councils in their role as the waste collection authorities. It is important that the new SWLP 2018 takes into account the needs and targets included in the JMWMS. The JMWMS is due to be reviewed in 2019/20.

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<sup>9</sup> <https://www.surreycc.gov.uk/environment-housing-and-planning/minerals-and-waste-policies-and-plans>

## 4 Waste Management Context

### 4.1 Main Types of Waste

- 4.1.1 Waste from households refers to all waste collected by Surrey County Council and the 11 districts and boroughs. The main component of this, approximately 86%, is household waste with the remainder coming from other activities such as street cleaning, parks and grounds, business and construction.
- 4.1.2 Commercial and Industrial (C&I) waste is waste arising from the business sector e.g. offices, shops, restaurants.
- 4.1.3 Construction, Demolition and Excavation (C, D & E) waste for the purposes of this document is defined as “waste materials, which arise from the construction or demolition of buildings and/or civil engineering infrastructure, including hard construction and demolition waste and excavation waste, whether segregated or mixed”<sup>10</sup>.
- 4.1.4 Hazardous waste is defined as waste which contains substances or has properties that might make it harmful to human health or the environment.
- 4.1.5 Waste from households and from businesses can often be managed at similar types of facility whereas C, D & E waste and hazardous wastes is usually managed at separate facilities.

### 4.2 Waste Arisings

- 4.2.1 A waste needs assessment has been prepared to inform the SWLP and has been published as part of its evidence base<sup>11</sup>. This document sets out the assumptions and calculations for estimating waste arisings in Surrey up until 2033. A summary of the estimated waste arisings for the plan period are shown in Table 1.

Table 1 Waste arising in Surrey throughout the plan period (tonnes)

	Waste from households	Commercial & Industrial waste	Construction, Demolition & Excavation waste
2018	598,000	945,000	1,972,000
2023	630,000	1,013,000	1,972,000
2028	662,000	1,085,000	1,972,000
2033	694,000	1,164,000	1,972,000

<sup>10</sup> Department for Communities and Local Government (DCLG): Survey of Arisings & Use of Construction & Demolition Waste as Aggregate in England: 2005

<sup>11</sup> Surrey Waste Local Plan, Waste Needs Assessment September 2017

- 4.2.2 The Waste Needs Assessment considers a range of other waste streams including: hazardous waste, agricultural waste, healthcare waste, nuclear and low level radioactive waste and mining waste. The amounts of these types of waste produced in Surrey were not sufficient to warrant specific provision in terms of site allocations and the policies in the SWLP will guide decisions on proposals for associated new management capacity.
- 4.2.3 The SWLP provides updated targets for the sustainable management of waste for the period to 2033 which reflect the Plan's Vision and Strategic Objectives. These targets determine what types of waste management will be needed in the future. The targets encourage the management of waste further up the waste hierarchy.
- 4.2.4 The targets which are proposed in the SWLP are:

Table 2 Targets for recycling and landfill of waste in Surrey

Waste from households	Commercial and Industrial waste	Construction, Demolition and Excavation Waste
70% of waste from households is prepared for re-use or is recycled	70% of C&I waste is prepared for re-use or is recycled	80% of C, D & E waste is recycled
No waste from households is landfilled	10% or less of C&I waste is sent to landfill	No C, D & E waste for disposal is landfilled <sup>12</sup>

- 4.2.5 A range of scenarios were modelled in the Waste Needs Assessment ranging from no change to the partial achievement of targets through to full achievement of targets. A summary of the range of targets which were considered for each scenario are outlined in Tables 3 and 4 below.

Table 3 Range of targets considered for recycling

	Waste from households	Commercial & Industrial waste	Construction, Demolition & Excavation waste
2018	48%	60%	60%
2023	48% - 56%	60% - 67%	60% - 67%
2028	48% - 63%	60% - 73%	60% - 73%
2033	48% - 71%	60% - 80%	60% - 80%

<sup>12</sup> Waste used for beneficial purposes (e.g. restoration of mineral workings) will still be supported

Table 4 Targets for diversion away from landfill

	Waste from households	Commercial & Industrial waste	Construction, Demolition & Excavation waste
2018	6%	20%	10%
2023	6% - 4%	20% - 15%	10% - 7%
2028	6% - 2%	20% - 10%	10% - 3%
2033	6% - 0%	20% - 5%	10% - 0%

4.2.6 The WPA will encourage proposals which seek to make provision for the achievement of the maximum recycling rates and rates for diversion away from landfill in order to support the achievement of the proposed targets.

### 4.3 Waste Management Capacity

4.3.1 The future capacity requirements for non-landfill waste management are summarised in Table 5. This takes account of capacity at current facilities and is adjusted where necessary to reflect time limited planning permissions.

Table 5 Future waste management capacity requirements in Surrey (tonnes per annum) for non-landfill waste management

Year	C&D Recycling	Recycling	Energy from Waste	Metal/ELV Facility	Composting	Other recovery
2018	1,533,000	1,827,000	55,000	51,000	66,000	158,000
2023	873,000	1,827,000	55,000	51,000	66,000	158,000
2028	693,000	1,827,000	55,000	51,000	66,000	158,000
2033	589,000	1,827,000	55,000	51,000	66,000	158,000

4.3.2 The future capacity requirements for landfill are summarised in Table 6.

Table 6 Future requirements for landfill in Surrey (tonnes per annum)

Year	Inert landfill (Recovery to land)	Non-inert Landfill
2018	1,088,000	1,040,000
2023	718,000	592,000
2028	635,000	547,000
2033	635,000	0

#### 4.4 The Waste Management Capacity Gap

4.4.1 The 'capacity gap' is the difference between the total capacity of existing waste management facilities and the estimated quantity of waste that will be produced in future.

##### Non-landfill management facilities

4.4.2 The estimated capacity gaps for different types of non-landfill waste management facilities are shown in Table 6. The capacity gaps are shown as a range as they were based on different scenarios used to determine the amount of waste likely to be generated in Surrey as well as different targets for recycling and for diversion rates from landfill (see Tables 2 & 3 above). A negative value shows a lack of capacity in Surrey to manage the equivalent amount of waste arising.

Table 7 Waste management capacity gaps in Surrey (tonnes per annum) for non-landfill waste management

Year	C, D & E Recycling	Recycling	Energy Recovery	Metal/ELV Facility	Composting	Other recovery
2018	843,000	625,000	-239,000	32,000	-61,000	-67,000
2023	-47,000	570,000	-252,000	31,000	-78,000	-82,000
	to 84,000	to 676,000	to -221,000	to 31,000	to -68,000	to -61,000
2028	-457,000	499,000	-265,000	30,000	-96,000	-99,000
	to -194,000	to 725,000	to -199,000	to 30,000	to -75,000	to -54,000
2033	-791,000	409,000	-278,000	28,000	-115,000	-116,000
	to -397,000	to 769,000	to -174,000	to 28,000	to -83,000	to -44,000

4.4.3 Based on this assessment there is a need to encourage the development of the following types of facility:

- C, D & E waste recycling
- Energy Recovery
- Composting
- Other forms of recovery e.g. Anaerobic digestion.

### Landfill management facilities

4.4.4 The estimated capacity gap for both inert landfill and non-inert landfill is provided in Table 8.

Table 8 Waste management capacity gap in Surrey (tonnes per annum) for landfill

Year	Inert Landfill (Recovery to land)	Non-inert Landfill
2018	496,000	618,000
2023	61,000	220,000
	to 193,000	to 283,000
2028	-88,000	225,000
	to 175,000	to 360,000
2033	-154,000	-274,000
	to 240,000	to -58,000

4.4.5 Approximately 6,000,000 tonnes of additional inert landfill and/or recovery to land capacity is likely to come forward during the plan period as a result of mineral development in preferred areas identified in the SMP 2011.

4.4.6 While a small gap in landfill capacity is estimated at the end of the Plan period, the Plan does not allocate further capacity for landfill as a landfill to meet such a quantity would not be viable and such an allocation would therefore not be deliverable. Such an allocation would also not be consistent with the Plan's strategy of encouraging waste management further up the waste hierarchy. In the event that a proposal for additional landfill capacity did come forward this would be considered on its merits against the policies of this Plan (in particular Policy 6).

### 4.5 Delivery of Waste Management Capacity in Surrey

4.5.1 Evidence from monitoring of historic delivery of waste management infrastructure in Surrey suggests that the largest proportion (67%) of additional capacity was provided by new facilities developed on allocated sites. A proportion of additional capacity (16%) was also provided by new facilities on unallocated sites. The intensification and enhancement of sites in existing waste use also accounts for some 15% of additional capacity.

4.5.2 Additional capacity on unallocated land already in industrial or employment use accounts for only for an additional 4% capacity. This is likely to be a result of the difficulty of waste uses competing with higher value generating uses within industrial locations and also the particular operational needs of waste facilities that often require large areas of open storage which are not generally available on modern industrial estates.

Table 9 Historical delivery of Waste management capacity in Surrey (2008 to 2017)

Location	Additional Operational Capacity	Percentage
Allocated sites	593,100	67%
Unallocated sites	138,800	16%
Sites in existing waste use	133,640	15%
Industrial land	23,440	3%
Total	888,980	100%

4.5.3 With regards to the provision of C, D & E waste recycling capacity, temporary facilities at temporary mineral workings (i.e. while quarries are being worked and restored) are important for meeting the needs for this type of waste management. Approximately 969,000 tonnes of temporary capacity was delivered between 2008 and 2017. Hence the SWLP is generally supportive of C, D & E recycling in conjunction with operational mineral workings.

#### 4.6 Allocation of land for new waste management facilities

4.6.1 For recycling and/or recovery it is estimated that between 6 and 11 new waste management facilities will be needed. The amount of land needed to accommodate these sites is estimated to fall within the range of 13 to 20 hectares (ha). This is set out in Table 10.

Table 10 Land required to meet the identified need for new waste management infrastructure in Surrey by 2033

Waste Type	Need	Scenario <sup>13</sup>	
		Current	High
C&D Recycling	Requirement (ha)	31.6	15.9
	No. sites	17.0	9.0
Recycling	Requirement (ha)	-	-
	No. sites	-	-
Energy Recovery	Requirement (ha)	11.1	7.0
	No. sites	6.0	3.0
Metal/ELV Facility	Requirement (ha)	-	-
	No. sites	-	-
Composting	Requirement (ha)	6.9	5.0
	No. sites	2.0	2.0
Other recovery	Requirement (ha)	1.7	0.7
	No. sites	3.0	1.0
Land required (not including C&D Recycling)		19.8	12.6
No. sites needed (not including C&D Recycling)		11.0	6.0

4.6.2 No allocations are proposed for new landfill sites, however the SWLP will be flexible to allow for extensions to existing sites or potential new sites that are unallocated to come forward should there be need and should the sites meet the policies in the SWLP including any related to environmental impact.

4.6.3 No allocations are proposed for C, D & E recycling facilities. This is because historically those facilities have come forward as temporary facilities in line with operational mineral workings. The WPA believes that this is likely to continue.

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<sup>13</sup> Based on scenarios in the Waste Needs Assessment (September 2017) for recycling rates and diversion rates from landfill. A current scenario assumes no improvement in recycling and diversion rates from landfill. The high scenario assumes that all targets for recycling and diversion rates from landfill are achieved by 2033.

## 5 Vision

### 5.1 Introduction

- 5.1.1 The vision and strategic objectives provide an overarching ‘direction of travel’ for the SWLP. Together they set out what the SWLP aims to achieve over the plan period. The vision and strategic objectives for the SWLP relate only to issues of waste development and need to be read in the context of the whole development framework.
- 5.1.2 The spatial strategy articulates the locational implications of the vision and strategic objectives by describing, in broad terms, where waste related development, that is consistent with the vision and strategic objectives, would take place.

### 5.2 Vision

- 5.2.1 The vision sets out a broad picture of how waste will be managed during and by the end of the plan period, while the strategic objectives outline how the Vision will be achieved. The Vision for waste development in Surrey is:

To enable sufficient waste management capacity to support Surrey's nationally important economy.

To encourage residents and businesses to produce less waste and re-use, recycle and recover more waste.

To recognise the value of Surrey's environment and maintain the high standards of wellbeing enjoyed by our residents when permitting waste facilities.

- 5.2.2 The vision can be distilled down to five key elements based on national planning policy legislation:
- Net self-sufficiency
  - Sustainable Waste Management (Waste Hierarchy)
  - Resident wellbeing
  - Environmental protection
  - Sustainable Development

## 6 Strategic Objectives

### 6.1 Net self-sufficiency

**Strategic Objective 1: To make sure enough waste management capacity is provided to manage the equivalent amount of waste produced in Surrey.**

6.1.1 Under national policy the WPA is required to identify sufficient opportunities to meet the identified needs of its area for the delivery of waste management infrastructure<sup>14</sup>. The principle of net self-sufficiency means that Surrey should provide enough waste management facilities to manage the equivalent amount of waste arising within the county.

6.1.2 The policy which will implement Strategic Objective 1 is:

- Policy 1 – Need for Non-landfill Waste Development

6.1.3 Evidence which supports the policy:

- Waste Needs Assessment (September 2017)
- Preferred Options Report for Draft Policies (September 2017)

6.1.4 How the policy contributes to sustainable development:

- Policy 1 supports the application of the waste hierarchy in identifying the amount and type of facilities required and encouraging waste to be managed in the most sustainable way starting with prevention, followed by reuse, recycling and recovery. Disposal is seen as an option of last resort.
- The policy contributes to sustainable development by ensuring that the need for waste management facilities to support growth and development needs identified by Districts and Borough councils<sup>15</sup> as part of their infrastructure requirements are identified and addressed.

6.1.5 How policies will implement Strategic Objective 1:

- Policy 1 recognises that there is a need for certain types of waste management facilities in Surrey which the SWLP should seek to deliver. The policy recognises that this need may change and that annual reporting would provide up to date information on the need for waste management facilities in Surrey.
- In granting planning permission this policy should be taken into account to determine if there is a need for the proposal or not. Those proposals which meet the needs of the county would be supported.

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<sup>14</sup> National Planning Policy for Waste Paragraph 3

<sup>15</sup> Through the preparation of the Interim Surrey Local Strategic Statement (LSS) and individual District and Borough Infrastructure Delivery Plans

## 6.2 Sustainable Waste Management (Waste Hierarchy)

**Strategic Objective 2: To encourage development which supports sustainable waste management at least in line with national targets for recycling, recovery and composting.**

- 6.2.1 It is important to note that national policy<sup>16</sup> states that in preparing Local Plans, waste planning authorities should drive waste management up the waste hierarchy. This means encouraging prevention of waste, preparing for re-use, recycling and recovery of waste. This includes recovery of inert waste to land.
- 6.2.2 Targets for recycling, recovery and composting are set out at an EU level in the WFD (2008/98/EC), the European Commission Circular Economy Package. At the national level targets are referred to in the Waste Management Plan for England. Local targets include those in the JMWMS. The draft version of the SWLP has calculated the need for waste infrastructure using targets which are the same or more ambitious than those above.
- 6.2.3 The policies which will implement Strategic Objective 2 are:
- Policy 2 – Recycling and Recovery Operations
  - Policy 3 – Operations for Recycling of Construction, Demolition and Excavation Waste
  - Policy 4 – Sustainable Construction and Waste in New Development
  - Policy 5 – Recovery of Inert Waste to Land
- 6.2.4 Evidence which supports the policies:
- Waste Needs Assessment (September 2017)
  - Preferred Options Report for Draft Policies (September 2017)
  - The adopted Surrey Aggregate Recycling Joint Development Plan Document 2013
- 6.2.5 How the policies contribute to sustainable development:
- These policies contribute to sustainable development by helping to minimise waste and pollution by encouraging sustainable waste management in line with the waste hierarchy.
- 6.2.6 How policies will implement Strategic Objective 2:
- These policies will encourage certain types of development in order to provide enough waste management facilities to meet relevant targets for sustainable waste management as identified in line with Policy 1 – Need for Non-landfill Waste Development.

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<sup>16</sup> National Planning Policy for Waste Paragraph 3

Strategic Objective 3: To manage disposal of waste to land as an option of last resort, but one that is important for managing residual waste that cannot be treated in any other way.

- 6.2.7 The waste hierarchy sees disposal as the least preferred option for waste management and an option of last resort. However, it remains a necessary option for certain types of waste that cannot be practically disposed of in any other way.
- 6.2.8 The policy that will implement Strategic Objective 3 is:
- Policy 6 – Disposal of Non-inert Waste to Land
- 6.2.9 Evidence which supports the policy:
- Waste Needs Assessment (September 2017)
  - Preferred Options Report for Draft Policies (September 2017)
- 6.2.10 How the policy contributes to sustainable development:
- This policy contributes to sustainable development by helping to minimise waste and pollution by encouraging sustainable waste management in line with the waste hierarchy.
- 6.2.11 How the policy will implement Strategic Objective 3:
- This policy will ensure that landfill is provided only for waste which cannot be practically reused, recycled or recovered and is not unnecessarily sent for disposal. This policy also recognises that extensions of time to landfill may be needed as inputs of material change. Finally, this policy also sets out requirements for site restoration and aftercare to ensure that benefits from the development can be realised.

### 6.3 Safeguarding existing waste infrastructure

**Strategic Objective 4: To retain and make best use of existing sites for waste development through safeguarding against non-waste development and supporting improvement of facilities.**

6.3.1 Within Surrey there is strong competition for available land for housing, employment and waste development. In order to address this challenge the waste local plan needs to make best use of the suitable land that can be identified in order to meet the need for waste facilities. It can do this by safeguarding land necessary for waste management facilities and encouraging efficient use of land currently in use for waste management.

6.3.2 The policies which will implement Strategic Objective 4 are:

- Policy 7 – Safeguarding
- Policy 8 – Improvement or extension of existing facilities

6.3.3 Evidence which supports the policy:

- Delivery of Waste Management Capacity in Surrey 2008 – 2017 (September 2017).

6.3.4 How the policies contribute to sustainable development:

- The policies contribute to sustainable development by ensuring that sufficient land is available for waste management facilities to support economic growth through safeguarding of sites for development of waste management facilities.

6.3.5 How policies will implement Strategic Objective 4:

- This policy will seek to ensure that land is used in the most effective way to deliver waste management capacity by ensuring that land currently used for waste management is retained and not lost to alternative forms of development and that operators are encouraged to manage sites in the best way possible without significant adverse impacts to the community or the environment.

## 6.4 Location of new waste infrastructure

**Strategic Objective 5: To direct new facilities to locations that have been identified as suitable for waste development.**

- 6.4.1 One of the reasons Surrey is an attractive place to live and work is its high quality environment which includes a number of significant designations. By making sure that development of waste management facilities is located in the best locations the WPA aims to minimise significant adverse impacts on the environment.
- 6.4.2 In identifying new sites for waste management facilities, the WPA will meet the national requirement<sup>17</sup> to identify sites for new or improved waste management facilities in appropriate locations.
- 6.4.3 The policies which will implement Strategic Objective 5 are:
- Policy 9 – Green Belt
  - Policy 10 – Strategic Waste Site Allocations
  - Policy 11 – Other areas suitable for development of waste management facilities
  - Policy 12 – Wastewater Treatment Works
- 6.4.4 Evidence which supports the policy:
- Site Identification & Evaluation Report (September 2017)
  - Evidence provided by the Wastewater Industry.
- 6.4.5 How the policies contribute to sustainable development:
- These policies contributes to sustainable development by ensuring that sufficient land is available in appropriate locations for waste management facilities to support growth.
- 6.4.6 How policies will implement Strategic Objective 5:
- These policies will seek to ensure that enough land is available for waste management infrastructure to support planned growth in Surrey. These policies will encourage waste related development to take place in the best available locations.

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<sup>17</sup> National Planning Policy for Waste Paragraph 4

## 6.5 Environment and Amenity

**Strategic Objective 6: To encourage innovation and best practice which provide opportunities to minimise the impact of waste development on communities and the environment.**

- 6.5.1 It is essential that the SWLP addresses all aspects of sustainable development – including the protection and enhancement of the environment. It is envisaged that this will be achieved through the development of waste management facilities in appropriate locations and with an emphasis on good design which will protect and enhance the environment. Those developments which use cleaner technologies or limit vehicle emissions through sustainable transport or minimal movements by road will also be supported.
- 6.5.2 Planning Practice Guidance recognises that the siting of waste management facilities will be influenced by physical and environmental constraints<sup>18</sup>. In Surrey, environmental protection was highlighted as a key issue for communities through the Issues and Options Consultation.
- 6.5.3 The policies which will implement Strategic Objective 6 are:
- Policy 13 – Sustainable Design
  - Policy 14 – Development Management
- 6.5.4 Evidence which supports the policy:
- Surrey Planning Service Annual Monitoring Report.
- 6.5.5 How the policies contributes to sustainable development:
- These policies contribute to sustainable development by helping to minimise waste and pollution at all stages of development. Policies for development management which seek to ensure that there are no significant adverse impacts from new or improved development and that this can contribute to protecting and enhancing the natural, built and historic environment.
  - These policies will also support development which can adapt to climate change by reducing emissions or through encouraging or implementing low carbon technologies.
- 6.5.6 How policies will implement Strategic Objective 6:
- These policies will seek to ensure that waste management facilities in Surrey are of a high quality and that they do not result in significant adverse impacts to communities and the environment.

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<sup>18</sup> Planning Practice Guidance for waste Paragraph 037 Reference ID 28-037-20141016

## 6.6 Sustainable Transport

**Strategic Objective 7: To keep waste movement by road to minimum practicable levels and support options for sustainable transport.**

- 6.6.1 Strategic Objective 7 seeks to encourage sustainable transport where available but also recognises that this is not always practicable. In Surrey there are only limited possibilities for means of transport other than road. Therefore, in the local context, there is a need for sustainable transport policies to address impacts on roads for example by seeking to minimise road movements.
- 6.6.2 The policy that will implement Strategic Objective 7 is:
- Policy 15 – Transport and Connectivity
- 6.6.3 Evidence which supports the policy:
- Surrey Local Transport Plan (January 2017)
  - Site Identification & Evaluation Report (September 2017)
- 6.6.4 How the policy contributes to sustainable development:
- By seeking to minimise road movements and encourage options for sustainable transport the policy supports sustainable development and acknowledges the role sustainable transport plays in contributing to wider sustainability objectives including environmental objectives.
- 6.6.5 How the policy will implement Strategic Objective 7:
- This policy will encourage sustainable transport and seek to minimise movements by road.

## 6.7 Engagement

**Strategic Objective 8: To work closely with our partners such as Surrey Waste Partnership, District and Borough councils and other Waste Planning Authorities to deliver the Surrey Waste Local Plan.**

- 6.7.1 The county council recognises that the Vision and Strategic Objectives can only be realised through working with a range of partners including: the Surrey Waste Partnership, district and borough planning teams, the waste industry, elected officials and residents.
- 6.7.2 To implement the SWLP the county council will work with its partners to support initiatives that help meet local targets for prevention and re-use, recycling and recovery and prioritise development of facilities which allow management of waste further up the waste hierarchy.
- 6.7.3 To work collaboratively with other WPAs, particularly those in in the South East of England and adjoining Surrey to ensure that provision of strategic capacity is co-ordinated as far as possible.
- 6.7.4 The policy that will implement Strategic Objective 8 is:
- Policy 16 – Community Engagement
- 6.7.5 Evidence which supports the policy:
- Adopted Statement of Community Involvement (2015)
  - Local List for the validation of County planning applications (Draft 2017)
- 6.7.6 How the policy contributes to sustainable development:
- As part of delivering sustainable development partnership working is considered essential to provide accessible local services that reflect the community's needs. As an example, waste development needs to be considered alongside housing and employment site which means working with Districts and Boroughs who are the planning authorities for these issues.
- 6.7.7 How the policy will implement Strategic Objective 8:
- The Duty to Cooperate (DtC) is already a legal requirement but this section of the Plan will outline how the county council will continue to engage with those prescribed bodies and how the county council will continue to engage in accordance with the DtC.
  - Policy 16 will require an appropriate level of community engagement to be undertaken for waste management proposals prior to submitting an application. This will help ensure that communities are engaged in the planning process.
  - Under this policy it is also essential that early discussions with communities are undertaken, prior to a planning application being submitted to the county council to ensure that these communities are involved in decision making.

## 7 Spatial Strategy

### 7.1 Introduction

7.1.1 The Spatial Strategy helps deliver the Strategic Objectives in terms of guiding the form and location of waste development. This strategy was developed from the Preferred Options<sup>19</sup> identified following the consultation on Issues and Options and from several key 'building blocks'. Namely:

- Provision of waste capacity in Surrey; the spatial strategy seeks to ensure net self-sufficiency. This means providing sufficient waste management infrastructure to deal with the equivalent amount of waste arising in Surrey.
- Managing some waste from London and other surrounding counties; net self-sufficiency accepts that it is not practicable to deal only with waste produced in Surrey and that cross-boundary waste movements<sup>20</sup>, including those from London, will be necessary to support the viability and efficient operation of waste management facilities.
- Scale of facilities; the spatial strategy recognises the need for a mix of facilities of different sizes/scales to address the capacity gap for waste management facilities in Surrey. This includes some large facilities which provide an important contribution to the overall capacity, as well as a range of small and medium facilities which can address specific needs and may be more acceptable in certain locations.
- Types of facilities; the spatial strategy supports flexibility with sites and areas allocated for a range of different treatment types rather than a single use. This recognises that waste markets and the need for waste management facilities may change over time. This also recognises that new technologies may come forward during the plan period and that flexibility will not restrict the use of new technologies, particularly where these could provide benefits through reduced emissions or supplying heat or power.
- Green Belt; the spatial strategy will allow development within Green Belt where very special circumstances (VSC) can be demonstrated. VSC could include a lack of alternative sites outside of the Green Belt. Any site in the Green Belt will need to demonstrate VSC.
- Key centres and areas of growth; the spatial strategy addresses the polycentric nature of Surrey's settlements by including a mix of locations. The nature of these settlements mean that there is no one major source of waste arisings. Therefore, it may be more important that facilities are well connected by good transport links rather than being located in geographic

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<sup>19</sup> Separate documents relating to the Issues and Options and setting out how the Preferred Options were identified have been published alongside this draft Plan and are available on the following website: [www.surreycc.gov.uk/newwasteplan](http://www.surreycc.gov.uk/newwasteplan).

<sup>20</sup> This includes movements both into and out of Surrey

proximity to key centres. This supports the need for a 'network' of connected sites to enable efficient management of waste.

- Previously Developed Land (PDL) and greenfield land; the spatial strategy should seek to avoid waste development on greenfield land. Development on greenfield land should only be considered where there are sufficient alternative options cannot be found. This is in line with national policy which supports the preferential location of development on PDL.
- Transport and Connectivity; in order to minimise impacts on local communities and the environment the spatial strategy should encourage facilities to be well connected to the main transport network. This should also be supported by options for sustainable transport which minimise movement of waste by road.

### Spatial Strategy

Land will be allocated to provide for a suitable number of facilities with the aim of ensuring that these sites are in the best available locations and are large enough to make a significant contribution to development of the necessary built infrastructure and associated development.

Surrey has a need for additional waste management capacity which will be found through the identification and allocation of suitable sites for strategic waste use. It is also recognised that some capacity may be met through unallocated sites which are considered acceptable for waste management development on a case-by-case basis and redevelopment of existing waste facilities.

Waste management development will be prioritised on previously developed land (PDL). PDL may include sites and areas identified for employment uses, industrial and storage purposes, redundant agricultural and forestry buildings and their curtilages. Suitable sites in existing waste management use will be encouraged where improvement and diversification would lead to an increase in appropriate management capacity.

At the same time, waste management development for new or improved facilities should seek to minimise impact on the environment and amenity. This starts with waste management developments being in the best possible locations but also recognises that developments should be sensitively designed to their environment.

Sustainable transport options in Surrey are limited, however, through the delivery of new or improved waste management facilities a network of sustainable facilities will be encouraged. This should include sites which are well-connected to sources of waste, such as main centres of population and employment by road or rail.

By encouraging a network of waste management facilities which are well-connected to sources of waste movements of vehicles, especially heavy goods vehicles (HGVs), the county council is seeking to avoid significant adverse impacts from vehicles on residents.

## 7.2 Site Selection

- 7.2.1 To help meet the waste management capacity gap, sites suitable for the development of additional waste management capacity are proposed for allocation in the SWLP. The Spatial Strategy has been used to identify these sites. Details of the proposed sites are set out in Appendix A of this Plan.
- 7.2.2 The process by which areas of land that might be appropriately allocated for future waste development through the emerging SWLP involved the following main stages<sup>21</sup>:
- Stage 1 – Identification of a ‘long list’ of potential sites, drawing on information from a range of sources.
  - Stage 2 – Collection of baseline information about each of the sites on the ‘long list’.
  - Stage 3 – Elimination of sites from further consideration through the application of a series of preliminary sieves.
  - Stage 4 – Evaluation of the remaining sites against a further suite of sieves.
  - Stage 5 – Identification of possible options for the allocation of land and testing of a number of different scenarios in order to provide sufficient land to accommodate the anticipated additional waste management capacity required.
- 7.2.3 As a result of the scenario testing it is evident that unless Green Belt and some greenfield land is used there will be insufficient land to meet the additional waste management capacity requirements. In each case particular site circumstances are considered to justify the site allocations.

## 8 Policies

### 8.1 Need for Waste Management Facilities in Surrey

- 8.1.1 The following policies implement **Strategic Objective 1**: To make sure enough waste management capacity is provided to manage the equivalent amount of waste produced in Surrey.

#### Capacity Gap

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<sup>21</sup> For a full description of the methodology used to identify potential sites see: Site Identification & Evaluation Report September 2017

- 8.1.2 The WFD requires that waste planning authorities need to plan for enough waste management infrastructure to handle waste arisings within their plan area. The waste hierarchy also implies that landfill is the least preferable method of waste management. The NPPW requires the WPA to identify sufficient opportunities to meet the identified needs of their area for the management of waste streams in preparing the local plan.
- 8.1.3 It is estimated that by the end of the plan period there will be shortfall of capacity of facilities for recycling of C, D & E waste, composting, and other recovery including anaerobic digestion (AD) and energy recovery (Table 6).
- 8.1.4 As new waste management capacity is developed the capacity gap will change and this will be monitored in the Annual Monitoring Report (AMR). The need for facilities should be assessed against the results of monitoring in the latest AMR.

#### Need for Waste Management Facilities

- 8.1.5 Surrey's aim is to be net self-sufficient, that is, the county has enough waste management capacity to deal with the equivalent amount of waste which arises in the county. This means that Surrey should plan to provide sufficient capacity to adequately manage forecast needs as a minimum.
- 8.1.6 Waste development which supports the sustainable management of waste, including through maximising opportunities for preparing for re-use, recycling and recovery, will contribute to achieving sustainable development by making best use of natural resources.
- 8.1.7 While the WPA acknowledges a need for recovery capacity, it seeks to promote recycling capacity ahead of the need for recovery capacity. Recycling sits above recovery on the waste hierarchy and this approach is therefore consistent with the directive and the vision for the draft SWLP.
- 8.1.8 Proposals for the development of waste management facilities must also comply with other policies in this plan including any policies related to location and environmental protection.

#### Policy 1 – Need for Non-landfill Waste Development

Planning permission for the development of new non-landfill waste facilities will be granted where it can be demonstrated that:

- i) The proposed development will contribute to achieving targets for recycling, recovery and the diversion of waste away from landfill in a manner that does not prevent management of waste at the highest point practical in the waste hierarchy; and
- ii) Proposals for waste recovery capacity will not result in the requirements for such capacity, as specified in the latest Annual Monitoring Report, to be exceeded.

Table 11 Monitoring for Policy 1 – Need for Waste Development

Measure/Indicator	<ul style="list-style-type: none"> <li>• Additional capacity (tonnes per annum) granted through new waste planning permissions</li> </ul>
Data Source(s)	<ul style="list-style-type: none"> <li>• Planning Applications and Decisions</li> <li>• Appeal Decisions</li> <li>• Survey responses from operators</li> </ul>
Key Organisation(s)	<ul style="list-style-type: none"> <li>• Waste Planning Authority</li> <li>• Waste Industry</li> </ul>
Target(s)	<ul style="list-style-type: none"> <li>• Capacity is at least equal to the waste generated (net self-sufficiency).</li> </ul>
Trigger	<ul style="list-style-type: none"> <li>• Waste capacity is more than 20% below arisings.</li> </ul>

## 8.2 Sustainable Waste Management

- 8.2.1 The following policy implements **Strategic Objective 2**: To encourage development which supports sustainable waste management in line with national targets for recycling, recovery and composting and **Strategic Objective 3**: To manage landfill as an option of last resort, but one that is important for managing residual waste that cannot be treated in any other way.

### Prevention

- 8.2.2 A resource efficient economy is one where fewer resources are used to produce more, making the most of those resources by keeping them in use for as long as possible, extracting the maximum value from them whilst in use, then recovering and regenerating products and materials at the end of each service life. This includes by preventing waste being generated in the first place.
- 8.2.3 Preventing waste from being generated in the first place is at the top of the waste hierarchy. Opportunities for waste prevention occur throughout a product life-cycle and include actions such as:
- Designing out, or minimising, waste by reducing packaging;
  - Changing business practices so less waste is produced;
  - Improving design to optimise the lifespan of products and components and to enable more repair, remanufacture, re-use and recycling;
  - Using different business models such as take-back, leasing and producer responsibility schemes.
- 8.2.4 These actions require the Waste Planning Authority, WDA and WCA to work together with their partners through promoting waste prevention, education and awareness initiatives.

### Recycling and Recovery

- 8.2.5 Following the waste hierarchy, waste management capacity which maximises options for re-use, recycling, and recovery, in turn, is the next most sustainable. Recycling, recovery and processing facilities cover a wide range of technology types that might include materials recovery facility, mechanical biological treatment plant, autoclave or in-vessel composting plant and energy from waste technologies. This list is not exhaustive of the current technologies available and the policy is not technology specific so that the SWLP is able to react to new technologies that may be developed in the future.
- 8.2.6 Generally the county council is supportive of recycling and recovery operations where it can be demonstrated that facilities will not have adverse effects of amenity or environment. The types of waste technology that will be suitable will depend on the nature and scale of the proposed scheme and the characteristics of the site and its surroundings.

- 8.2.7 New recovery technologies (e.g. energy from waste) will particularly suit locations that have access to gas, electricity and freight networks. However, small-scale anaerobic digestion, C, D & E waste recycling facilities and windrow composting plants may be more suited to rural or semi-rural settings (e.g. existing farms) and are normally not compatible with hi-tech office or business parks. Application of the development management policies in Section 8.9 will determine suitability.
- 8.2.8 C, D & E waste recycling operations are often located in the open and associated with other activity such as mineral working and so a separate policy is applied to such operations (Policy 3). Applications for the enhancement or extension of existing recycling or recovery operations should also be dealt with under Policy 8.

#### Community Recycling Centres

- 8.2.9 Community Recycling Centres (CRCs) are sites that are operated by the Waste Disposal Authority (Surrey County Council) for local residents to drop off their household waste, recyclables and bulky waste. Surrey has 15 CRC sites which manage over 140,000 tonnes of material per year<sup>22</sup>. In 2015/16, 56% of the materials collected at the CRCs were recycled. When materials which are sent for energy recovery or other beneficial use are included the total diversion rate from landfill is 94%<sup>23</sup> for all waste collected at kerbside and at the CRC.
- 8.2.10 Policy 2 below should apply to any development associated with a CRC including any commercial development related to the CRC and achieving the wider aims of promoting sustainable waste management and the waste hierarchy. This policy should also apply to depots, workshops and other development ancillary to the CRC which help the site to function efficiently e.g. fewer vehicle movements, better access and other benefits.

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<sup>22</sup> This service is currently subject to public consultation.

<sup>23</sup> Surrey Planning Service Annual Monitoring Report 2015/16.

### Policy 2 – New or Improved Recycling and Recovery Facilities

Planning permission for the development of new or improved recycling or recovery facilities (other than C,D & E recycling) and any associated development will be granted where:

- i) The site is allocated in the Surrey Waste Local Plan for waste development (Policy 10); or
- ii) The new operation involves the redevelopment of a site, or part of a site, in existing waste management use; or
- iii) The site is otherwise suitable for waste development when assessed against other policies in the SWLP.

Development of new or improved waste recycling and recovery operations co-located with other types of development will be supported where it can be demonstrated that there are benefits from the co-location which may include:

- i) More efficient production, in terms of quantity or quality, of recyclate and waste derived fuels;
- ii) Fewer lorry movements would be required as a result of co-location of waste development; or
- iii) An additional beneficial use is associated with waste recycling and recovery operations at the site e.g. contribution to energy network.

Table 12 Monitoring for Policy 2 – Recycling and Recovery Operations

Measure/Indicator	<ul style="list-style-type: none"> <li>• Waste arisings (tonnes) of waste from households</li> <li>• Waste arisings (tonnes) of C &amp; I waste</li> <li>• Amount/proportion of waste from households and C &amp; I waste recycled, recovered or composted (tonnes, %)</li> </ul>
Data Source(s)	<ul style="list-style-type: none"> <li>• Environment Agency Waste Data Interrogator</li> <li>• Other sources of data as indicated in the Annual Monitoring Report</li> </ul>
Key Organisation(s)	<ul style="list-style-type: none"> <li>• Waste Planning Authority</li> <li>• Waste Disposal Authority</li> <li>• Environment Agency</li> </ul>
Target(s)	<ul style="list-style-type: none"> <li>• 70% of waste from households is prepared for re-use or recycled by 2033</li> <li>• 70% of C&amp;I waste is prepared for re-use or recycled by 2033</li> </ul>
Trigger	<ul style="list-style-type: none"> <li>• Waste arisings and/or rates for preparing for re-use or recycling exceed waste forecasts or other information available suggests that the plan is unable to meet the demand for new or enhanced facilities</li> </ul>

### 8.3 Recycling of Construction, Demolition and Excavation Waste

- 8.3.1 C, D & E waste is defined as the range of materials which arise from the construction or demolition of buildings and civil engineering projects. Significant quantities of this waste arise in the county. The waste makes up over one third of the total controlled waste stream annually produced in Surrey. There is also C, D & E waste imported into the area, both from London and the South East.
- 8.3.2 C, D & E waste recycling may refer to the screening, processing, crushing, washing or other activities of a similar nature which produce materials such as recycled aggregates and soils for sale. These operations typically take place in the open which would lend this type of development to a more rural location, but some operations can be enclosed.
- 8.3.3 In Surrey, the recycled aggregates that can be used to substitute for land won aggregates are primarily recycled materials derived from C, D & E waste. Recycled aggregates include:
- Hard construction and demolition waste (segregated or mixed unprocessed / uncrushed materials which particularly include concrete, masonry, bricks, tiles and ceramics);
  - Excavation waste (naturally occurring stone, rock and similar materials which have been excavated as a result of site preparation activities); and
  - Bituminous materials (arising from road engineering works).
- 8.3.4 The Aggregate Recycling Joint Development Plan Document 2013 looks to increase the use of secondary and recycled materials as substitutes for natural minerals and consequently to reduce the amount of construction and demolition waste disposed of to landfill. The Aggregate Recycling Joint Development Plan Document 2013 identifies the types of sites that will contribute to the future provision of aggregate recycling, including:
- Existing permanent sites;
  - Existing temporary sites;
  - In-situ temporary recycling at excavation and demolition sites;
  - Potential new temporary and permanent sites; and
  - Windfall capacity including intensification and / or extensions to existing sites.
- 8.3.5 In order to support targets for aggregate recycling in the Surrey Minerals Plan 2011 and Aggregate Recycling Joint Development Plan Document 2013 the SWLP needs to encourage recycling of C, D & E waste. Policy 4 below sets out how proposals for managing C, D & E waste should be considered and this complements the policies in the Surrey Minerals Plan 2011 and Aggregate Recycling Joint Development Plan Document 2013.

- 8.3.6 It is recognised that a significant proportion of existing C, D & E waste recycling facilities are located on land associated with mineral workings. These facilities benefit from temporary permissions which are associated with the timescale for mineral extraction and site restoration. A key part of the policy approach is therefore to continue to encourage temporary C, D & E recycling operations on suitable land associated with operational mineral workings.
- 8.3.7 The approach within the SWLP is to encourage the sustainable management of waste in line with the waste hierarchy. As such, the SWLP promotes the recycling of inert material over the recovery of this material to land. Surrey County Council recognises the tension that may exist between supporting recycling of C, D & E waste and encouraging timely restoration, as ongoing recycling might slow down restoration.
- 8.3.8 Sites for C, D & E waste recycling should be located in locations easily accessible to where waste arises and facilities may be temporarily linked to a specific development e.g. mineral working or large construction project. These types of developments will be supported where it can be demonstrated that facilities will not have adverse effects of amenity or environment.

### Policy 3 – New or Improved Facilities for Recycling of Construction, Demolition and Excavation Waste

Planning permission for the development of new C, D & E waste recycling operations will be granted where:

- i) The site is allocated in the Surrey Waste Local Plan or Aggregates Recycling Joint Development Plan Document for waste development and is identified as potentially suitable for C, D & E waste recycling operations; or
- ii) The site is otherwise suitable for C, D & E waste recycling operations when assessed against policies in the Surrey Waste Local Plan and the Spatial Strategy; or
- iii) The site is a landfill or mineral workings where the duration of the proposed operations is tied to that of a landfill or mineral working or restoration scheme.

Development of new or improved C, D & E waste recycling operations located with other types of development will be supported where it can be demonstrated that there are benefits from the co-location which may include:

- iv) More efficient production, in terms of quantity or quality, of secondary and recycled aggregate; or
- v) Fewer lorry movements would be required as a result of co-location of waste development; or
- vi) An additional beneficial use is associated with C, D & E waste processing at the site e.g. restoration of mineral working, contribution to energy network.

Table 13 Monitoring for Policy 3 – Operations for Recycling of Construction, Demolition and Excavation Waste

Measure/Indicator	<ul style="list-style-type: none"> <li>• C, D &amp; E waste arisings (tonnes)</li> <li>• Amount of waste prepared for reuse or recycled (tonnes, %)</li> </ul>
Data Source(s)	<ul style="list-style-type: none"> <li>• Planning Applications and Decisions</li> <li>• Appeal Decisions</li> <li>• Survey responses from operators e.g. Recycled Aggregates</li> <li>• Environment Agency Waste Data Interrogator</li> <li>• Other sources of data as indicated in the Annual Monitoring Report</li> </ul>
Key Organisation(s)	<ul style="list-style-type: none"> <li>• Waste Planning Authority</li> <li>• Environment Agency (for information)</li> <li>• Waste Industry (for information)</li> </ul>
Target(s)	<ul style="list-style-type: none"> <li>• 80% of C,D&amp;E waste is recycled by 2033</li> </ul>
Trigger	<ul style="list-style-type: none"> <li>• Waste arisings and/or rates for preparing for re-use or recycling exceed waste forecasts or other information available suggests that the plan is unable to meet the demand for new or enhanced facilities</li> </ul>

### Sustainable Construction and Management of Waste at Development Sites

- 8.3.9 While districts and borough councils do not have the planning functions in respect of the preparation of Local Plans covering waste, or waste planning applications, they must have regard to the NPPW and are expected to help deliver the Waste Hierarchy. This includes through:
- Integrating local waste management opportunities in proposed new development
  - Promoting good management of waste from any proposed development, such as through encouraging on-site management of waste
  - Promoting sustainable construction practices through the use of recycled products, recovery of on-site material and the provision of facilities for the storage and regular collection of waste.
- 8.3.10 It is important that waste management issues are addressed in the design stage of new developments to make sure that waste arisings during the construction phase and operational phase can be managed sustainably.
- 8.3.11 Non-waste development is normally the responsibility of the borough or district council and some local plans and other planning guidance already seek to address in more detail issues of sustainable design and sustainable construction. Policy 4 does not seek to supersede any policies in adopted or emerging borough or district local plans.
- 8.3.12 New developments will always need to incorporate storage facilities that ensure the recycling of waste is maximised. There may also be occasions, particularly in larger developments, where small scale waste processing facilities can be incorporated, particularly where these can include heat recovery of benefit to the development itself.
- 8.3.13 Surrey County Council has produced a Consultation Protocol and a Sustainable Construction Standing Advice Note<sup>24</sup>. The protocol sets out how and when districts and boroughs should consult Surrey County Council and what the county council will do in response. The protocol and standing advice will be kept up to date to support the consultation process.
- 8.3.14 While the protocol provides a useful framework it is not a replacement for ongoing communication and collaboration between authorities and the process relies on the county council and the district and borough councils working together effectively. The county council will also need to consider the development against other relevant plans and policies when taking its final view.

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<sup>24</sup> <https://www.surreycc.gov.uk/environment-housing-and-planning/minerals-and-waste-policies-and-plans/minerals-and-waste-safeguarding>

- 8.3.15 The impacts of the processes of recycling or reusing construction, demolition and excavation material on site will need to be considered by the borough or district council when determining the acceptability of the non-waste development.

#### Policy 4 – Sustainable Construction and Waste Management in New Development

Planning permission for any major development<sup>25</sup> will be supported where it has been demonstrated that:

- i) The waste generated during construction, demolition and excavation phase of development is minimised; and
- ii) Opportunities for re-use and recycling of construction, demolition and excavation residues and waste on site are maximised; and
- iii) The incorporation of integrated storage for promoting waste recycling is provided; and
- iv) Facilities to manage the waste arising from the development of an appropriate type and scale have been considered as part of the development.

Table 14 Monitoring for Policy 4 – Sustainable Construction and Waste at Development Sites

Measure/Indicator	<ul style="list-style-type: none"> <li>• Consultation Protocol is kept up to date</li> </ul>
Data Source(s)	<ul style="list-style-type: none"> <li>• SCC Consultation Protocol</li> </ul>
Key Organisation(s)	<ul style="list-style-type: none"> <li>• Waste Planning Authority</li> <li>• Local District and Borough Planning Authority</li> <li>• Development Industry</li> </ul>
Target(s)	<ul style="list-style-type: none"> <li>• Consultation Protocol has been reviewed in the past 12 months</li> </ul>
Trigger	<ul style="list-style-type: none"> <li>• Consultation Protocol has not been reviewed in the past 24 months</li> </ul>

<sup>25</sup> Major development is as defined in the Town & Country Planning (Development Management Procedure) (England) Order 2015

## 8.4 Recovery of Inert Waste to Land

- 8.4.1 The beneficial use of C, D & E waste for inert fill, where this is necessary, can be categorised as a waste recovery operation. Waste recovery can be defined as any operation the principal result of which is waste serving a useful purpose by replacing other materials which would have otherwise been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or wider economy.
- 8.4.2 In Surrey, inert material derived from C, D & E waste is a valuable resource and when used in mineral site restoration as inert fill is considered to be a recovery operation. Given the need for this type of material in restoration, this activity is the preferred option over any other recovery operation.
- 8.4.3 Other types of recovery operations involving inert waste can include:
- Constructing haul roads / hardstanding;
  - Agricultural land improvements or other engineering operations.
- 8.4.4 Proposals involving the beneficial use of inert waste for recovery to land will be acceptable where the benefits of the development clearly outweigh any potential impacts as set out by Policy 5 below. Disposal of inert waste to land is considered unacceptable.
- 8.4.5 Surrey County Council as the Waste Planning Authority will consider whether the proposed waste development is 'recovery'. Such consideration involves an assessment of whether there is a genuine need for the development, or if the activity is in fact for the 'disposal' of waste to land for any other reason. Such consideration will include whether the activity involves restoration of mineral workings with inert material required by planning conditions and/or obligations.
- 8.4.6 The recovery of inert waste to land will be only supported if the development provides a significant benefit that would outweigh any significant adverse impacts. In the case of land remediation, the development must demonstrate a significant improvement to damaged or degraded land and/or provide a greater environmental or agricultural value than the previous land use.
- 8.4.7 The proposal must demonstrate that the quantity of waste to be used is the minimum amount required and any resulting changes to the landform would be sympathetic to the area. The development should respect the nature conservation and amenity interests of the site and surrounding area, including landscape character and visual amenity.
- 8.4.8 If an application, or part of an application, which includes a recovery to land operation is to be determined by a district or borough council, then Policy 5 – Recovery of Inert Waste to Land would apply as part of the decision making framework

### Policy 5 – Recovery of Inert Waste to Land

The recovery of inert waste to land is encouraged where this is necessary to implement a minerals restoration scheme.

Other development involving the deposit of inert waste on land may be acceptable, as waste recovery, if:

- i) There is a significant benefit or improvement from the development; and
- ii) The benefit or improvement cannot practicably and reasonably be met in any other way; and
- iii) The waste to be disposed of is inert and cannot practicably and reasonably be re-used, recycled or processed in any other way; and
- iv) The use of the inert waste material replaces the need for non-waste materials; and
- v) The development involves the minimum quantity of waste necessary.

Table 15 Monitoring for Policy 5 – Recovery of Inert Waste to Land

Measure/Indicator	<ul style="list-style-type: none"> <li>• Amount of inert waste disposed of on land for beneficial purposes (tonnes, %)</li> </ul>
Data Source(s)	<ul style="list-style-type: none"> <li>• Planning Applications and Decisions</li> <li>• Appeal Decisions</li> <li>• Environment Agency Waste Data Interrogator</li> <li>• Other sources of data as indicated in the Annual Monitoring Report</li> </ul>
Key Organisation(s)	<ul style="list-style-type: none"> <li>• Waste Planning Authority</li> <li>• Environment Agency (for information)</li> </ul>
Target(s)	<ul style="list-style-type: none"> <li>• 5% of C, D &amp; E waste sent for disposal to landfill by 2025</li> <li>• 0% of C, D &amp; E waste sent for disposal to landfill by 2033</li> </ul>
Trigger	<ul style="list-style-type: none"> <li>• Evidence of insufficient capacity for inert material.</li> </ul>

## 8.5 Disposal of non-inert waste to land

- 8.5.1 The SWLP aims to divert non-inert waste away from landfill by providing other types of facilities for the management of waste. Disposal of waste is therefore the least preferred option for waste management in the waste hierarchy, however it is an option Surrey County Council still need to plan for. There is a long history of non-inert landfill in Surrey at Patteson Court and this site has planning permission until 2030.
- 8.5.2 Sites for the disposal of non-inert waste to land are becoming more specialised. Waste sent to landfill should be the residue following other types of treatment such as recycling and recovery that cannot be dealt with in any other way and this means it will contain far less putrescible material and there will be less of it in total.
- 8.5.3 As these facilities become more specialised, the rate at which waste is received may reduce and so the overall restoration of the site may take longer. However, the type and quantity of waste that these sites receive may mean that the potential for amenity issues such as vehicle movements, odour and dust will reduce.
- 8.5.4 There are no allocated sites for new landfill in the SWLP, however proposals for extensions or alterations of existing landfill sites may come forward and so a policy is required to address such proposals. This policy would also be used to assess proposals to extend the end date for the completion of a permitted operations. Such proposals may not be supported if there has been a material change since planning permission was originally granted which means that landfilling at the site is no longer acceptable.
- 8.5.5 Biodegradable waste disposed of in landfill degrades to produce landfill gas, much of which is a combustible compound known as methane. Any application for landfill must provide details of how the site will be restored and any measures needed to manage landfill gas. The utilisation of landfill gas to produce energy provides significant benefit by helping reduce reliance on fossil fuels. This benefit is expected to be gained wherever possible. However, in the longer term, with a significant reduction in the amount of biodegradable waste disposed of to landfill, there is likely to be less gas to recover.
- 8.5.6 To ensure that the potential benefits of disposal through non-inert landfill are realised, proposals must include consideration of final use of the land, including proposals for a high quality of restoration and long term management plans for the restored site.

### Policy 6 – Disposal of Non-Inert Waste to Land

Planning permission for development involving disposal of waste to land operations will be granted where:

- i) The waste to be disposed of is the residue of a treatment process and cannot practicably and reasonably be re-used, recycled or recovered; and
- ii) Best practice measures are included to ensure maximum practicable recovery of energy from landfill gas; and
- iii) The resulting final landform, landscaping and after-uses are sympathetically designed and enhance the natural and historic environment.

Table 16 Monitoring for Policy 6 – Disposal of Non-Inert Waste to Land

Measure/Indicator	<ul style="list-style-type: none"> <li>Amount of non-inert waste by waste stream diverted from Landfill (tonnes, %)</li> </ul>
Data Source(s)	<ul style="list-style-type: none"> <li>Environment Agency Waste Data Interrogator</li> <li>Other sources of data as indicated in the Annual Monitoring Report</li> </ul>
Key Organisation(s)	<ul style="list-style-type: none"> <li>Waste Planning Authority</li> <li>Environment Agency</li> </ul>
Target(s)	<ul style="list-style-type: none"> <li>3% of waste from households sent for disposal to landfill by 2025</li> <li>0% of waste from households sent for disposal to landfill by 2033</li> <li>10% or less of C &amp; I waste sent for disposal to landfill by 2025</li> <li>5% or less of C &amp; I waste sent for disposal to landfill by 2033</li> </ul>
Trigger	<ul style="list-style-type: none"> <li>Evidence of insufficient capacity for non-inert material.</li> </ul>

## 8.6 Existing Sites

8.6.1 The following policies implement Strategic Objective 4: To retain and make best use of existing sites for waste development through safeguarding against non-waste development and supporting improvement of facilities.

### Safeguarding

8.6.2 The purpose of safeguarding sites in existing waste use or allocated for waste management facilities is to ensure that the need for existing or planned waste management infrastructure is taken into account in decision making by all planning authorities in Surrey.

8.6.3 The loss of existing or planned waste management sites to other types of development may make waste recycling, diversion and recovery targets harder to achieve. Surrey is a two-tier authority so the responsibility for determining the majority of planning applications for non-waste related development, such as housing, lies with Surrey's district and borough councils. It is essential that both tiers of authorities work together to ensure the provision of suitable waste management infrastructure.

8.6.4 Safeguarding is a material planning consideration but does not rule out alternative development. Whether planning permission should be granted or not is a decision for the borough or district council, in consultation with the Waste Planning Authority, and will depend on the circumstances of each individual case. Nevertheless, the presumption is that waste development should be safeguarded. This includes from proximate development that may adversely affect the efficient operation of the site.

8.6.5 The Surrey Consultation Protocol sets out how the county council and the district and borough councils will work together constructively to ensure waste safeguarding issues are taken into account as appropriate during the preparation of local plans and in the determination of planning applications. The Consultation Protocol and associated standing advice will be kept up to date to provide guidance on safeguarding issues.

### Policy 7 – Safeguarding

The following sites, which may be required for waste development will be safeguarded:

- i) Allocated sites for waste development; and
- ii) Sites in existing waste use including wastewater and sewage treatment works.

Table 17 Monitoring for Policy 7 – Safeguarding

Measure/Indicator	<ul style="list-style-type: none"> <li>• Number of safeguarded waste sites redeveloped for other uses contrary to advice from Surrey County Council as the WPA</li> </ul>
Data Source(s)	<ul style="list-style-type: none"> <li>• Planning Applications and Decisions</li> <li>• Appeal Decisions</li> </ul>
Key Organisation(s)	<ul style="list-style-type: none"> <li>• Waste Planning Authority</li> <li>• Local District and Borough Planning Authority</li> <li>• Development Industry</li> </ul>
Target(s)	<ul style="list-style-type: none"> <li>• No existing suitable waste sites lost contrary to advice from Surrey County Council as the WPA</li> </ul>
Trigger	<ul style="list-style-type: none"> <li>• Loss or reduction of existing or planned waste management facilities to other uses, contrary to Surrey County Council advice, which result net loss of strategic capacity (&gt;20,000 tonnes).</li> </ul>

#### Enhancement or extension

- 8.6.6 Existing waste development in Surrey is often well-established having been in operation for many years. Such development may benefit from permanent planning permission or a Lawful Development Certificate. Waste development which seeks to improve the capacity and efficiency of existing waste developments whilst reducing harmful impacts will be supported.
- 8.6.7 The enhancement or extension to an existing waste development may enable more waste to be recycled, recovered or processed for re-use within the existing footprint of the site and with fewer emissions due to improvements in technology or site layout.
- 8.6.8 To ensure no loss in existing capacity, re-development of any existing waste management sites must ensure that the quantity of waste to be managed is equal to or greater than the quantity of waste for which the site is currently permitted to manage, and/or that the management of the waste is being moved up the waste hierarchy.

### Policy 8 – Enhancement or extension of existing facilities

Proposals for the enhancement or extension of existing waste management facilities will be supported where:

- i) Enhancement will result in the quantity of waste to be managed being equal to or greater than the quantity of waste currently managed on site; or
- ii) Enhancement or extension will result in an improvement in the waste managed on site with reference to the waste hierarchy; and
- iii) Enhancement or extension will result in benefits to the environment and local amenity; and
- iv) The proposal is generally within the footprint of the current site.

Table 18 Monitoring for Policy 8 – Enhancement or extension of existing facilities

Measure/Indicator	<ul style="list-style-type: none"> <li>• Number of planning permissions granted for redevelopment, extension or enhancement of existing sites</li> </ul>
Data Source(s)	<ul style="list-style-type: none"> <li>• Planning Applications and Decisions</li> <li>• Appeal Decisions</li> </ul>
Key Organisation(s)	<ul style="list-style-type: none"> <li>• Waste Planning Authority</li> <li>• Local District and Borough Planning Authority</li> <li>• Development Industry</li> </ul>
Target(s)	<ul style="list-style-type: none"> <li>• No net loss of suitable capacity (tonnes)</li> </ul>
Trigger	<ul style="list-style-type: none"> <li>• There is a loss of suitable capacity which suggests that the plan is unable to meet the demand for new or enhanced facilities</li> </ul>

## 8.7 New Sites

- 8.7.1 The following policies help implement Strategic Objective 5: To direct new facilities to locations that have been identified as suitable for waste development.

### Green Belt

- 8.7.2 Approximately three quarters of the land within Surrey (some 121,941 hectares or 73%), is covered by the Green Belt. Generally the construction of new buildings in the Green Belt will be inappropriate, with the exception of the extension or alteration of an existing lawful building, where it does not result in a disproportionate addition, or the replacement of that building where the new building is not materially larger and the building remains in the same use.
- 8.7.3 The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.
- 8.7.4 However, it is not considered possible to meet the anticipated waste management needs of the county without developing waste management facilities on Green Belt land<sup>26</sup>. The overarching need for waste management in Surrey combined with a lack of suitable alternative sites outside the Green Belt and the need to locate facilities close to sources of waste are reasons why it is considered that very special circumstances may exist allowing development within the Green Belt.
- 8.7.5 Mineral development is not inappropriate development in the Green Belt, provided that it preserves the openness of the Green Belt and does not conflict with the purposes of including land in the Green Belt. Waste development which is related to the restoration of mineral sites can play a positive role in the objectives of the Green Belt. For example, restoration can result in a suitable after use of a site with opportunities for access to restored open countryside.
- 8.7.6 For proposals for waste management development in the Green Belt the applicant is required to provide clear evidence how the criteria set out in Policy 9 – Green Belt have been met.

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<sup>26</sup> See Site Identification and Evaluation Report September 2017

### Policy 9 – Green Belt

Proposals for the new or improved waste management facilities will be considered inappropriate unless the proposal preserves the openness of the Green Belt and does not conflict with the purposes of including land in the Green Belt or it is shown that very special circumstances exist.

Where proposals for development in the Green Belt are considered inappropriate, these will be supported where very special circumstances exist such that the benefit of the development clearly outweighs any potential harm to the Green Belt and any other harm.

In decision making, the following factors may contribute to very special circumstances:

- i) The lack of suitable non-Green Belt sites;
- ii) The need to find locations well related to the source of waste arisings;
- iii) The characteristics of the waste development including scale and type of facility; and
- iv) The site is allocated under Policy 10.

Table 19 Monitoring for Policy 9 – Green Belt

Measure/Indicator	<ul style="list-style-type: none"> <li>• Number of planning permissions granted for new waste management facilities in the Green Belt</li> <li>• Reasons for any planning permissions granted for new waste management facilities in the Green Belt</li> </ul>
Data Source(s)	<ul style="list-style-type: none"> <li>• Planning Applications and Decisions</li> <li>• Appeal Decisions</li> <li>• Other sources of data as indicated in the Annual Monitoring Report</li> </ul>
Key Organisation(s)	<ul style="list-style-type: none"> <li>• Waste Planning Authority</li> </ul>
Target(s)	<ul style="list-style-type: none"> <li>• There are no planning permissions granted for new waste management facilities in the Green Belt where these are not justified by VSC.</li> </ul>
Trigger	<ul style="list-style-type: none"> <li>• Successful appeal decision which requires the policy wording to be reviewed.</li> </ul>

### Strategic Waste Site Allocations

- 8.7.7 The allocation of a site within the SWLP gives certainty to the waste industry and local communities about the acceptability of the use of an identified site for a future waste use. However, all planning applications must be judged on their individual merits and the allocation of a site in the SWLP does not mean that a proposal for a waste use will automatically be granted planning permission.
- 8.7.8 Key development requirements set out the constraints on development at an allocated site identified as part of the site assessment process. Proposals for development on allocated sites will be expected to address the key development requirements set out for each allocation.
- 8.7.9 The proposal must be acceptable in its own right taking into account all material considerations including Green Belt policy. It is considered that very special circumstances exist for the allocation, for waste management purposes, of Green Belt sites given that insufficient land is available to meet the additional waste management capacity requirements outside the Green Belt. Sites proposed for allocation in the Green Belt are sites which contain, lie adjacent to or have been used for waste management provision in the past or are previously developed sites in whole or in part.
- 8.7.10 The fact that allocation of the site for waste management purposes in the Green Belt was deemed acceptable under the terms of the SWLP will support the case for very special circumstances by having already been through a process of site selection at the plan making stage.
- 8.7.11 Nevertheless additional considerations will still need to be taken into account at the time a planning application is submitted in order to comply with Green Belt policy. These consideration will need to be weighed in the balance when determining if very special circumstances exist. These are:
- a) An up to date assessment of the need for additional waste management capacity of the scale and type proposed in accordance with Policy 1 – Need for Non-landfill Waste Development.
  - b) Other site specific considerations dealt with under policies including Policy 14 – Development Management and Policy 15 –Transport.
- 8.7.12 This consultation draft version of the SWLP includes a short list of sites considered suitable for allocation in Policy 10. Details of the site location and the key development requirements for each of the potential sites are contained in **Annexe 1**. The next stage of preparing the SWLP, the pre-submission draft, will allocate sites suitable for waste management and provide details on suggested form, scale and access where appropriate<sup>27</sup>.

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<sup>27</sup> National Planning Policy Framework (NPPF) paragraph 157

### Policy 10 – Strategic Waste Site Allocations

Planning permission will be granted for the development of facilities to meet identified shortfalls in waste management capacity in Surrey at the following locations:

- a) Former Weylands sewage treatment works, Walton-on-Thames
- b) Land to the north east of Slyfield Industrial Estate, Guildford
- c) Land adjoining Leatherhead Sewage Treatment Works, Randalls Road, Leatherhead
- d) Land to the west of Earlswood Sewage Treatment Works, Redhill
- e) Land adjacent to Lyne Lane Sewage Treatment Works, Chertsey
- f) Land adjacent to Trumps Farm, Kitsmead Lane, Longcross
- g) Oakleaf Farm, Horton Lane, Stanwell Moor
- h) Land at Lambs Business Park, Terra Cotta Road, South Godstone
- i) Land at Martyrs Lane, Woking

Proposals for development in these locations will need to demonstrate:

1. How they are consistent with other policies of this Plan; and,
2. How the key development requirements for each site have been addressed

8.7.13 All sites will be subject to a formal planning application process and will be required to demonstrate that they are consistent with the policies in this plan including the key development requirements. For most sites this includes the need to demonstrate very special circumstances which justifies development in the Green Belt.

#### Other areas suitable for development of waste management facilities

8.7.14 It is possible that not all the sites allocated will come forward for waste uses. Commercial considerations will determine whether facilities will be built. Therefore, in order to provide additional flexibility, the SWLP also needs to identify other types of land which could accommodate waste management development.

8.7.15 The recycling and processing of waste can be carried out within modern, purpose-designed buildings that can be located in urban areas and industrial estates. These might be any well designed and managed waste operation including smaller operations, such as processing waste electrical and electronic equipment (WEEE).

- 8.7.16 While the location of waste uses on land identified for employment and storage purposes by districts and boroughs is encouraged, it is also recognised that, due to competition from other land uses and commercial and practical considerations, it cannot be wholly relied on to deliver the required waste management capacity over the plan period.

**Policy 11 – Other areas suitable for development of waste management facilities**

Planning permission will be granted for the development of facilities to meet identified shortfalls in waste management capacity in Surrey at the following locations:

- i) On land considered to be previously developed land and/or redundant agricultural and forestry buildings and their curtilages;
- ii) On land identified for employment uses, including industrial estates, by district and borough councils;
- iii) The site is otherwise suitable for waste development when assessed against other policies in the SWLP.

*Table 20 Monitoring for for Policy 10 – Site Allocations and Policy 11 – Other areas suitable for development of waste management facilities*

Measure/Indicator	<ul style="list-style-type: none"> <li>• Number of new waste facilities delivered on allocated sites</li> <li>• Number of new facilities delivered on unallocated sites in locations specified by Policy 11</li> </ul>
Data Source(s)	<ul style="list-style-type: none"> <li>• Planning Applications and Decisions</li> <li>• Appeal Decisions</li> <li>• Other sources of data as indicated in the Annual Monitoring Report</li> </ul>
Key Organisation(s)	<ul style="list-style-type: none"> <li>• Waste Planning Authority</li> <li>• Waste Industry</li> <li>• Development Industry</li> </ul>
Target(s)	<ul style="list-style-type: none"> <li>• 100% of new development is developed in suitable locations</li> </ul>
Trigger	<ul style="list-style-type: none"> <li>• Insufficient number of new waste management facilities being developed which suggests that the plan is unable to meet the demand for new or enhanced facilities</li> </ul>

## 8.8 Wastewater Treatment Works

- 8.8.1 There is an established network of sewage facilities within Surrey. The majority of wastewater treatment works (WwTW) have capacity to accept wastewater from the proposed growth without the need for improvements to existing facilities. However, it is important to recognise that significant spare capacity is not maintained at WwTW s due to the need to maintain efficiency and upgrades may be required to serve growth.
- 8.8.2 One new site has been identified for allocation as a new WwTW which is Thames Water's Guildford (Slyfield) Sewage Treatment Works within the Slyfield Area Regeneration Project (SARP). The efficient development of the SARP will require the relocation of the current WwTW together with the necessary supporting local drainage network infrastructure.
- 8.8.3 Thames Water is working with Guildford Borough and Surrey County Councils regarding the redevelopment of the SARP site and the feasibility of relocating the WwTW to the land identified in the Proposed Submission Local Plan within the SARP area. The proposed area for the relocation of the WwTW has been allocated as a part of the Strategic Waste Allocations (Policy 10). This includes land for future expansion should this be required.
- 8.8.4 The sewerage undertaker will review and assess the capacity for WwTWs, using the best available information in relation to new development (including housing and employment allocations). Therefore, there may be a need in the future for further sites for WwTW and the proposed policy should allow for flexibility to meet this need.
- 8.8.5 If new wastewater development is required, locational criteria can guide proposals to the most appropriate locations. This recognises that the location of new or improved facilities will depend on the location of new development e.g. housing and the investment programmes of the sewerage undertaker.

### Policy 12 – Wastewater Treatment Works

Planning permission for the development of new Wastewater and Sewage Treatment Works or for the improvement or extension of existing Wastewater and Sewage Treatment Works will be granted where:

- i) Development is needed to treat wastewater or sewage arising where the need cannot be practicably and reasonably be met at another site.
- ii) As appropriate, biogas, for use as an energy source, will be recovered effectively using best practice techniques.

Table 21 Monitoring for Policy 12 – Wastewater and Sewage Treatment Works

Measure/Indicator	<ul style="list-style-type: none"> <li>• Number of planning permissions granted for new wastewater treatment works</li> </ul>
Data Source(s)	<ul style="list-style-type: none"> <li>• Planning Applications and Decisions</li> <li>• Appeal Decisions</li> <li>• Other sources of data as indicated in the Annual Monitoring Report</li> </ul>
Key Organisation(s)	<ul style="list-style-type: none"> <li>• Waste Planning Authority</li> <li>• Sewerage Undertaker</li> </ul>
Target(s)	<ul style="list-style-type: none"> <li>• Sufficient capacity for wastewater treatment as identified by the sewerage undertaker</li> </ul>
Trigger	<ul style="list-style-type: none"> <li>• The sewerage undertaker identifies a need for greater capacity for wastewater treatment</li> </ul>

## 8.9 Conserving and Enhancing the Environment

8.9.1 The following policies implement Strategic Objective 6: To encourage innovation and best practice which provide opportunities to minimise the impact of waste development on communities and the environment.

8.9.2 The policies are designed to ensure that there would be no unacceptable harm to the environment and amenity or to other material planning considerations from waste development proposals.

### Sustainable Design

8.9.3 The SWLP seeks to ensure that all new development is of a high standard. It encourages well-designed schemes which will make a positive contribution to the quality of the local environment.

8.9.4 Waste development should seek to contribute to achieving sustainable development<sup>28</sup> by:

- Minimising waste and pollution to support health and wellbeing of our residents;
- Contributing to protecting and enhancing the natural and historic environment; and
- Supporting Surrey's competitive and nationally important economy.

8.9.5 Development should be resilient to the effects of climate change and rising sea levels. Facilities should promote energy efficiency and seek to reduce energy consumption related to the use of buildings.

8.9.6 Development should make sure that there is enough land available for any landscaping or biodiversity gains necessary on site. In addition, development of, and improvements in, Green Infrastructure should be achieved through good design of sites and facilities.

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<sup>28</sup> National Planning Policy Framework Paragraphs 6 and 7

### Policy 13 – Sustainable Design

Planning permission for waste development will be granted where it can be demonstrated that development follows best practice for built design. All waste development should demonstrate that the development:

- i) Is of a scale, form and character appropriate to its location
- ii) Includes necessary landscaping and biodiversity gains
- iii) Includes measures to maximise efficiency of water use during construction and operation;
- iv) Includes measures to minimise greenhouse gas emissions, including through energy efficiency and maximising the use of lower-carbon energy generation such as heat recovery and the recovery of energy from gas produced from the waste activity; and
- v) Includes measures to ensure resilience and enable adaptation to a changing climate.

Table 22 Monitoring for Policy 13 – Sustainable Design

Measure/Indicator	<ul style="list-style-type: none"> <li>• Number of planning applications which are permitted for new or enhanced waste management facilities is contrary to design guidance</li> </ul>
Data Source(s)	<ul style="list-style-type: none"> <li>• Planning Applications and Decisions</li> <li>• Appeal Decisions</li> </ul>
Key Organisation(s)	<ul style="list-style-type: none"> <li>• Waste Planning Authority</li> <li>• Waste Industry</li> </ul>
Target(s)	<ul style="list-style-type: none"> <li>• No planning applications permitted where design of new or enhanced waste management facilities is contrary to design guidance</li> </ul>
Trigger	<ul style="list-style-type: none"> <li>• Significant number of planning applications permitted where facilities are considered to be poorly designed.</li> </ul>

### Development Management

- 8.9.7 This development management section is concerned with addressing impacts that might arise during the operation of a waste management facility. The policies in the section are therefore concerned with ensuring that any significant adverse impacts do not occur.
- 8.9.8 It should be noted that some matters related to impacts on the environment and amenity are dealt with by environmental controls outside the planning system. Effects on air quality and soil quality are primarily a matter for other regulatory controls, but can be material planning considerations. The effect of development on the water environment as well as flood risk are also key considerations which can also be subject to other controls.

### General Amenity

- 8.9.9 Amenity generally refers to residents' expectations for enjoyment of their surroundings. It can cover a range of issues from noise, dust, odour, and disturbance due to illumination and vibration, to perceptions of the possible health effects of development.
- 8.9.10 The scale, appearance, and level of activity of waste development can result in impacts to amenity. It is important that such impacts are kept to an acceptable level. The impact of noise should consider construction noise, operating noise and noise from vehicles. Hours of operation may also be a consideration.
- 8.9.11 The release of fumes or emissions, including bioaerosols, from some waste management activities have potential to impact human health. Odours released from some waste activities may also affect the wellbeing of communities. Impacts related to emissions including dust and fumes should consider sensitive receptors as well as the extent to which impacts can be mitigated.
- 8.9.12 Proposals should consider potential for impacts from illumination and aim to minimise the impact of light pollution, glare and sky glow from artificial light on local amenity, intrinsically dark landscapes and nature conservation.
- 8.9.13 For proposals that would be likely to impact on air quality through dust, fumes or significant traffic generation, the developer should provide an assessment of the impact of pollutants in relation to surrounding sensitive receptors using suitable methodology and significance descriptors. The assessment should state the controls and mitigation that will be applied to avoid adverse impacts.

### Flood Risk

- 8.9.14 The responsibilities for Flood Risk are divided between the Environment Agency and Surrey County Council in its role as the Lead Local Flood Authority. The Environment Agency is responsible for taking a strategic overview of the management of all sources of flooding and coastal erosion. The Lead Local Flood Authority is responsible for managing the risk of flooding from surface water, groundwater and ordinary watercourses.
- 8.9.15 Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk by applying the sequential test and if necessary the exception test<sup>29</sup>.
- 8.9.16 Waste treatment (except landfill and hazardous waste facilities) are characterised as less vulnerable development and are generally appropriate in Flood Zone 1 and 2. Landfill and hazardous waste facilities are highly vulnerable and are generally appropriate in Flood Zone 1.
- 8.9.17 Development of any schemes within areas identified as at risk from flooding from surface water or groundwater should be assisted by early discussions with the Lead Local Flood Authority.

### Groundwater resources

- 8.9.18 Proposals should consider the proximity of groundwater resources and the potential risk for contamination. For example landfill is a potential hazard to groundwater quality and non-inert landfill must not be located in Source Protection Zone (SPZ) 1. In other locations, it will also be unacceptable, for example, on or in a major or principal aquifer or areas where there is a risk of groundwater pollution.
- 8.9.19 The developer should provide an assessment which shows how the water table and any underground aquifers would be affected by the development and any subsequent effects on matters such as salinity, the water level and the flow of water in nearby water bodies.

### Contaminated Soils and Groundwater

- 8.9.20 Contaminated soils or groundwater include those areas where previous uses of the site or adjacent land could have caused contamination e.g. industrial processes, petrol filling stations, fuel storage, chemical storage, vehicle parking/servicing etc. These may not be identified on any contaminated land register.

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<sup>29</sup> National Planning Policy Framework Paragraph 100

- 8.9.21 The developer is therefore responsible for determining whether land is suitable for development, or can be made so by remedial action. In order to demonstrate this, the developer should provide an assessment of potential pollutants and how any contamination would be addressed including a desktop and site walkover study.
- 8.9.22 The developer will need to satisfy the WPA that unacceptable risk from contamination will be successfully addressed through remediation. A remediation scheme should include future monitoring and maintenance schemes.

### Landscape

- 8.9.23 Government policy expects the planning system to “contribute to and enhance the natural and local environment” (NPPF, Paragraph 109). The NPPF states that “great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty” (NPPF, Paragraph 115).
- 8.9.24 Where possible, new development should take place outside such protected landscapes. It is recognised that there may be a requirement for new or extensions to existing development in order to meet local needs. Factors which may support a proposal being considered acceptable include:
- The proposal is for a small-scale facility to meet local needs and can be accommodated without undermining the objectives of the designation; or
  - The need for new facilities which cannot be met in another way or cannot be met from outside the designated area; and
  - Significant adverse impacts on the landscape and visual amenity can be adequately mitigated.
- 8.9.25 Regard should also be given to promoting sustainable forms of social and economic development that in themselves conserve and enhance the environment. Some proposals, such as the restoration of old mineral workings, which contribute to the improvement of the landscape, may be supported provided that the long term benefits of the scheme clearly outweigh the impact in the short-term, e.g. impacts to visual amenity.
- 8.9.26 Development of any schemes affecting landscape should be assisted by early discussions with officers. The Surrey Landscape Character Assessment (LCA) is a comprehensive assessment of the landscape character of the county. It takes account of the framework of the National Character Areas recently reviewed by Natural England and describes variations in the landscape character at a county level. The up to date LCA should be used to support plan making, policy development and to help inform planning applications.

### Biodiversity and Geodiversity

- 8.9.27 Areas or sites of international biodiversity importance should be protected unless there are no appropriate alternative solutions and there are overriding reasons which outweigh the need to safeguard the value of sites or features, and provided that favourable conservation status is maintained.
- 8.9.28 Areas or sites of international and European biodiversity importance in Surrey include:
- Special Protection Areas (SPAs);
  - Special Areas of Conservation (SACs);
  - Ramsar sites; and
  - Sites supporting 'European Protected Species'.
- 8.9.29 Areas or sites or priority habitats and species of national biodiversity or geological conservation importance in Surrey include:
- Sites of Special Scientific Interest (SSSIs);
  - National Nature Reserves (NNRs);
  - Ancient Woodland; and
  - Habitats and species of Principal importance in England.
- 8.9.30 Areas, sites or features of regional or local biodiversity or geological conservation importance in Surrey include:
- Sites of Nature Conservation Importance (SNCI);
  - Local Nature Reserves; and
  - Species of Conservation Concern identified for Surrey
- 8.9.31 Assessment should be undertaken to establish the nature conservation importance of the site (including its biodiversity and geodiversity) and proposals should be designed to minimise any significant adverse impacts on the site and on the surrounding area. Where development would result in the loss of or adversely affect an important area, site or feature, the harm is mitigated, or compensated for, including, where practicable, the provision of a new resource elsewhere which is of an equivalent value.
- 8.9.32 Applications for Energy from Waste or similar technologies should demonstrate the facility will not have an adverse air quality effect on internationally designated sites within a 10km radius. This should be accomplished through a project-level Habitat Regulation Assessment (HRA) screening and will need full appropriate assessment in the event that significant impacts are identified.

- 8.9.33 Green Infrastructure should provide a network of interconnected habitats to enable dispersal of species across the wider environment. Open spaces within developments should be linked to biodiversity in the wider countryside, including on designated sites, Priority habitats and Biodiversity Opportunity Areas (BOAs). Planning of Green Infrastructure should also provide 'ecosystem services' such as flood protection, microclimate control, pollination and filtration of air pollutants, and is therefore also integral to any Climate Change Adaptation strategy for an area.
- 8.9.34 Development of any schemes affecting biodiversity or geodiversity should be assisted by early discussions with officers. New developments should be designed to maintain and where possible enhance existing Green Infrastructure. In delivering biodiversity enhancements, measures should be taken to contribute to the Green Infrastructure network to maintain existing habitats and to enhance habitat connectivity. Production of a Green Infrastructure master-plan should be considered for large scale developments.
- 8.9.35 The positive role that high quality new development can play in providing new habitats and increasing biodiversity is recognised and development should include measures for the enhancement of biodiversity where justified by the nature of the proposal. Any creation, enhancement, and management of habitats, ecological networks, and ecosystem services should be consistent with wider environmental objectives.

### Historic Environment

- 8.9.36 Heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance. A heritage asset is defined as a building, monument, site, place, area or landscape positively identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest and may include a contribution from its setting.
- 8.9.37 A heritage asset will either be a Designated Heritage Asset (Listed buildings, Registered Historic Park or Garden, Conservation Area, Scheduled Ancient Monument) or a Non-Designated Heritage Asset (Locally Listed Park, Garden Building or Feature, Areas of High Archaeological Potential, County Sites of Archaeological Importance, Known site on the Historic Environment Record).
- 8.9.38 The Surrey Historic Environment Record (HER) holds information on known heritage assets; these databases may also help in the prediction of the likelihood of encountering currently unknown heritage assets of historic and archaeological interest. Developers will be required to record and advance understanding of the significance of any heritage assets affected during the development management process, and make any Information gained about the significance of the historic environment publicly accessible through submission of reports to the HER, publication and archiving.
- 8.9.39 Development of any schemes affecting heritage assets should be assisted by early discussions with heritage officers. Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties (NPPF, Paragraph 188). The objective of early discussion is to discuss detailed schemes for preservation, enhancement or mitigation. To do this, sufficient information must be presented so that officers are in a position to discuss plans and form opinions.

### Public open space and Rights of Way

- 8.9.40 Developers should provide an assessment of any open space or Public Rights of Way (PROW) lost, directly or indirectly affected by a proposed development. Where affected, operators will be required to make sure that the PROW remains accessible. This could be through measures to replace or compensate for such impacts and identification of any opportunities to improve facilities for walkers, cyclists, horse riders alternative routes which should be in place at the correct time.

### Land and soil resources

- 8.9.41 Land of grades 1, 2 and 3a of the Agricultural Land Classification is a national resource. Waste development should seek to use unproductive land preferentially. Operators should provide information on the quality of existing agricultural land. Any land to be restored to agriculture should be returned to a suitable agricultural classification even if that is not its original agricultural classification.
- 8.9.42 The developer should outline how the agricultural land classification would be protected or on completion of proposed operation, would be returned to the same agricultural land grade classification and the quality of any agricultural land lost and justification for its loss.
- 8.9.43 Developers should provide information on the measures that would be taken to safeguard the soil qualities during storage and/or restoration. If the importation of soils or waste is part of the proposal, operators should also provide information of the quality of imported soils/ other waste materials and how they would improve the land for agricultural purposes.

### Aerodrome Safeguarding

- 8.9.44 Any proposed development would need to comply with Aerodrome Safeguarding requirements to ensure that the operational integrity and safety of the airport are not compromised. This includes a range of factors for example the heights of buildings & structures, lighting, renewable energy, gas flaring etc.
- 8.9.45 All applications within the consultation area of civil and military aerodromes and airstrips and where:
- The proposal involves landfilling;
  - The development involves features attractive to hazardous birds such as: amenity landscaping and water features, this includes the enhancement of existing wet areas or water courses and buildings with ledges, gantries and flat roofs;
  - Where the proposal includes lighting which may impact on airport safety (i.e. dazzling);
  - Where a proposal involves the venting and flaring of gas.
- 8.9.46 Development of any schemes affecting any official or non-official aerodrome safeguarding areas should be assisted by early discussions with planning officers. Where development could affect these areas the developer should demonstrate how the development would not constitute a hazard to air traffic, with or without mitigation.

### Cumulative Effects

- 8.9.47 Account should be taken of the local area including any assessments that have been undertaken. Where short-term significant adverse impacts are identified e.g. during construction of a new facility it is important that any significant adverse impacts in the short-term, e.g. the impacts of HGVs on residential or visual amenity, are outweighed by the long-term benefits.

#### Policy 14 – Development Management

Planning permission for waste development will be granted where it can be demonstrated that there will not be an unacceptable impact on communities and the environment including:

- i) General amenity including air quality, noise, dust, fumes, odour, vibration, illumination, including that related to traffic, generated by the development; and
- ii) Flood risk, including opportunities to enhance flood storage, surface water quality, and surface water drainage; and
- iii) Those on ground water resources including ground water quality, the protection of Source Protection Zones and Areas of Groundwater Vulnerability; and
- iv) Those related to contamination of land or groundwater; and
- v) The appearance, quality and character of development in the landscape and any features that contribute to its distinctiveness; and
- vi) Those on the natural environment, biodiversity and geological conservation interests including green infrastructure; and
- vii) Those on the historic landscape, sites or structures of architectural and historic interest and their settings, and sites of existing or potential archaeological interest or their settings; and
- viii) Those on public open space, the rights of way network, and outdoor recreation facilities; and
- ix) Those affecting the use, quality and integrity of land and soil resources and land stability; and
- x) Those affecting aerodrome safeguarding and the risk of birds striking aircraft; and
- xi) Cumulative impacts arising from the interactions between waste developments and between waste development and other forms of development; and
- xii) Any other matter relevant to the planning application.

Table 23 Monitoring for Policy 14 – Development Management

Measure/Indicator	<ul style="list-style-type: none"> <li>• Number of planning applications where there would be a significant adverse impact on community or environment.</li> </ul>
Data Source(s)	<ul style="list-style-type: none"> <li>• Planning Applications and Decisions</li> <li>• Planning Appeals</li> </ul>
Key Organisation(s)	<ul style="list-style-type: none"> <li>• Surrey County Council</li> <li>• Waste Industry</li> </ul>
Target(s)	<ul style="list-style-type: none"> <li>• No planning applications permitted where there would be a significant adverse impact on community or environment are permitted.</li> </ul>
Trigger	<ul style="list-style-type: none"> <li>• Significant number of planning applications permitted where there would be a significant adverse impact on community or environment are permitted.</li> </ul>

## 8.10 Transport and Connectivity

8.10.1 The following policies implement Strategic Objective 7: To keep waste movement by road to minimum practicable levels and support options for sustainable transport.

### Transport of Waste

8.10.2 Congestion and HGV movements are key areas of concern for local communities. This is evidenced by the Surrey Transport Plan and supporting Transport Plan Strategies.

8.10.3 In order to mitigate impacts related to transport Traffic Management Plans would generally be required at the planning application stage. Applications for waste development will often require a Transport Assessment to support them. Traffic Management Plans and Transport Assessments will be considered by the Highway Authority, who will make recommendations as appropriate.

8.10.4 Waste development which provides opportunities for the movement of waste via alternative methods of transport e.g. rail will be supported. Applications which demonstrate a reduction in vehicle movements e.g. through co-location of facilities within the same site or other benefits with respect to transport will also be supported.

### Policy 15 – Transport and Connectivity

Planning permission for waste development will be granted where it can be demonstrated that:

- i) Where practicable and economically viable, the development makes use of rail or water for the transportation of materials to and from the site; or
- ii) Transport links are adequate to serve the development or can be improved to an appropriate standard.

Where the need for road transport has been demonstrated, the development has ensured that:

- i) Waste is able to be transported using the Lorry Route Network with minimal use of local roads, unless special circumstances apply; and
- ii) Vehicle movements associated with the development are minimised; and
- iii) Vehicle movements associated with the development will not have an unacceptable impact on the capacity of the highway network; and
- iv) There is safe and adequate means of access to the highway network and vehicle movements associated with the development will not have an adverse impact on the safety of the highway network; and
- v) Satisfactory provision is made for vehicle turning and parking, manoeuvring, loading, and, where appropriate, wheel cleaning facilities.

Table 24 Monitoring for Policy 15 – Transport

Measure/Indicator	<ul style="list-style-type: none"> <li>• New or existing waste sites in relation to waste sources</li> <li>• Average waste miles</li> </ul>
Data Source(s)	<ul style="list-style-type: none"> <li>• Surrey County Council Development Management</li> <li>• Surrey County Council Transport Development Planning</li> </ul>
Key Organisation(s)	<ul style="list-style-type: none"> <li>• Surrey County Council</li> </ul>
Target(s)	<ul style="list-style-type: none"> <li>• 100% of proposals include assessment of ability to transport waste via sustainable modes</li> <li>• Main waste sources well connected to facilities</li> </ul>
Trigger	<ul style="list-style-type: none"> <li>• Significant source(s) of waste is/are not well connected to waste development</li> </ul>

## 9 Engagement

9.1.1 The following section relates to Strategic Objective 8: To work closely with our partners such as Surrey Waste Partnership, District and Borough councils and other Waste Planning Authorities to deliver the SWLP.

### 9.2 Duty to Cooperate

9.2.1 Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended) places a duty on Local Planning Authorities (LPAs), in preparing local plans, to “engage constructively, actively and on an ongoing basis” with other relevant organisations<sup>30</sup> to maximise the effectiveness with which plan preparation is undertaken.

9.2.2 Surrey County Council, as the WPA, recognises that there are other bodies not covered by the Duty to Cooperate (DtC). Engagement with other organisations including Local Enterprise Partnerships (LEPs), infrastructure providers, environmental bodies, developers and existing waste operators is essential to delivering the new SWLP.

### 9.3 Meeting the Duty to Cooperate

9.3.1 Effective cooperation requires ongoing, sustained joint working with concrete actions and outcomes. It is unlikely to be met by an exchange of correspondence, conversations or consultations between authorities alone<sup>31</sup>.

9.3.2 As such, while it is important for preparing the new SWLP, the DtC will remain a core part of the work for planning policy in Surrey County Council. Activity associated with the Duty to cooperate will be reported in the Annual Monitoring Report. The DtC will be met through activities such as:

- Formal consultation process;
- Meetings, including for joint-working between different authorities;
- Memoranda of Understanding;
- Statements of Common Ground;
- Monitoring.

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<sup>30</sup> Regulation 4 of The Town and Country Planning (Local Planning) (England) Regulations 2012

<sup>31</sup> Planning Practice Guidance for Duty to Cooperate. Paragraph: 010 Reference ID: 9-010-20140306

Table 25 Monitoring for Duty to Cooperate

Measure/Indicator	<ul style="list-style-type: none"> <li>• Number of Duty to Cooperate consultations received</li> <li>• Projects delivered through joint-working</li> <li>• Attendance of joint working groups</li> <li>• Memoranda / Statements are kept up to date</li> </ul>
Data Source(s)	<ul style="list-style-type: none"> <li>• Consultations Log</li> <li>• Final project reports</li> <li>• Meeting minutes from joint working groups</li> </ul>
Key Organisation(s)	<ul style="list-style-type: none"> <li>• Surrey County Council Development Management</li> <li>• Other Waste Planning Authorities</li> <li>• Surrey Districts and Boroughs</li> </ul>
Target(s)	<ul style="list-style-type: none"> <li>• 100% attendance at joint working groups</li> </ul>
Trigger	<ul style="list-style-type: none"> <li>• Poor attendance at joint working groups</li> <li>• Joint working groups are no longer running</li> </ul>

## 9.4 Community Engagement

### Surrey County Council Statement of Community Involvement (SCI)

9.4.1 The Statement of Community Involvement (SCI) sets out how Surrey County Council will involve local residents, local businesses and other key organisations and stakeholders in the plan-making process and in the determination of planning applications.

### Developer Statement of Community Involvement

9.4.2 The NPPF encourages pre-application discussions and states that 'early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties'. Hence the WPA wishes to encourage developers to inform the community of their plans to ensure that a link is established at an early stage in the process.

9.4.3 Surrey County Council's revised Validation Checklist requires that any proposal with substantial community interest requires a statement explaining how the applicant has complied with the pre-application engagement recommendation made in Surrey County Council's Statement of Community involvement.

9.4.4 Issues arising from the operation of larger waste developments are often addressed through site liaison groups that involve local communities and operators. The establishment of liaison groups will be sought for major development where there could be a need for a regular forum for discussions between local residents, the waste planning authority, the operator, and the relevant agencies.

### Policy 16 – Community Engagement

Planning permission for waste development will be granted where it is demonstrated that the applicant has undertaken suitable steps to engage with the local community before submitting their application.

Table 26 Monitoring for Policy 16 Community Engagement

Measure/Indicator	<ul style="list-style-type: none"> <li>Number of relevant applications which are supported by a Statement of Community Involvement produced by the applicant</li> </ul>
Data Source(s)	<ul style="list-style-type: none"> <li>Planning Applications and Decisions</li> <li>Appeal Decisions</li> </ul>
Key Organisation(s)	<ul style="list-style-type: none"> <li>Waste Planning Authority</li> <li>Waste Industry</li> </ul>
Target(s)	<ul style="list-style-type: none"> <li>100% of relevant applications which are supported by a Statement of Community Involvement produced by the applicant</li> </ul>
Trigger	<ul style="list-style-type: none"> <li>Low numbers of relevant applications are supported by a Statement of Community Involvement produced by the applicant</li> </ul>