

Surrey County Council Waste Planning

Surrey Waste Local Plan

2018–2033

Issues & Options

Summary of Responses

Report

Version 0.1

December 2016

Issues & Options Response Report

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Executive Summary

- Between 2 September and 25 November 2016 Surrey County Council consulted on an Issues and Options Paper and a number of supporting documents as part of the preparation for the new Surrey Waste Local Plan (SWLP 2018).
- The Issues and Options Paper was the first formal opportunity for stakeholders to contribute to the new SWLP 2018 and set out the strategic (spatial and policy) context for waste management and explored the overall scale of need for additional waste management facilities in Surrey over the Plan period.
- A wide range of media (newsletters, website, twitter), correspondence and meetings was used to inform individuals and organisations about the new SWLP and seek their comments.
- Twenty four responses were received from Duty to Cooperate (DtC) bodies and other agencies including; the Environment Agency, Historic England, Natural England, Transport for London (TfL) and Network Rail, two Area of Outstanding Natural Beauty (AONB) Management Boards, two Statutory Water Undertakers, nine Waste Planning Authorities (WPAs) and six Surrey district and borough councils.
- Ten responses were received from waste site operators and/or landowners.
- Six hundred and thirteen representations were received from the public (See Appendix 3 for a map showing responses per borough and district). Only three parish councils and/or residents associations responded. Only one action group responded.
- The responses were received as a mix of on-line responses, paper questionnaires, letters and emails.
- Generally, respondents supported the draft vision and the principles set out in the draft objectives. Particularly the aspiration to minimise landfill waste through prevention, re-use, recycling, and recovery. Most comments on the draft vision related to whether 'zero waste to landfill' was achievable.
- A number of responses commented that a greater emphasis was needed on environmental protection, in particular DtC bodies recommended that the objectives address the issues of safeguarding habitats for wildlife and high value landscapes.
- There was strong support for partnership working, including between Surrey County Council, district and borough councils and other authorities. The Council will continue to work with our partners in particular through the DtC around specific sites or areas identified as suitable for waste use.
- All the issues raised will be addressed and the vision and objectives refined. The responses will also inform the spatial strategy for the new SWLP. A further round of consultation will be undertaken in July 2017 on the content of a draft plan.

If you have any questions about the consultation or you are having difficulty in accessing the documents please contact Surrey County Council:

Contact Us



Phone: 03456 009 009



Email: wasteplan@surreycc.gov.uk



**Letter: Planning and Development Service,
Room 385 County Hall, Penrhyn Road,
Kingston upon Thames, KT1 2DW**

1 Introduction

1.1 Preparing a new Surrey Waste Local Plan

- 1.1.1 Waste management infrastructure is essential to support a modern economy. It is crucial that we plan for waste related development to ensure there are sufficient facilities to manage waste sustainably.
- 1.1.2 Waste Local Plans set out the planning framework for the development of waste management facilities and are used in determining planning applications for waste facilities. The current Surrey Waste Plan was adopted in 2008. Since it was adopted in 2008 a number of new challenges have arisen, including:
- Changes in the policy landscape and approaches to plan-making.
 - Evolution of waste management technologies and approaches.
 - Current and emerging local conditions including pressure to release allocated waste sites to alternative development.
 - Changes in patterns of waste production.
- 1.1.3 It is essential that the Waste Local Plan is kept up to date to provide a robust policy framework to support the sustainable management of waste. The new Surrey Waste Local Plan (SWLP) will cover the period from 2018 to 2033 and will help to ensure that Surrey is able to provide sufficient waste management capacity and ensure waste is managed in the most sustainable way.

Figure 1 Key stages in delivering the Surrey Waste Local Plan 2018 – 2033



1.2 Issues and Options Consultation

- 1.2.1 Between 2 September and 25 November 2016 Surrey County Council consulted on an 'Issues and Options Paper' as part of the preparation of the new Surrey Waste Local Plan.
- 1.2.2 The Issues and Options Paper sought views on the strategic context, the vision and the objectives for sustainable waste management in Surrey. The paper was supported by a number of technical papers which were also made available on the council's website. These included:
- Background Policy Paper No 1: Context and Issues
 - Background Policy Paper No 2: Capacity Estimate Scoping Statement
 - Background Policy Paper No 3: Assessment of Suitable Land Scoping Statement
 - Background Policy Paper No 4: Duty to Cooperate Scoping Statement
- 1.2.3 A 'Search for Suitable Land' was linked to this consultation which gave particular stakeholders, including landowners, the opportunity to propose areas of land, which might be suitable for waste management, for allocation in the SWLP.
- 1.2.4 This document provides a **summary** of the responses received to the Issues and Options consultation and supporting documents. This is in accordance with the council's Statement of Community Involvement (adopted in 2015) (see Section 6.1).
- 1.2.5 This document sets out some initial views on the council's response to the issues raised. Fuller responses will be prepared as the plan progresses and these will be published in an updated version of this document alongside the draft version of the new SWLP.

2 Summary of consultation undertaken

- 2.1.1 Surrey County Council used a wide range of media (newsletters, website, twitter), correspondence and meetings to inform individuals and organisations about the new SWLP Plan and to seek their comments.
- 2.1.2 The council's website supported the consultation through a dedicated webpage, including links to PDF copies of documents and a link to the online survey.
- 2.1.3 Notification was made at the start of the consultation to a wide range of individuals and organisation by either email or letter. Printed copies of the documents, along with flyers, were provided in the district and borough council offices and libraries.
- 2.1.4 Self-sealing summary and question forms were also available at district and borough council offices and local libraries. Articles were carried in Surrey Matters (print and e-newsletter) and Surrey Economic Prospects in September and October 2016.

3 Duty to Cooperate bodies

3.1 Duty to Cooperate

- 3.1.1 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 to maximise the effectiveness with which plan preparation is undertaken.
- 3.1.2 Methods of implementing the Duty to Cooperate (DtC) are set out in both the National Planning Policy Framework (NPPF) (2012) and the national Planning Practice Guidance (nPPG) (2014). Under the DtC, Local Planning Authorities are expected to work ‘collaboratively with other bodies to ensure that strategic priorities across local authority boundaries are properly coordinated and clearly reflected in local plans’ (paragraph 179 of the NPPF).
- 3.1.3 The DtC applies to specific bodies as set out in the relevant legislation and guidance. Section 110 of the Localism Act 2011, places a legal duty on Local Planning Authorities to cooperate with one another; county councils and other prescribed bodies. Those prescribed bodies are identified in identified in Regulation 4 of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).
- 3.1.4 As part of preparing the new SWLP, the WPA will need to take account of, and as appropriate align with, other planning policy (including emerging and updated). This will include minerals and waste plans from adjoining authorities, changes to national planning policy and other local (district or borough council and neighbourhood) plans.
- 3.1.5 In order to demonstrate how the council is discharging its duty, a ‘Duty to Cooperate Scoping Statement’ was prepared which sets out who the Council is engaging with throughout the development of the new SWLP, on what matters and how and when this is happening. The Council consulted on the Scoping Statement as part of the Issues and Options Consultation between September and November 2016.

3.2 Overview

- 3.2.1 Twenty four responses were received from DtC bodies and other statutory consultees including; The Environment Agency, Historic England, Natural England, TfL and Network Rail, nine WPAs and six Surrey district and borough councils. In addition, responses were received from two AONB Management Boards who, while not strictly covered under the DtC, were felt to fit best within this section of the report. The list of those DtC bodies (as well as other organisations) who responded is included in Appendix 2.
- 3.2.2 The majority of comments were related to detailed aspects of the report such as specific waste movements, forecasts and potential sites. Many of these concerns will be addressed in evidence based documents on specific waste streams. The council will be informally consulting on these documents in early 2017 and formally consulting on them alongside the draft plan.

3.3 Context

Policy

- 3.3.1 One WPA suggested that references to Landfill Directive (1999/31/EC) and Water Framework Directive (Water FD) (2000/60/EC) could be included.
- 3.3.2 It was noted that there are a number of new planning policy documents being prepared by district and borough councils within Surrey which the new SWLP will need to take account of. These documents may include areas and sites for new housing developments which may affect the planned waste arisings and the need for new waste facilities.
- 3.3.3 New policies being developed by district and borough councils may also constrain potential waste sites, this includes sites which allocate or provide criteria for employment use. The council will try to discourage policies in local plans which unnecessarily show prejudice against waste facilities especially given that these facilities vary in their size, scale and impacts and can contribute to employment and productivity.
- 3.3.4 The Council will work with district and borough councils to ensure that waste facilities can be delivered alongside other types of growth.

Housing figures

- 3.3.5 There was some concern raised by the district and borough councils over the use of the Surrey Infrastructure Study figures in describing the context for housing growth in Surrey. These figures are based on expected delivery of houses for each Surrey district and borough for July 2015 and are based on 2012 Office of National Statistics (ONS) projections which have now been superseded by 2014 figures.
- 3.3.6 It was also suggested that there was a need to identify locations in different parts of the County where specific issues relating to the management of waste are likely to arise due to population and employment increases. It is recognised that this spatial approach will be important in developing the council's spatial strategy.

Waste Arisings

- 3.3.7 It was requested that additional documents should be produced over the course of preparing the new Surrey Waste Local Plan to give more information about:
- Imports and exports of waste to and from Surrey
 - Specialist types of waste (e.g. hazardous, medical etc.)
 - Location of the landfill sites
 - Location of current waste sites
- 3.3.8 It is the Council's intention to prepare a number of reports including technical studies for a) waste arisings and b) existing waste capacity that will address these matters. These reports will be formally consulted on alongside the draft plan.

Environmental Protection

- 3.3.9 Generally, consultees were pleased to see that the main potential issues regarding biodiversity and the natural environment had been highlighted. Indeed, some consultees suggested that environmental information could be expanded to provide more details. For example, the Environment Agency provided useful information on groundwater.
- 3.3.10 Natural England recommend that further consideration is given to the re-use of waste for mineral site restoration where there is a biodiversity benefit i.e. for habitat creation/restoration projects.
- 3.3.11 The information provided will be reviewed and taken into account when ensuring that the plan provides appropriate environmental protection.

Green Belt

- 3.3.12 A number of Surrey district and borough councils suggested that stronger emphasis was required for land designated as Green Belt. Responses highlighted that Green Belt is an important policy designation and the approach being taken should be clarified. Specifically, this was related to the process for selecting sites and the considerations to be taken into account when considering development in the Green Belt. This will be taken into account in the draft Plan.

Transport

- 3.3.13 The County Highway Authority have responded with additional information which outlines in more detail the planning context with respect to transport. This included amendments to:
- Issues and Options Consultation Report: Section 3.3. Transport with references to the Freight Strategy (STP 2011-2026).
 - Policy Paper 1 Context and Issues: Transport Infrastructure: Heavy Goods Vehicles (3.5.1) and Transport Infrastructure and HGV Movements (Appendix 5)
- 3.3.14 This information will need to be considered and the relevant documents reviewed.

Plan period

- 3.3.15 Several Surrey district and borough councils suggested that the plan period could be longer to align better with local plans being developed by some Surrey district and borough councils. The challenge for the county council is that all local plans are being developed with slightly different plan periods and therefore there is unlikely to be one suitable plan period.

3.4 Issues

Visual Impact

- 3.4.1 The Surrey Hills Area of Outstanding Natural Beauty (AONB) Management Board and High Weald AONB Management Board have suggested that greater emphasis could be placed on conserving the landscape and scenic beauty of an AONB.
- 3.4.2 The High Weald AONB Management Board suggested that it was important to recognise the balance to be struck between the landscape and visual impact of certain types of waste management activity and agricultural productivity/rural economy e.g. Anaerobic Digestion (AD), wood recycling and other farm based facilities.

Deliverability

- 3.4.3 One consultee raised the issue of deliverability of new facilities and their funding. The council acknowledges that deliverability of sites may be an issue given that compared to other types of land use e.g. residential or commercial, waste use may be considered a relatively low value one.
- 3.4.4 It is considered unlikely that CIL would contribute to the development of new sites, but in some instances may be justified and welcomed as part of the necessary infrastructure to facilitate housing growth e.g. within a new settlement.

London's waste

- 3.4.5 The consultation documentation recognised that regionally-derived targets, including provision for accepting London's waste, were no longer in force. However, one consultee suggested that guidance is considered to address paragraph 44 in the nPPG which states: "given the unique waste needs of London, there is likely to be a need for waste planning authorities surrounding London to take some of London's waste".
- 3.4.6 It is acknowledged that there may be significant waste movements between London and authorities surrounding London such as Surrey. The intention is to address these under the DtC as outlined in the DtC Scoping Statement.

Strategic infrastructure

- 3.4.7 Several consultees suggested that the new SWLP should include provision for waste arising from an expanded Heathrow Airport as well as the development and construction phase of any expansion. In addition, TfL and Network Rail raised issues of land required near at least one existing waste site to facilitate Crossrail 2.
- 3.4.8 The council is aware of a number of major infrastructure projects e.g. Heathrow Airport expansion, HS2, Cross Rail 2 and River Thames Scheme, and recognises the need to account for the potential impact of these projects on waste arisings and consider what type(s) of strategic provision may need to be provided.
- 3.4.9 This will be done by identifying those strategic infrastructure projects which may produce large amounts of waste. Discussions will then be needed to determine how much of this is likely to be managed in Surrey. Once it is known how much waste is likely to be expected, it can be determined if any additional capacity is required.

3.5 Draft Vision

3.5.1 Overall, the draft vision was supported by consultees (Figure 1). All consultees were supportive of the vision being positive and the general aim which is to drive waste management up the waste hierarchy.

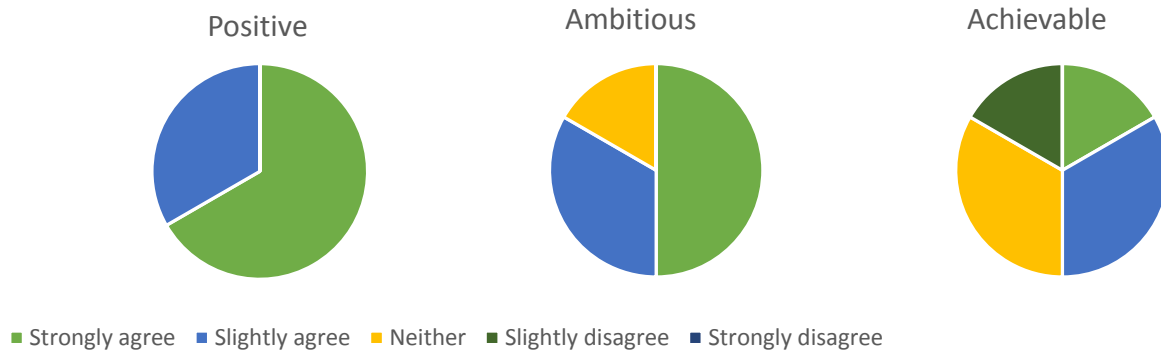


Figure 1 Result of Duty to Cooperate bodies views of the vision (%)

Targets for landfill

3.5.2 The majority of comments on the draft vision related to whether 'zero waste to landfill' was achievable. Most supported the aspiration to minimise landfill waste through prevention, re-use, recycling, and recovery however, felt that the target of no waste to landfill was unrealistic.

3.5.3 Some suggested that this target could apply to one or more waste streams where specified. For example, there is already a high diversion rate from landfill for household waste however it is appreciated that there will always be some residual waste which will need to be sent to landfill.

3.5.4 Although the vision is intended to be ambitious and aspirational, its appropriateness will be reviewed. The emphasis will continue to be that the vision should set a high standard for sustainable waste management in Surrey..

Managing our own waste

3.5.5 A few comments were made in respect of a lack of clarity in the vision. Specifically these were:

- a) No clear mechanism or criteria were included for how economic benefits of waste management will be shared with communities
- b) Asking residents and businesses to take ownership of the waste they produce was confusing

3.5.6 Again, this may require a review of the vision wording to make sure it is clear and accessible to a range of stakeholders.

Biodiversity

- 3.5.7 One consultee commented that the vision could further encourage protection and enhancement of the environment by including net gains for biodiversity and opportunities for enhancement and improving connectivity. The council will consider this as the vision wording is reviewed to ensure appropriate protection and enhancement of the natural and historic environments.

3.6 Draft Objectives

Working with our partners

- 3.6.1 Many comments picked up on the fact that Surrey is a two-tier authority area and that there was a strongly positive response to the council working with district and borough councils and our other partners in preparing the new SWLP.

Environmental Protection

- 3.6.2 Natural England recommended that the vision and objectives address impacts and opportunities for the natural environment with particular strategic approach to the protection and enhancement of the natural environment.
- 3.6.3 Historic England noted that heritage assets such as Registered Parks and Gardens, Scheduled Monuments, and archaeological resources generally, are most likely to be affected by waste management facilities.
- 3.6.4 Historic England suggested that rewording some of the objectives would help to promote the conservation of the natural and built environments, specifically that Objective 6 was amended with the addition “and the historic and natural environment”.
- 3.6.5 As mentioned above both the Surrey Hills and High Weald AONBs suggested that a greater emphasis be placed on valuing protected landscapes. This will be considered during the preparation for the new SWLP.

Restoration

- 3.6.6 Multiple respondents suggested that the objectives should also refer to ensuring restoration of waste management sites to ensure sustainable after uses to benefit the communities particularly given the ambition to divert waste away from landfill. This was reinforced by comments from Natural England which stated that the new SWLP should aim for a net gain for biodiversity considering opportunities for enhancement and improving connectivity with an emphasis on designated environmental assets.
- 3.6.7 The council has published a supplementary planning document on site restoration, which focuses on minerals sites but also applies where waste facilities are linked to a minerals related development (such as aggregates recycling and landfill). Nevertheless, if there are sites which are suitable for temporary waste uses and these are not linked to a minerals development, then an objective specifically for the restoration of waste management sites may be needed.

3.7 Options

Objective 1: To increase the sustainable management of waste through waste prevention, re-use, recycling and recovery

- 3.7.1 Majority of responses strongly supported the option to work with our stakeholders to prioritise the management of waste through prevention, re-use, recycling and recovery. In addition, responses supported the option to reduce the waste sent to landfill by encouraging other types of facilities, but recognising that landfill is a last resort and one which still needs to be planned for. This accepts that some landfill may still be required as a contingency measure or as the most suitable treatment method for certain types of waste.

Objective 2: To encourage communities and businesses to take responsibility for their own waste

- 3.7.2 There was support for options seeking to promote the management of waste in locations close to the sources of waste arisings, subject to consideration of local amenity. However, consultees also noted that in Surrey there is likely to be strong competition for land for housing and employment around existing communities and businesses which may affect the deliverability of sites.

Objective 3: To ensure new waste management facilities are developed in suitable locations

- 3.7.3 The principle that waste should be managed – where possible – close to where it arises was supported but the importance of residential amenity considerations of existing and future residents was stressed.
- 3.7.4 Consultees supported a collaborative approach between the county council and the borough and district councils in order to explore options for locating facilities near to key centres of population. One consultee suggested that to avoid conflict the intention should be to locate facilities alongside areas identified for other uses, rather than within them.
- 3.7.5 Consultees stressed the need to identify specific sites as it was considered that broad areas were not sufficiently clear or robust. Alongside this, a number of Surrey district and borough councils welcomed the opportunity to be consulted on sites and areas as early as possible.
- 3.7.6 Under this objective, Thames Water highlighted the continued need for a specific wastewater/sewage sludge treatment policy as this type of waste management has different geographical and technical requirements compared to other forms of waste management. The council recognises that a specific policy for wastewater will need to be included in the new SWLP.

Objective 4: To make the best use of land when managing waste

- 3.7.7 It was noted that locating waste facilities at industrial locations with non-waste uses, if appropriate, could reduce impacts to residential amenity as such sites are likely to already be suitable for heavy vehicle movements. However, there will be strong competition for such land in Surrey given the limited amount of employment land. In addition, the council will need to ensure that this will not conflict with proposed district and borough council policies which have designated areas as safeguarded employment sites.
- 3.7.8 Some consultees preferred the improvement and enhancement of existing facilities, as the option which was most likely to require the least use of additional land. Although this was caveated by the need to consider local amenity and accessibility issues in identifying potential site options.
- 3.7.9 A number of Surrey district and borough councils were concerned about locating facilities in land designated as Green Belt. Some supported the potential location of waste management facilities in the Green Belt as long as the approach was compliant with the NPPF policy on uses in the Green Belt (paragraph 89 to 91, NPPF). Further to this, some commented that the allocation of sites in the Green Belt should only take place if exceptional circumstances can also be proven and after all areas or sites that are not within the Green Belt have been assessed and found unsuitable.
- 3.7.10 Several consultees supported the prioritisation of locating waste management uses on previously developed land. However, some noted that there was concern that this might result in competition for a small amount of available employment land between waste infrastructure and other employment or industrial uses. In addition, issues with sustainability, including accessibility considerations, would need to be taken into account with regards to the appropriateness of using redundant agricultural buildings.
- 3.7.11 Natural England noted that they did not support allowing development on greenfield sites. Some other consultees stated that this option should only be pursued as part of a sequential approach to sites, whereby greenfield sites are only considered after all sites in the urban area and those on Previously Developed Land have been utilised or are found to be unsuitable. The council will need to consider this when looking at how land is assessed to be suitable for waste use.
- 3.7.12 Nearly all consultees stated that only those waste management facilities in locations which are consistent with the vision and objectives of the plan should be safeguarded.

Objective 5: To maximise the economic benefits of waste management

- 3.7.13 There was strong support for options which encourage the re-use and recycling of construction waste and the use of recycled materials in construction. There was less support for developing sites which may contribute to employment and productivity in the local area.

- 3.7.14 Promoting the benefits that the waste management sector, which provides employment and contributes to the local economy, is an additional area of work for the council. In particular, this is important for ensuring that any policies for employment land in district and borough Local Plans do not exclude certain types of waste uses.

Objective 6: To encourage innovation and new technologies which provide opportunities to minimise the impact of waste development on communities and businesses

- 3.7.15 Comments related to Objective 6 agreed that facilities should be well-designed, well-constructed and well operated. However, more information was required about what this meant recognising that different types, scales and locations of facilities will have different capacities and constraints.
- 3.7.16 Historic England suggested that Objective 6 could be supported by the inclusion of an additional option such as: “Avoid, or where unavoidable minimise or mitigate, the impact of waste facilities on sites and areas of high historic or natural environment value and significance”. All options including those provided by consultees will be considered as the new SWLP is developed.

Objective 7: To support the reduction of greenhouse gas emissions through sustainable management of waste

- 3.7.17 It is recognised that Surrey is constrained in options for sustainable transport for waste as movements by rail and water are difficult. However, the council strongly considers that there should be an aspiration to manage waste as sustainably as possible and this should include how waste is transported.
- 3.7.18 Consultees supported the option to minimise the need for transport by locating new facilities in proximity to population centres, but stressed that residential amenity, accessibility and sustainability matters will need to be taken into account by the council as options are developed and appraised.

3.8 Criteria for Suitable Land Assessment

Sites and areas suitable for waste related development

- 3.8.1 Consultees stated a preference to see specific sites identified for waste infrastructure, rather than broad areas in order to provide certainty to not only borough and district councils but also to residents and businesses who may be impacted by these facilities.
- 3.8.2 Furthermore, one WPA suggested that the process for assessing suitable land (not the criteria) was unclear and cautioned using a binary method for including sites. They recommended using a ‘Red Amber Green’ (RAG) approach instead, given the difficulties in finding suitable sites in the South East.

Land designated as Green Belt

- 3.8.3 District and borough councils suggested that under ‘potential land use conflict’ the criteria could be expanded in order to differentiate between land within the urban area, previously developed land, greenfield sites and land covered by Green Belt designation.
- 3.8.4 Furthermore, that the description of “inappropriate development” should reflect the policy in the NPPF i.e. it is not only new buildings which are inappropriate in the Green Belt and in fact any development may affect openness.

Areas designated for landscape value

- 3.8.5 Comments from the Surrey Hills and High Weald AONB Boards suggested the need for a stronger emphasis on designated landscapes. In particular, they were keen to see that sites of least environmental value are selected. It was suggested the council could do this by ensuring land allocations avoid designated landscapes and consider the direct and indirect effects of development on land within the setting of designated landscapes.
- 3.8.6 The Surrey Hills and High Weald AONB Boards helpfully suggested amended wording for the Assessment of Suitable Land Scoping Statement which was:
 “Sites for strategic waste facilities (i.e. serving more than their immediate community) should not be taken any further in the Assessment unless it has been demonstrated there are no suitable alternative sites outside the AONB.”

Areas designated for biodiversity value

- 3.8.7 The Environment Agency also provided suggested wording to the Assessment of Suitable Land Scoping Statement to include:
 “Sites that are known, or may have established populations of BAP priority species and S41 species to also be evaluated on a case by case basis”
 “Sites that are partly or wholly within SNCIs should not be considered”
- 3.8.8 Natural England requested that all relevant Sites of Special Scientific Interest (SSSIs), European sites (Special Areas of Conservation and Special Protect Areas) and Ramsar sites should be included on the proposals map for the area so they can be clearly identified in the context of proposed development allocations and policies for development.

Water environment

- 3.8.9 The Environment Agency agreed that Flood Zones 2 and 3 should be identified as "preliminary criteria" and that landfill sites and waste management facilities for hazardous waste will not be considered in Flood Zones 2 and 3. They also advised that waste treatment is "not compatible" with Flood Zone 3b (see tables 2 and 3 of the nPPG) and that when selecting sites, opportunities should be sought to reduce the risk and impact of flooding.

- 3.8.10 For criteria related to "surface water catchments", the Environment Agency advises that all sites within catchments of surface watercourses (i.e. those that have pathways to a watercourse) should be evaluated on a case by case basis, not just those that are exhibiting 'poor' ecological status. This is consistent with the Water Framework Directive that seeks to prevent deterioration in ecological status of all waterbodies.

Aerodrome safeguarding

- 3.8.11 Gatwick Airport responded with suggested changes to the Assessment of Suitable Land Scoping Statement as follows:

"Section 6.2.3 'Selection Criteria' request that 'Aerodrome safeguarding considerations' are added to that list.

Appendix 2 'Draft Site Selection Criteria' Under part i 'Vermin & Birds' other factors that need to be taken into consideration for example the heights of buildings & structures, lighting, renewable energy, gas flaring etc. Therefore we would ask that part i) 'Vermin & Birds' be replaced with the following: i) Aerodrome Safeguarding Criterion: Wildlife strike hazard risk, Heights of buildings & structures, Lighting, Renewable energy, Gas flaring.

Secondary Criteria: Sites within the Gatwick Aerodrome 15km Safeguarding Zone will be evaluated on a case by case basis."

Transport

- 3.8.12 One consultee highlighted that greater emphasis should be placed on the road network in relation to waste management. They suggested that under secondary criteria the final line should be amended to "Roads will need to be suitable for HGVs and sites should not be reliant on unclassified local roads".

- 3.8.13 Comments on this matter were also received from the County Highway Authority that suggested the following changes to the section on Highways Capacity:

- Criteria: Sites that would generate a 30% HGV movement increase on the adjoining network will be evaluated on a case by case basis.

The sites will be evaluated to determine the suitability of the access arrangements and the safe and suitable use of the public highway within the immediate area.

- Related Policies: Specific guidance exists within existing Local Plans regarding HGV movements and can be agreed via securing routing during the planning stage (i.e. via conditions)

3.9 Duty to Cooperate Scoping Statement

- 3.9.1 All consultees supported the principle of meaningful, early and on-going engagement with DtC bodies in the creation of the new SWLP. All but one consultee accepting that the DtC Scoping Statement would help the council in discharging its duty.

- 3.9.2 The one consultee who did not accept this felt that, although the framework was a useful starting point, it would need to be implemented and evidenced throughout the preparation of the local plan in order for the council to discharge its duty.
- 3.9.3 In addition, one consultee commented that the current statement lists the authorities that receive significant waste exports from Surrey but not those authorities that export waste to Surrey.

4 Operators and Landowners

4.1 Overview

- 4.1.1 Ten responses were received from site operators and/or landowners on the issues and options consultation. A further 18 operators provided information on the capacity of their current site to support the evidence base for the new SWLP although a number of operators provided information for multiple sites. Outstanding capacity information will be pursued by the council.

4.1 Context

Housing figures

- 4.1.1 Operators picked up on the number of local authorities in Surrey who are currently preparing Local Plans which cover different plan periods. It was suggested that the new SWLP should be sufficiently flexible and provide sufficient allocated sites (including the possibility of reserved sites) to meet the highest levels of growth suggested in these plans.
- 4.1.2 The council will be working with district and borough councils to make sure that the amount of waste arisings being planned for in the new SWLP is proportionate to the growth that these councils are expecting.

Waste Arisings

- 4.1.3 Operators highlighted the need to plan for waste arising from existing and planned development, including housing and employment sites, using appropriate forecasts to evaluate the need over the length of the plan period. Many noted that they were unable to comment on the predicted waste arisings at this time but would be interested in what waste arisings the Council is planning for.
- 4.1.4 One operator pointed out that certain waste streams in particular are problematic in Surrey, including; green waste, wood waste and residual waste suitable for energy recovery as the County has a lack of these types of facilities.

Deliverability

- 4.1.5 Nearly all operators who responded to the consultation commented on the highly competitive nature of the property market in the south east. In Surrey and adjoining London boroughs this has led to allocated sites being lost to alternative, higher value land uses such as for housing as many types of waste management facilities cannot compete with other more profitable land uses.
- 4.1.6 Some operators considered that the co-location of facilities could help make schemes more financially attractive and therefore sites less likely to be lost to alternative uses.
- 4.1.7 In addition, operators noted that it is often difficult to raise the necessary funding to promote and secure planning permission for waste facilities, particularly given the complex nature of the planning system. Operators also encouraged the allocation of specific sites to provide certainty to site promoters.

Plan period

- 4.1.8 Due to the speed of transition in the industry, operators were adamant regarding the need for flexibility.
- 4.1.9 In terms of the plan period some considered that a maximum plan period of 10 years would be more appropriate. Others recognised that the 15 year time frame was in line with the NPPF and was suitable for a strategic plan, but again made it clear that the new SWLP should have sufficient flexibility to respond to changes in the industry.
- 4.1.10 Operators also highlighted that most of the recent changes in the resource management sector have largely been driven by European Union (EU) legislation. There is now a large amount of uncertainty about the future direction of UK policy following the June referendum. Again, emphasising the need for flexibility to be able to respond to policy changes.

4.2 Issues**Environmental Protection**

- 4.2.1 Operators acknowledged Surrey's high quality environment, which is in part a key driver for the significant demand for new housing and employment land, however strongly supported the idea that opportunities exist within the County's environment for waste management facilities. In addition, some pointed out that well-operated facilities which manage waste sustainably do themselves provide an environmental benefit which was not adequately recognised in the documentation.

Transport

- 4.2.2 One operator supported the WPA in encouraging the transportation of waste to waste management facilities by means other than the road network. Others noted that while in other areas of the country they are able to use other means of transporting waste (e.g. rail), this was very difficult in Surrey, however it was acknowledged that there were a range of options which could help to encourage more sustainable transport by road.

4.3 Draft Vision

- 4.3.1 Operators noted the ambition to eliminate waste to landfill by 2033 but commented that this was unlikely to be achievable. While they supported the emphasis on reduction, reuse and recycling, they noted that landfill remains the only treatment method for difficult to manage and uncommon waste streams and it is still significant in treating the residues from waste recycling and treatment facilities.
- 4.3.2 Operators agreed that it is likely that there will always be some need for some strategic landfill facilities for residual material that cannot be managed elsewhere. Therefore the council should be taking steps to safeguard landfill resources. Nearly all operators suggested that Surrey County Council should work with other waste planning authorities to ensure that the need for landfill is recognised and landfill facilities are provided, locally or regionally.

4.4 Draft Objectives

Competition for land

- 4.4.1 As noted above, operators were concerned with the competition for land in Surrey and adjoining London boroughs. More than one operator suggested that the council should make appropriate provision to take some waste from south and west London.

Safeguarding

- 4.4.2 With respect to safeguarding, there was a mix of views whereby some operators supported only those sites which were consistent with the vision and objectives of the plan being safeguarded, while others believed that all existing waste management facilities should be safeguarded, including landfill.

4.1 Options

Objective 1: To increase the sustainable management of waste through waste prevention, re-use, recycling and recovery

- 4.1.1 One operator noted that Surrey currently does not have any energy from waste (EfW) capacity (the facility at Charlton Lane has permission but is not yet operational) and a large proportion of waste is currently sent outside the County for treatment. Therefore, it was suggested, adequate provision should be made within the new SWLP to provide sufficient capacity in waste treatment sites to accommodate waste currently sent out of the county for treatment in line with the proximity principle.
- 4.1.2 More generally, operators considered that this objective was important and that additional provision of waste treatment facilities were needed to meet this objective, including waste recovery plants that will handle non-recyclable waste.

Objective 2: To encourage communities and businesses to take responsibility for their own waste

- 4.1.3 Operators supported the WPA working with key stakeholders to ensure that waste prevention, re-use, recycling and recovery targets are met. They supported the council undertaking early and meaningful engagement with local communities and working collaboratively with other planning authorities through the Duty to Cooperate.
- 4.1.4 However, operators did not agree that waste management facilities should be located near to communities due to issues with locating sensitive uses near to operational sites. In particular this may result in the loss of the benefits of allocating larger facilities, such as economy of scale. There were also issues associated with facilitating other forms of development as part of a wider mixed-use development.

Objective 3: To ensure new waste management facilities are developed in suitable locations

- 4.1.5 Operators noted that, as indicated in the National Planning Policy for Waste (NPPW), waste management facilities are often controversial in nature and again emphasised the difficulties with locating waste management facilities near to key population centres given the likely constraints (including highways and environmental) and public amenity.
- 4.1.6 Under this objective, Thames Water highlighted the continued need for a specific wastewater/sewage sludge treatment policy as this type of waste management has different geographical and technical requirements from other forms of waste management. The need to include a specific policy for wastewater in the new SWLP is recognised by the council.

Objective 4: To make the best use of land when managing waste

- 4.1.7 As outlined earlier, operators noted the issues around competition for available land with more profitable land uses, alongside this, the amount of land in Surrey that is identified as Green Belt. Operators suggested there could be a need to look at land designated as Green Belt that was not previously developed land when identifying suitable sites. However, they noted this would need to be justified through the identification of the need for new facilities.
- 4.1.8 Some operators saw merit in co-locating waste facilities within areas of non-waste developments, including industrial estates as these proposals may offer additional benefits such as using by-products from waste recovery, facilitating other forms of development or providing local jobs and economic growth.
- 4.1.9 However, others noted that modern industrial estates are unlikely to be fit for waste use due to a number of factors including:
- The competition for sites: Industrial sites are limited in the South East and therefore may have low vacancy rates, high rents or be more selective of tenants
 - Sites have a common owner: Often these sites can be owned by investment companies who obtain income from rent and who prefer to rent to higher value industries
 - Sites are primarily designed for moving goods: The built structure is based on storage uses which are transporting goods and is not suitable for waste or waste vehicles. This can include issues like inadequate height of eaves or raised platforms present in loading bays.
 - The need for storage areas: Due to the need to generate the most rent, sites are predominantly covered by buildings whereas typically waste uses require large external storage areas
- 4.1.10 The exceptions to this are sites which are bespoke or built specifically for waste uses. However, other disused buildings outside of industrial estates such as abandoned farms and old aerodromes can make good sites provided they have good access.

- 4.1.11 The council will need to consider these comments as it seeks to identify suitable areas of land for waste development.

Objective 5: To maximise the economic benefits of waste management

- 4.1.12 Some operators have provided information to support the economic benefits which waste businesses provide to the local economy including details of the employment generated by their sites. Some provided information about the likely investment and other economic gains associated with the development. Generally, the council recognises the positive contribution the waste management sector provides to the economy within the local area.

Objective 6: To encourage innovation and new technologies which provide opportunities to minimise the impact of waste development on communities and businesses

- 4.1.13 Operators' main concern with Objective 6 was that it failed to demonstrate how it would encourage innovative and new technologies. They requested that more detail be provided in future stages of plan preparation.

Objective 7: To support the reduction of greenhouse gas emissions through sustainable management of waste

- 4.1.14 Generally, operators agreed that the SWLP should seek to limit vehicle movements from the highways network, thereby reducing greenhouse gas emissions and improving environmental conditions for the benefit of local residents. They provided a number of suggestions as to how this could be achieved including:
- Greater use of railway networks for transporting waste
 - Using vehicles which ran on alternative fuels
 - Locating depots and facilities together to minimise vehicle movements
 - Transporting waste outside of 'normal' operating hours
- 4.1.15 All these options will need to be considered when preparing the new SWLP.

5 Businesses

5.1 Difficulties Contacting Businesses

- 5.1.1 It has historically been very difficult for the council to engage businesses for a variety of reasons. As a result, the council's understanding of commercial waste streams and the needs of businesses are limited.
- 5.1.2 In order to identify the needs of businesses a bespoke survey was created and distributed through the Surrey Business Forum. However, only one business responded to the survey.
- 5.1.3 Further work is therefore needed to identify the needs of businesses in Surrey with respect to changes in the type and amount of waste being produced and to ensure commercial and industrial wastes are fully considered.

6 Residents

6.1 Statement of Community Involvement

- 6.1.1 The Statement of Community Involvement (SCI) sets out how and when stakeholders can influence the content of new planning policy documents. The SCI sets out guiding principles for public engagement, including:
- Trying to involve everyone who may be affected by planning decisions
 - Using a range of methods to make it easy for people to respond
 - Having an open and transparent process
 - Managing expectations and providing feedback to respondents
- 6.1.2 The council identified a range of organisations and people who may be affected by planning decisions in Surrey in the SCI. These groups will be contacted by email or letter, to all statutory organisations and other organisations or groups on our minerals and waste database.
- 6.1.3 The council will publish the updated database alongside the outcome of the consultation. The details of the consultation were widely distributed by a range of print and digital media to make sure that any organisations who did not receive a letter would be aware of the consultation. Any new organisations identified through the Issues and Options Consultation will be added to the database.
- 6.1.4 The SCI states that for the gathering of evidence and public consultation on what the local plan should include should last for 12 weeks. The Issues and Options Consultation was held for the period 2 September to 25 November. This is greater than the statutory consultation period required for most documents and was aimed at giving respondents sufficient time to receive and consider the documents.
- 6.1.5 The SCI requires that consultation documents are published on the council's website with details of where and when paper copies of consultation documents can be viewed. The documents were published on a webpage for the new SWLP and made documents available at district and borough council offices. A Plain English survey was made available which was aimed at making the key information in the consultation accessible to all residents. Copies of these surveys, with self-sealing envelopes for easy return, were provided at district and borough council offices and local libraries.
- 6.1.6 Finally, the SCI requires the council to publish a summary of the results of consultations on our website. The council acknowledges that it may not be able to reply to individual representations but it will make sure that it outlines the key issues and how the council intends to address these at later stages in the development of the new SWLP.

6.2 Overview

- 6.2.1 Over 600 representations were received in response to the public consultation. Only three parish councils and/or residents' associations responded and one action group.
- 6.2.2 The responses received were a mix of on-line responses, paper questionnaires, letters and emails. The majority of responses (84%) were submitted via the online consultation portal with only 16% of responses submitted in paper form. There was a relatively even split between respondents in the age categories 35-44, 45-54 and 55-64. Fewer responses were received from the age groups 35 and under. For a geographical distribution by borough/district see Appendix 3.
- 6.2.3 The majority of respondents were happy with the process the council was intending to follow to develop the plan. Those that were unhappy about the plan preparation process were mainly concerned about changes to the service being offered at Community Recycling Centres (CRCs) and the process lacking clarity and transparency.

6.3 Identified Issues

- 6.3.1 Surrey County Council, as the WPA, identified a range of issues considered by the council to be important in terms of the context for planning for waste facilities. Broadly this included:
- Rules and practices for managing waste e.g. encouraging reuse and recycling
 - Achieving economic benefits from waste
 - Making sure there are waste facilities for future growth e.g. new houses being built
 - Minimising impacts to the transport network e.g. busy roads
 - Minimising impacts on the local area's environment e.g. air quality
- 6.3.2 A large number of respondents (65%) strongly agreed that 'Rules and practices for managing waste' and 'Minimising impacts on the local area's environment e.g. air quality' (73%) were important issues. Other factors, such as 'achieving the economic benefits of waste' received less support (36% strongly agreed).
- 6.3.3 Over half the respondents felt that 'Making sure we have waste facilities for future growth e.g. new houses being built' (63% strongly agreed) and 'Minimising impacts to the transport network e.g. busy roads' (53% strongly agreed) suggesting that these issues were also important to residents.

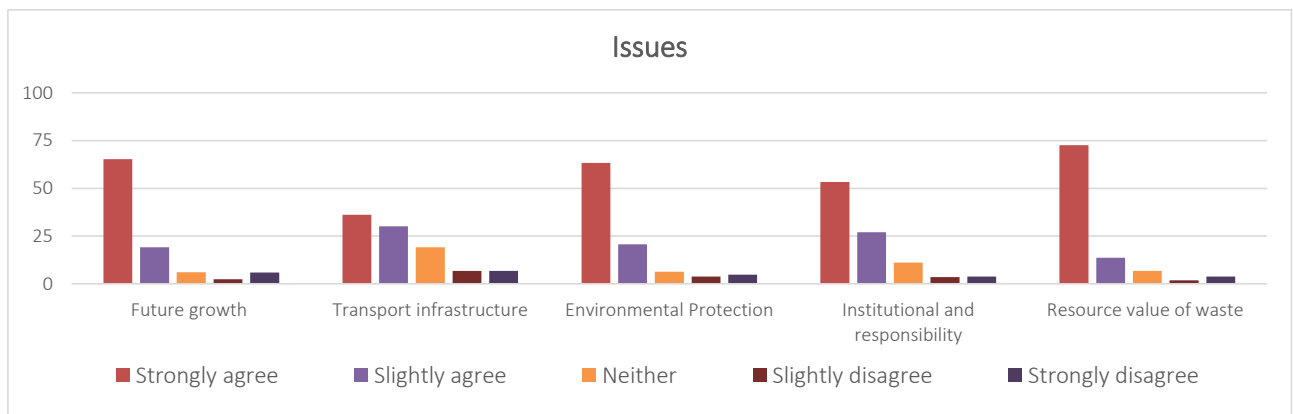


Figure 2 Result of residents views of the issues (%)

- 6.3.4 Respondents were asked if there were any other issues that the council should be considering. Responses from residents included; the needs of local communities, particularly around accessibility and the level of service they receive, promoting sustainable waste management techniques and moving away from landfill to cleaner, greener technologies were also supported.

6.4 Other Issues for consideration

Issues related to waste disposal

- 6.4.1 The largest number of comments received from residents related to the introduction of charges at Community Recycling Centres and the perception that this has or will result in an increase in fly tipping. The issues of charges at CRCs falls outside the remit of the WPA and comments related to the management of the CRCs have been passed to the Waste Disposal Authority (WDA) to review. However the council is encouraged by the number of residents who use the CRCs and it will work (as the WDA) to address this issue.
- 6.4.2 There were 73 comments which related to encouraging recycling. These comments referred to reducing packaging from businesses and educating the public on what can be recycled and reused.

Transport

- 6.4.3 A number of comments received related to HGVs being located on smaller residential, country roads. As Surrey County Council is also the Highways Authority it is essential for the county council to review the strategy for managing HGV traffic on the road. Paragraph 5 of the NPPW states that sites should be suitable for "the capacity of existing and potential transport infrastructure to support the sustainable movement of waste".
- 6.4.4 The WPA will consider, when assessing new waste sites, any adverse impacts on the local road network and impact on residents. As the Highways Authority, Surrey County Council provides comments and may recommend conditions on planning applications where there are highways issues relating to road safety, intensification and sustainability. The council will work with its partners including operators and other authorities to manage HGV movements as effectively as possible.

Environmental Concerns

- 6.4.5 More than 40 comments supported minimising impacts on the environment. These made reference to both local environmental issues as well as wider national environmental issues. These comments also related to adverse impacts that existing waste sites had on the environment. This would typically refer to sites being located away from areas which had high pollution levels in order to avoid further pollution.
- 6.4.6 The new SWLP will be compliant with national policy which states that site suitability should consider "the cumulative impact of existing and proposed waste disposal facilities on the well-being of the community, including any significant adverse impacts on environmental quality" (paragraph 5 of the NPPW).

Location and Accessibility

- 6.4.7 A number of comments were received regarding the location of waste sites. In particular, a number of comments received related to making recycling facilities accessible to a wider range of residents e.g. students and the elderly. It was evident that many residents recognised the need for recycling centres to be located within a reasonable distance of housing.
- 6.4.8 These comments will be considered when assessing the potential of land suitable for waste development. They may be incorporated into the 'Assessment of Suitable Land Scoping Statement' where appropriate.

New Technologies

- 6.4.9 Several comments referred to new technologies for dealing with waste. Many comments stated disagreement with using landfill and that waste could be better used as an energy resource by using incineration.
- 6.4.10 In accordance with the NPPW paragraph 3 it is recognised that waste management facilities such as incinerators can be controversial. This is also recognised by the WPA and will be considered during site assessments and as part of making informed decisions on where such developments would be appropriate if at all. The WPA will need to remain engaged with the public in ensuring that their views are recognised and that they recognise the National Policy requirements for planning for waste.

6.5 Draft Vision

6.5.1 Generally, there was support for the draft vision as showing a positive approach (37% strongly agree and 33% slightly agree) and ambition and being ambitious (40% strongly agreeing and 29% slightly agreeing). Not all residents agreed that the vision was achievable (only 17% strongly agreed).

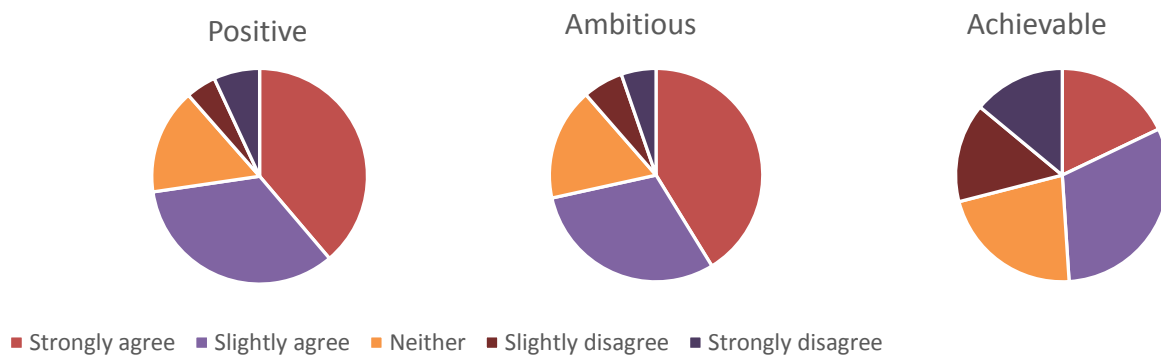


Figure 3 Result of residents views of the vision (%)

- 6.5.2 Respondents were asked to comment on the draft vision. A total of 232 comments were made which directly related to the vision. From these comments, 64 respondents commented on the vision being unclear or confusing and contained jargon. The council will consider the wording of the vision so it is clear and accessible to a range of stakeholders.
- 6.5.3 Comments were also received in response to wording in the vision which promoted 'managing waste in facilities within the County'. There was a mixed response as a number of respondents did not want more facilities in Surrey.
- 6.5.4 Paragraph 3 of the NPPW states that "Waste planning authorities should prepare Local Plans which identify sufficient opportunities to meet the identified needs of their area for the management of waste streams". However, the NPPW also requires the WPA to consider "the extent to which the capacity of existing operational facilities would satisfy any identified need" (paragraph 3 of the NPPW) and the "physical and environmental constraints on development" (paragraph 5 of the NPPW). Therefore new waste management facilities will need to be carefully considered and the need for these facilities weighed against other constraints.
- 6.5.5 Finally, the council recognises that to a certain extent the market will determine where waste is managed and this could mean that Surrey's waste may be treated outside of the County. The council's position is to provide facilities in Surrey to meet the *equivalent* waste arising in the county which is consistent with national policy.
- 6.5.6 There were further comments related to the proposed plan period for a new waste local plan. The NPPF states that plans should "be drawn up over an appropriate time scale, preferably a 15 year time horizon, take account of longer term requirements, and be kept up to date".
- 6.5.7 Respondents commented on wording in the vision which stated 'By 2033 there will be no landfill of waste'. Some respondents doubted that zero landfill waste was achievable by 2033, while others stated that 2033 was not ambitious enough and that this date should be brought forward.

6.6 Other Comments

- 6.6.1 These comments highlighted a strong recommendation for the council to continue to engage with residents and stakeholders. The Statement of Community Involvement sets out the consultation process and the timescales associated with each stage for residents and other stakeholders to provide input into the new waste local plan. Specifically, the next stage of consultation will be on the draft plan and will also run for 12 weeks.
- 6.6.2 This consultation did not contain any sites or areas being considered for waste related development. A number of residents were keen to see further details in the plan. Residents will have opportunity to view and comment on these sites and areas as part of the draft plan stage.

Appendix 1 – Types of Consultees

Table 1 Types of consultees

Stakeholder type	Examples of who this included
Duty to Cooperate Bodies	<ul style="list-style-type: none"> • Surrey District and Borough Councils • Adjoining Local Authorities • Other Waste Planning Authorities • Mayor of London • Transport bodies • Historic England • Natural England • The Environment Agency • Local Enterprise Partnerships • Surrey Local Nature Partnership
Other organisations	<ul style="list-style-type: none"> • Other Government Organisations • Surrey Wildlife Trust • National Trust • The Canal & River Trust • AONB Management Boards
Operators and Landowners	<ul style="list-style-type: none"> • Operators at existing sites • Any landowners who are interested in waste sites
Businesses	<ul style="list-style-type: none"> • Surrey Businesses
Residents	<ul style="list-style-type: none"> • Residents Associations • Parish Councils • Neighbourhood Planning groups • Voluntary organisations • Action Groups • Residents

Appendix 2 – Duty to Cooperate Bodies and other Agencies

Table 2 Duty to Cooperate Bodies who responded to the Issues and Options Consultation

Organisation/Authority
Elmbridge Borough Council
Mole Valley District Council
Reigate & Banstead Borough Council
Runnymede Borough Council
Spelthorne Borough Council
Waverley Borough Council
Islington
Bedford
East Sussex
Hampshire
Kent
Peterborough
Sandwell
Stockton-on-Tees
North London Waste Plan
The Environment Agency
Historic England
Natural England
Transport for London
Network Rail
County Highway Authority
Gatwick Airport

Table 3 Other agencies who responded to the Issues and Options Consultation

Surrey Hills AONB Office
High Weald AONB Office

